



Study supporting the evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning

Final Report

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Abstract

The aim of this study is to support the Commission in evaluating the actions taken in the Member States in response to the 2012 Council Recommendation on the validation of non-formal and informal learning (VNFIL).

It focuses on whether the objectives of the Recommendation have been achieved in terms of enabling individuals:

- to identify and document their skills and competences acquired through non-formal or informal learning;
- and to obtain either full or part qualifications compliant with recognised national and European standards for the benefit of their professional and social development.

The study finds that Member States have made good progress in developing VNFIL arrangements since 2012 even if service provision often remains asymmetrical or fragmented across different levels of education and training as well as different occupational sectors. The contribution of the Recommendation to the progress made is best visible in those Member States where VNFIL arrangements were mostly inexistent prior to 2012, but less apparent in the remaining Member States. Nevertheless, the Recommendation is deemed to have given some strategic direction to policy discussions on VNFIL across the Member States. This study concludes with possibilities to consider for enhancing the influence of EU interventions on Member States' VNFIL policies and processes.

Executive Summary

Purpose of the study

This study aims to support the Commission in evaluating the actions taken in the Member States¹ in response to the 2012 Council Recommendation (hereafter CR) on the validation of non-formal and informal learning (VNFIL).

It examines the extent to which the objectives of the CR have been achieved in the Member States, namely, to enable individuals:

- to identify and document the knowledge, skills and competences acquired through non-formal or informal learning;
- and to obtain, when applicable, full or part qualifications compliant with recognised standards and in line with European reference frameworks for the benefit of their personal, professional and social development.

It is based on five evaluation criteria:

- **Effectiveness:** the extent to which the objectives of the CR have been achieved through the actions taken by the Member States to adopt the four-stage approach to VNFIL and the ten principles for developing VNFIL arrangements, as well as through the provision of follow-up and support activities at EU level;
- **Efficiency:** the extent to which the actions taken by the Member States in response to the CR are cost-effective;
- **Relevance:** of the CR to the present socio-economic context seven years on from its adoption;
- **Coherence:** of the CR notably with other relevant EU initiatives and with national policies;

¹ Mentions of Member States in this study, which covers a period until 2018, always include the United Kingdom.

- EU added value: of the CR to Member States' validation-related actions as well as to agenda-setting in the Member States.

Methodology

The evaluation study involved both desk research and field research.

Desk research involved the review and analysis of secondary sources at EU, international and national level.

The main EU and international-level sources included:

- The 2018 European Inventory on validation (Synthesis Report, associated Country Reports and Thematic Reports; as well as previous editions: 2010, 2014 and 2016) as key source of information for progress against the baseline situation prior to the introduction of the CR;
- Recent EU-level research studies: Skills Audit (DG EMPL); linkages between validation and career guidance (Cedefop);
- Cedefop's 2015 European Guidelines on VNFIL;
- Academic papers published by the ILO, OECD and UNESCO.

The following national-level sources were prioritised for review:

- Key policy documents issued since 2012;
- Policy implementation guides issued since 2012;
- Recent (annual) activity reports relating to VNFIL from relevant ministries or agencies;
- Recent studies on the topic of VNFIL (new policies, evolution of the systems).

Field research encompassed three activities: key informant interviews, expert group meetings, and an open public consultation.

A total of 72 key informant interviews were completed across the EU Member States. The stakeholders interviewed include:

- National representatives of the European Qualifications Framework (EQF) Advisory Group specialised in validation, who may be from ministries or government executive agencies;
- Ministries and other policymaking bodies in charge of VNFIL (stakeholders not represented on the EQF Advisory Group);
- National organisations specialised in validation-relevant issues such as career guidance and labour market activation (e.g. PES, but also youth organisations);
- National authorities for qualifications and certifications – usually responsible for national qualification frameworks (NQFs);
- National education and training institutions providing VNFIL;
- EU or international organisations active in VNFIL (e.g. EU youth organisations).

Two expert group meetings were held in Brussels on 13-14 November 2019 to obtain further insights from relevant stakeholders on the CR in relation to the following themes:

- "The role of employers and other labour market actors in VNFIL arrangements";
- "How VNFIL relates to NQFs and the shift to learning outcomes and flexible learning pathways".

The open public consultation was conducted online between 7 August and 13 November 2019 and received 262 responses in total. The online questionnaire was structured around the study's five evaluation criteria.

Main findings

Effectiveness

Member States² have overall made relatively good progress towards meeting the objectives of the CR since 2012.

The availability of and accessibility to validation initiatives has improved since 2012. By 2018, all EU Member States offered validation procedures in at least one of the following areas: education and training, labour market, third sector. In addition, available data generally suggests an upwards trend in participation across the EU since 2012. There is some evidence that the CR has contributed to improvements in terms of availability of and accessibility to validation in around half of the Member States.

The four-stage approach to validation as presented in the CR has been broadly adopted in most Member States, often with terminological and procedural adaptations in their respective validation arrangements.

Improvements in the integration of their validation and formal education systems are reported for most Member States. Almost all Member States are reported to have linked validation to their respective NQFs, which themselves are referenced to the EQF. Considerable progress has been made since 2012 regarding synergies between EU credit systems (ECVET, ECTS) and validation, with such synergies reported to be currently in place in 24 Member States compared to only 11 in 2012.

Validation initiatives that aim to support disadvantaged groups and skills audit opportunities have increased notably across the Member States since 2012. Nevertheless, a major challenge continues to be the high barriers to entry that persist for such groups. These include the costs, complexity and length of validation processes, service fragmentation and the perceived low value of validation in certain countries.

Validation allows for the award of full or partial qualifications in an increasing number of Member States, with the recognition and acceptance of validation outcomes in other countries being in theory supported by EU transparency policy and tools. However, no clear picture emerges as to the use of transparency tools to document validation outcomes. Europass and Youthpass are only used in some instances. It is expected the new Europass may facilitate the documentation of VNFIL outcomes.

There has been some progress in the inclusion of transparent quality assurance measures in validation initiatives – primarily driven by the increase in the number of national-level quality assurance frameworks that are specific to validation. The provision of training opportunities for staff involved in validation to develop appropriate competences is consistent in only around half of the Member States. However, the CR has only been reported to have an influence on quality assurance and staff professionalisation in a handful of Member States.

While some Member States have encouraged multi-stakeholder cooperation for the development of validation arrangements based as per the CR, there are still many Member States where this is not the norm.

Stakeholders consider that follow-up and support activities in the area of validation are more limited than for other EU initiatives and processes in related areas, such as the EQF or the Bologna process. There is less intense monitoring than in those cases

² As mentioned above, in this study, which covers a period until 2018, Member States always include the United Kingdom.

and support activities have not always given Member States enough impetus to act to implement the principles of the CR systematically and comprehensively.

Despite the progress achieved since 2012, the coverage of validation remains partial and asymmetrical in the EU. Provision is still far from being comprehensive in most EU Member States which tend to prioritise validation in relation to certain areas, subjects, sectors or occupations, and not others, thus limiting opportunities for the widest possible access to validation.

The causal links between the positive trends previously mentioned and the CR are generally difficult to establish. Without developments in the creation of NQFs and the shift to learning outcomes in European lifelong learning systems, most notably, it would have been difficult to observe similar progress.

Overall, the evidence of the effects of validation on the improvement of labour market prospects is scarce. There is again very little evidence to suggest that the CR has enabled individuals to use validation to work or learn across the EU.

The CR appears to have had the greatest effects in countries that were at an early stage of development regarding validation in 2012. In this respect, the CR has had an effect in terms of the reduction of disparities in the level of development of validation arrangements across the EU. More generally, the CR has also served to structure the provision of validation while giving it greater visibility at the national level.

Efficiency

In most Member States, there is insufficient monitoring data on validation to conduct a full cost-benefit analysis of the CR. It was generally reported that the benefits of validation should theoretically exceed its implementation costs, but no data was provided to support this view in most cases.

There is in fact a diversity of funding models across the Member States which reflect the diversity of their respective validation arrangements.

The study nevertheless found enough evidence that no dedicated funding mechanisms or budget lines for validation can hinder its provision due to competing priorities in education and training policy.

ESF co-financing has had capacity building effects in Member States where validation systems were still in their early stages of development in 2012, improving the cost-effectiveness of their implementation in the longer term.

Public funding overall an important resource for the development and provision of validation services. However, the lack of engagement from private sector stakeholders in the financing of validation initiatives leads to situations where costs are disproportionately borne by public institutions in certain Member States. This lack of engagement can be related to a lack of multi-stakeholder collaboration on validation.

Conversely, there is some evidence to suggest that the application of the CR's principles on multi-stakeholder collaboration – whereby all parties can agree to a common vision on validation – is a factor of efficiency and helps to spread costs between different types of stakeholders, which can contribute to the sustainability of initiatives.

Tailoring validation processes to specific target groups can be another factor of efficiency, because it generates savings in the application of validation.

Paradoxically, economic recessions and unemployment can also be a factor of efficiency inasmuch as they can drive demand for upskilling or reskilling as well as private investments in validation.

Relevance

The CR objectives are perceived to be relevant to the current social and economic context. They respond to challenges such as the modernisation and digitalisation of work likely to result in significant re-structuring of occupations and work-to-work transitions.

It has encouraged the development of validation initiatives to enhance the competitiveness of the workforce, particularly among those with lower levels of formal educational achievement.

The CR's principle regarding the establishment of links between validation and NQF/EQF is highly relevant given the importance of non-formal and informal learning for the acquisition of new skills over one's lifetime that can be converted into qualifications to meet new demands in the labour market.

The CR aims to encourage multi-stakeholder collaboration, but this may not be enough to overcome differences of opinion among different stakeholder types as to what purpose validation should serve and this can inhibit their fruitful collaboration. As such, the relevance of the CR varies according to different stakeholder types; employers only find validation relevant if it is a guarantee of one's employability while other stakeholders may attach more importance to the social inclusion aspects of validation.

It has also been pointed out that the CR does not place enough emphasis on the importance of innovative approaches to reach disadvantaged groups, particularly considering that many individuals in these groups may have had negative experiences of assessments.

With regards to governance and support structures, the EQF advisory group and the organisation of peer learning activities have been relevant and have contributed to the achievement of the objectives of the CR. However, as noted, support structures for the CR have been less intense than for some other EU initiatives in related areas.

Coherence

The CR is thematically and conceptually coherent with EU policies in education and training, employment and career guidance; it is also explicitly linked to several EU-level instruments (e.g. EQF, credit systems, transparency tools, and quality assurance frameworks).

The CR is also coherent with the shift to learning outcomes that the EU has been promoting over the last decade, and its work on the EQF and NQFs, as already noted. Significant progress in the development of NQFs since 2012 in various Member States has also been coherent with the CR. There is evidence that the Council Recommendation of 2016 on Upskilling Pathways has inspired national-level validation initiatives for the low-qualified and low-skilled that are coherent with the principles of the CR.

Coherence between the CR and national validation policies was reported in most Member States. In some cases, the CR and national-level policies have mutually reinforced each other in the implementation process. In a clear example of coherence, national policies in some countries have been explicitly created or updated based on the CR. This has taken place with regards to national validation policies, but also – in some cases – with regards to other strategies and legislation related to broader lifelong learning policies.

However, the multiplicity of EU initiatives can lead to a lack of coherence in practical implementation at the national level.

The coherence between the CR and EU transparency tools could be further clarified. Despite recognising potential synergies between them, stakeholders in the Member

States often reported to require further guidance on how those could be materialised in practice.

The different EU credit systems (e.g. ECVET, ECTS) and quality assurance frameworks (e.g. EQAVET) in education and training appears to have led to a situation in many Member States where there is uncertainty as to how best combine their application to improve the development, accessibility and transparency of validation arrangements across the EU.

EU added value

The CR appears to have generated the greatest volume effects in Member States where validation arrangements were mostly inexistent prior to 2012; in those countries it is unlikely that national policies alone would have developed validation systems to the same extent without EU intervention.

In certain Member States with more advanced validation systems, the CR has given validation some visibility and strategic direction in the context of policy discussions. EU funding support has also strengthened implementation efforts at the national level by providing additional capacity for the development of validation systems and processes in keeping with the principles of the CR.

The CR has had some scope effects in that it has contributed to the development of a more widely shared understanding of and approach to validation at EU level. There is evidence from several countries that the validation approach set out in the CR is contributing to the modernisation of policies related to validation, particularly in the area of career guidance.

However, the CR has rarely led to profound legislative changes at the national level. As a result, Member States' validation systems have kept their specificities and remain fairly differentiated. This can be explained by national differences in perception as to the purpose and usefulness of validation in addressing priorities of a social or economic order, something that was already acknowledged in the design of the CR. The CR was indeed designed to be sensitive to the existence of national circumstances and specificities, which justifies the existence of differences in validation arrangements from one country to another.

Lessons learned

Future initiatives should consider the importance of developing validation arrangements in a comprehensive way to ensure their availability across all levels of education and training, all occupational sectors in the labour market as well as the third or voluntary sector.

There may be scope for a future EU-level intervention bringing together the principles of the CR and those of related EU initiatives (e.g. Upskilling Pathways), to facilitate synergies between the areas of validation, labour market activation and lifelong learning.

Recommendations could be more specific regarding the appropriateness of different tools and processes for the identification, documentation, assessment and certification of non-formal and informal learning. In the same vein, the appropriateness of tailoring validation services to specific target groups depending on their distance from the labour market or education should be considered.

The establishment of more stringent Open Methods of Coordination and a strengthened role of the EQF advisory group in monitoring the progress of the implementation may be needed to effectively drive the development of comprehensive and consistent validation arrangements in all the Member States.

Finally, there is a lack of centralised and standardised data on validation in most Member States. The EU could address this issue by coordinating data collection in the Member States (e.g. participation numbers, outcomes achieved, costs, participants' characteristics etc.) to guarantee that future policies on validation are based on robust evidence.

1 INTRODUCTION

1.1 Purpose of the Evaluation

This study aims to support the Commission in assessing and evaluating the actions taken in the Member States³ in response to the 2012 Council Recommendation on the validation of non-formal and informal learning (VNFIL)⁴. As required by the Recommendation, this study will inform the report of the Commission to the Council on the experience gained in VNFIL and implications for the future.

The report examines the extent and the manner in which the Council Recommendation's objectives have been met in the Member States, namely: to enable individuals to identify and document the knowledge, skills and competences acquired through non-formal or informal learning and to obtain, when applicable, full or part qualifications compliant with recognised standards and in line with European reference frameworks for the benefit of their personal, professional and social development.

The evaluation builds on and complements the findings of the 2018 European Inventory of validation.

1.2 Brief presentation of the Council Recommendation

The Council Recommendation calls on Member States to establish, by 2018, validation arrangements allowing individuals to identify, document, assess and certify (including through recognised qualifications) their competences acquired through non-formal and informal learning. This VNFIL process is intended to take a pivotal role in increasing employability and mobility (across sectors, occupations and geographies), as well as motivation for lifelong learning, especially concerning socio-economically disadvantaged individuals and those with low qualification levels. Thereby, it is expected to contribute to economic competitiveness, economic growth and social cohesion.

The Council Recommendation presents VNFIL as a four-stage process comprising the (1) identification, (2) documentation, (3) assessment of an individual's learning outcomes acquired through non-formal and informal learning, and the (4) certification of the results of the assessment of an individual's learning outcomes acquired through non-formal and informal learning in the form of a qualification (or credits leading to a qualification).

It sets out several principles while taking into consideration national, regional, local, as well as sectoral needs and characteristics:

- Information and guidance on the benefits and procedures of VNFIL are available to all
- Guidance and counselling are readily available during the VNFIL process
- VNFIL arrangements are linked to national qualification frameworks and conform to the European Qualification Framework (EQF)
- The qualifications obtained through VNFIL – whether full or partial – comply with standards equivalent to formal education programmes
- The use of EU transparency tools (e.g. Europass, Youthpass) is promoted in order to facilitate the documentation of learning outcomes;

³ Mentions of Member States in this study, which covers a period until 2018, always include the United Kingdom.

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32012H1222%2801%29>

- Synergies exist between VNFIL and credit systems (ECTS⁵ and ECVET⁶)
- Disadvantaged groups are likely to benefit greatly from VNFIL, increasing their participation in lifelong learning and their labour market access
- Unemployed and individuals at-risk of unemployment have the opportunity undergo a 'skills audit'
- Transparent and appropriate quality assurance measures are in place to support reliable and credible VNFIL processes
- Provision is made for the development of the professional competences of staff involved in the VNFIL process.

Besides these principles, the Council Recommendation further calls for a set of follow-up and reporting measures to ensure transparency, accountability and sustainability.

- Member States and the Commission should follow up the Recommendation through the EQF advisory group set up;
- Member States and the Commission should report on progress made in Joint Reports under the ET 2020 strategic framework and in future Joint European Union Youth Reports;
- Member States should report on progress made in the annual report on the respective development of National Qualification Frameworks (NQFs).
- Finally, the Council Recommendation calls upon the Commission to support Member States and stakeholders by:
 - Facilitating effective peer learning and exchanges of experience and good practice,
 - Regularly reviewing the European Guidelines for the Validation of Non-formal and Informal Learning, in full consultation with the Member States,
 - Regularly reviewing the European Inventory on the validation of non-formal and informal learning, in cooperation with the Member States

In this context the Commission is making use of expertise of EU Agencies, in particular Cedefop.

1.3 Overview of the evaluation criteria and key questions

The theoretical elements, principles, activities and/or measures set out in the Council Recommendation (hereafter: CR) presented in Section 1.2 are to guide the actions of the Member States and of the Commission.

They therefore relate directly to the performance and the effectiveness of the Recommendation. This constitutes an evaluation criterion which examines the extent to which the general and specific objectives of the CR have been achieved, both in terms of VNFIL activities implemented and follow-up support provided.

In addition to the **effectiveness** of the CR in meeting its objectives, the evaluation covers:

- **efficiency** considerations (costs of CR implementation vs. benefits generated – by whom, for whom, and contributing factors);
- **relevance** of the CR to the present socio-economic context (six years on from its adoption);

⁵ European Credit Transfer and accumulation System

⁶ European Credit system for Vocational Education and Training

- **coherence** of the CR with other relevant measures (at EU and national level); and of CR measures with one another;
- **added value** of the CR (volume effect or added contribution to Member State action; sustainability effect or continual need for CR; process effect or contribution agenda-setting; scope effect or contribution to harmonisation of VNFIL across the Member States).

The criteria and their respective questions provide the structure for the interim findings presented in Section 3.

1.4 Structure of the final report

The remainder of the report is structured as follows:

Section	Description
2. Research methods	Brief presentation of the desk and field research activities, the methods used to carry them out, and of the analytical approach to triangulating and synthesising the information collected.
3. Intervention logic	Some further changes to the Intervention logic have been made to link validation (and the CR) to wider EU policy objectives.
4. Research findings	The findings are presented based on the questions in the Terms of Reference across all five evaluation criteria, which have been linked to elements of the Intervention Logic. For the Effectiveness criterion, findings on overall progress against the baseline situation (pre-CR) are presented (TOR Q1.1) separately from contribution of CR to progress (TOR Q1.2)
5. Conclusions and lessons learned	Summary of the findings from the previous section with a presentation of preliminary conclusions and lessons learned to be further developed and discussed in the context of the Expert Group meetings.
6. Next steps	Overview of the activities leading up to the final report with the updated timetable
Annexes	<ul style="list-style-type: none"> -Synopsis report of consultation activities -Report on the Expert group meetings -Analysis of the results of the OPC

2 RESEARCH METHODS

The method – and tools - used for carrying out the research tasks for this study were developed in keeping with the study’s conceptual approach.

The table below provides an overview of the research tasks undertaken for the study.

Research task	Description
1. Desk research	Reviewing existing literature and official documentation
2. Field research	<ul style="list-style-type: none"> Key informant interviews (KII) Expert group meetings

Research task	Description
	Open public consultation (OPC)
3. Conclusions and Lessons learned	Synthesis and triangulation of data from Tasks 1 and 2

2.1 Desk research

By involving the review of already available documentation on the topic of VNFIL, this task has sought to firstly establish the 'state of play' on the implementation of the VNFIL Recommendation across the EU Member States and to prepare for the field research, particularly the key stakeholder interviews (KIIs).

The desk research involves the review of studies and reports at the **EU and national levels**.

The **2018 European Inventory on validation** (Synthesis Report, associated Country Reports and Thematic Reports; as well as previous editions of the Inventory: 2010, 2014 and 2016) has constituted a key source of secondary information for this study.

Recent **EU-level** research studies such as the one on Skills Audit (DG EMPL), on linkages between VNFIL and career guidance (Cedefop), the one-off reports by Member States on validation⁷ to the EQF Advisory group, and the study on the instruments supporting the European Union vocational education and training (VET) policy have provided complementary information. Other sources reviewed include European Commission publications, Cedefop resources, ECVET Secretariat resources, specialised reports from the European Youth Forum and the Lifelong Learning Platform, as well as academic papers published by the ILO, OECD and UNESCO⁸.

At the **national level**, the following literature sources were prioritised for review:

- Key policy documents issued since 2012.
- Policy implementation guides issued since 2012
- Recent (annual) activity reports relating to VNFIL from relevant ministries or agencies
- Recent studies on the topic of VNFIL (new policies, evolution of the systems)

Despite certain constraints around availability, the project team has aimed national-level sources of the above description – at least one key policy document or implementation guide issued since 2012 and at least one recent activity report or recent VNFIL study per country⁹. The various national-level sources are referenced throughout the interim findings presented in Section 3 of this report.

It should be noted that academic literature on the topic of VNFIL remains relatively limited and in most cases does not fit into the scope of this evaluation study.

The collected secondary information served to tailor the fieldwork research tools (i.e. interview topic guides) focusing on specific evaluation questions left (partially) unanswered upon completion of the desk research.

The review of national and EU/International-level secondary sources is one of the building blocks of the approach to the triangulation of research findings.

⁷ All the one-off reports released so far: AT, DE, DK, FR, LU, LT, LV, PL, PT, SE.

⁸ A full list of references is available from the Revised Inception Report of 24 May 2019

⁹ Inventory country reports will be available to identify further relevant national-level sources, if needed.

Numerous national-level publications are also available from <https://vince.eucen.eu/repository-countries/>

In addition, this desk research task also involves the verification of national-level information emanating from different secondary sources (e.g. an EU-level publication and Member State policy documents).

2.2 Field research

The field research activities have sought to complement and verify secondary information as well as to generate additional insights on the issues raised in the evaluation framework.

The identification of the most relevant stakeholders and stakeholder networks for conducting fieldwork activities was detailed in the stakeholder engagement plan presented in the Revised Inception Report.

2.2.1 Key informant interviews (KIIs)

The following **groups of stakeholders** were prioritised to take part in the KIIs:

- National EQF Validation representatives, who may be from ministries or government executive agencies
- Ministries and other policymaking bodies in charge of VNFIL (stakeholders not represented on the EQF advisory board)
- National organisations specialised in validation-relevant issues such as career guidance and labour market activation (e.g. PES, but also youth organisations)
- National authorities for qualifications and certifications (usually responsible for NQFs)
- National education and training institutions providing VNFIL
- EU or international organisations active in VNFIL (e.g. EU youth organisations)

The study team has aimed to conduct at least 60 KIIs in total: between two and four KIIs per Member State as well as between five and ten KIIs with EU or international organisations.

Table 1 below shows that 72 KIIs were conducted in total. In some cases, the stakeholders interviewed provided responses incorporating the information and perspectives obtained from colleagues and partners from other closely connected institutions or public bodies.

Table 1. *Number of KIIs completed by Member State and at EU level*

Member State	No. of KIIs completed	Member State	No. of KIIs completed
Austria	2	Italy	4
Belgium	3	Latvia	0
Bulgaria	2	Lithuania	1
Croatia	3	Luxembourg	2
Cyprus	3	Malta	2
Czech Republic	3	Netherlands	4
Denmark	0	Poland	3
Estonia	1	Portugal	3

Member State	No. of KIIs completed	Member State	No. of KIIs completed
Finland	3	Romania	1
France	3	Slovakia	2
Germany	2	Slovenia	2
Greece	4	Spain	2
Hungary	2	Sweden	4
Ireland	5	United Kingdom	1
Number of EU-level KIIs completed			5
Total number of KIIs completed			72

In some Member States, no KIIs could be conducted (DK, LV) while in several others fewer than two were completed (EE, LT, RO, UK). This was mostly due to lack of responsiveness or lack of detailed knowledge of the CR among some of the targeted stakeholders. Some of the stakeholders interviewed could not answer all the questions relating to the evaluation as their familiarity with VNFIL in the national context did not always translate into knowledge of the CR; this explains why information from certain Member States on specific evaluation questions may be missing.

The following table shows the type of stakeholders taking part in the KIIs for this evaluation study. Representatives of education ministries in the Member States most frequently took part in the KIIs, followed by national VET agencies and qualification authorities. Across these three stakeholder groups, half of the EQF AG members were interviewed. Very few labour market stakeholders could be interviewed; in many cases, both at the national and EU-level they either declined to be interviewed or remained unresponsive to our invitations for an interview. Many labour market stakeholders were also only identified as secondary or back-up key informants.

Table 2. *Overview of KIIs completed by stakeholder type*

Stakeholder type	No. of KIIs completed		
Ministry of education representatives	21	No. of KIIs with EQF AG members	14
National VET agency representatives	12		
Qualification authority representatives	11		
VNFIL organisation representatives	8		
HEI and academia representatives	8		
Chambers of commerce and crafts representatives	4		
Labour market agency representatives	2		
Ministry of labour representatives	1		
EU umbrella organisation representatives	5		
Total	72		

2.2.2 *Expert group meetings*

The Expert group meetings were an opportunity for study team members and the participating stakeholders to reflect on the interim findings and to share their own

experiences and observations in relation to the implementation of the CR (in different Member States and the EU) and on the topic of validation more generally.

The points raised during the discussions have fed into the findings in this report; the information generated from the expert discussions also enabled the verification against information obtained from other sources (mainly desk research and KIIs).

Two thematic meetings were held in Brussels over two days:

The role of employers and other labour market actors in validation arrangements
Wednesday 13 November 2019

How validation arrangements relate to national qualification frameworks (NQFs) and the shift to learning outcomes and flexible learning pathways
Thursday 14 November 2019

The agendas for the two Expert group meetings and the report summarising the main points of discussion are annexed to this Draft Final Report. The Expert group meetings report was circulated as a standalone document to the participating stakeholders.

2.2.3 Open Public Consultation (OPC)

The Open Public Consultation (OPC) has served to gather views on the Council Recommendation from the wider community of experts and practitioners on VNFIL on the one hand, and from people who have undergone a VNFIL process or who would benefit from VNFIL on the other (i.e. end beneficiaries¹⁰).

As an online survey, the OPC mostly contained closed-ended questions but the possibility was given to respondents to explain in textual form their answer choices and to attach relevant documentation to their OPC contribution. Certain questions were only targeted at organisations with knowledge of VNFIL while some others were specifically targeted at individual end-users of VNFIL.

Following its translation into 22 other European languages, the OPC was launched on 7 August 2019 and closed on 13 November 2019. It was disseminated to the relevant networks of DG EMPL with the targeted networks having been requested to disseminate the OPC to their respective beneficiaries and partners.

National ministry stakeholders taking part in the KIIs have also been asked to disseminate the OPC to their relevant networks, while national-level VNFIL and career guidance organisations have been encouraged to do likewise with their beneficiaries.

The OPC generated a total of 262 responses. In addition, ten responding organisations submitted a position paper together with their survey response.

The analysis of the OPC responses is included in Annex 2 of this interim report and its results embedded in this report²

Triangulation and synthesis of findings

A triangulation and synthesis of findings has been carried out for this report through the **cross-comparison** of information and data collected from various sources, namely:

- Secondary sources (e.g. national implementation report v. EU-level report on the 'state of play')
- Desk research v. field research; mainly involving the verification of findings from the 2018 Inventory

¹⁰ Particularly among socio-economically disadvantaged groups: e.g. such as individuals who are unemployed or at risk of unemployment or who are low-qualified

- First-hand experiences with specific aspects of the Recommendation gathered from KIIs, the Expert group meetings and the OPC

This process has fed into the formulation of findings for each main evaluation question building on the following approach:

1. Overview of trends and developments at EU level, across all Member States
2. Identification of trends by country clusters, where relevant and appropriate
3. Comparison of country-specific experiences and outcomes (with identification of good practices), where relevant and appropriate.

The **conclusions** cover each evaluation criterion and are based on a **synthesis of the interim findings**:

Criterion	Synthesis of findings
Effectiveness	VNFIL Recommendation's performance against its stated objectives
Efficiency	VNFIL Recommendation's effectiveness (see above) compared to its implementing costs (i.e. resources mobilised)
Relevance	Extent of policymaking, policy coordination and political activity relating to the VNFIL Recommendation and its objectives
Coherence	Of the VNFIL Recommendation with other related EU policy initiatives and instruments
EU added value	Extent of the usefulness of the Recommendation to improve the availability and quality of VNFIL (in accordance with stated objectives)

Based on the conclusions presented in this report, a set of '**lessons learned**' for potential follow up have been put forward for the consideration of the Commission.

3 INTERVENTION LOGIC

This section presents the Intervention Logic for the 2012 VNFIL Council Recommendation (CR), outlining the needs it aims to address – also within the wider EU strategic context – as well as its objectives, activities, outputs, results and impacts.

3.1 Needs and policy context

Strategically, the CR stemmed from the **need** to ensure that European citizens can have all their learning experiences (formal, non-formal, informal) recognised and valued as a way to address a set of economic and social challenges created by a fast-changing world of work characterised by technological development and occupational flexibility.

The Impact Assessment¹¹ for the Council Recommendation states that VNFIL can generate benefits at the level of individuals (enhanced employability, career prospects, better wages, better access to formal education etc.) and of the economy (better skilled population and better skills match on the labour market, etc.) thus contributing to more inclusive societies.

According to the Impact Assessment, the introduction of the Council Recommendation can be explained by the fact that validation opportunities were limited and underused in most Member States, and that national approaches to validation were not sufficiently comparable and coherent to allow for the transnational mobility of worker and learners¹².

Placing the CR in the wider policy context, VNFIL is conceived of as contributing to the implementation of EU policies in the fields of education and training, employment, social inclusion and youth in the framework of the Europe 2020 Strategy for smart, sustainable and inclusive growth¹³. More specifically, VNFIL has a function in terms of improving citizens' insertion into and progression within the labour market while contributing to the better matching of labour supply and demand, which also implies that all citizens can find an occupation suited to their competences and interests. Therefore, VNFIL not only has relevance to Europe's growth and competitiveness objectives, it also serves the purpose of achieving a Social Europe.

Besides Europe 2020, other EU strategic initiatives adopted after the CR have placed further emphasis on VNFIL, especially as a tool for social inclusion: The New Skills Agenda for Europe and Upskilling Pathways (2016) as well as the European Pillar of Social Rights (2017)¹⁴.

3.2 Objectives, results and impacts

In line with the Impact Assessment, two **overall objectives** and two **specific objectives** are identified, themselves linked to two main **results** and **impacts**:

- On the one hand, availability, accessibility and comprehensiveness of VNFIL – expected to lead to:
 - increased number of countries with expected validation systems (Result)
 - increased number of individuals making use of validation (Impact)

¹¹ SWD (2012) 252 final.

¹² Conclusions of the 2010 European Inventory on Validation (serving as the baseline)

¹³ The Europe 2020 Strategy in mentioned in Recital 4 of the CR

¹⁴ Principle 1 (Education, training and lifelong learning) and Principle 4 (Active support to employment)

- On the other, the development of VNFIL systems across the EU for citizens' mobility (between and within education and work)¹⁵ – expected to lead to:
 - increased number of countries with recognised, coherent and comparable national approaches to validation (Result)
 - increased number of individuals using validation for upward (and geographical) mobility in education/training and/or work (Impact)

3.3 Activities and outputs

The **activities** and **outputs** presented are based on the principles and mechanisms for validation outlined in the Recommendation, which are expected to guide Member States' actions in response to it.

These activities and outputs have been grouped under six categories (with some principles can be relevant to more than one of these categories), presented below¹⁶: The first three categories are mainly linked to the objective of improving the availability and accessibility of VNFIL and the last three are mainly linked to the objective of developing comparable VNFIL systems across EU Member States.

1. Comprehensive validation services and provision of information and raising awareness

(Art.1, 3.b) information and guidance on the benefits of, and opportunities for validation, as well as on the relevant procedures, are available to individuals and organisations;

(Art.1, 3.e) the validation of non-formal and informal learning is supported by appropriate guidance and counselling and is readily accessible;

2. Outreach to disadvantaged groups

(Art.1, 3.c) disadvantaged groups, including individuals who are unemployed and those at risk of unemployment, are particularly likely to benefit from the validation arrangements, since validation can increase their participation in lifelong learning and their access to the labour market;

(Art.1, 3.d) individuals who are unemployed or at risk of unemployment have the opportunity, in accordance with national legislation and specificities, to undergo a 'skills audit' aimed at identifying their knowledge, skills and competences within a reasonable period of time, ideally within six months of an identified need;

3. Methodologies, quality assurance and professionalization

(Art.1, 3.f) transparent quality assurance measures in line with existing quality assurance frameworks are in place that support reliable, valid and credible assessment methodologies and tools;

(Art.1, 3.g) provision is made for the development of the professional competences of staff involved in the validation process across all relevant sectors;

4. Linking validation to formal qualifications and credit systems

(Art.1, 3.a) the validation arrangements are linked to national qualifications frameworks and are in line with the European Qualifications Framework;

(Art.1, 3.h) qualifications or, where applicable, parts of qualifications obtained by means of the validation of non-formal and informal learning experiences comply with

¹⁵ Another aspect to consider is the comparability or convergence of national VNFIL systems to facilitate citizens' EU mobility for work or for learning.

¹⁶ Referred to as articles of the Council Recommendation

agreed standards that are either the same as, or equivalent to, the standards for qualifications obtained through formal education programmes;

(Art.1, 3.j) synergies exist between validation arrangements and credit systems applicable in the formal education and training system, such as ECTS and ECVET

5. Linking validation and European Tools

(Art.1, 3.i) the use of Union transparency tools, such as the Europass framework and Youthpass, is promoted in order to facilitate the documentation of learning outcomes

6. Support and follow-up for joint monitoring, peer exchanges and evaluations

Articles 2 and 3 of the Recommendation mentions the need for activities in the area of coordination. This includes actions ensuring the involvement of relevant stakeholders, with a particular emphasis on coordination between countries. Those actions can take the form, amongst others, of the production of relevant monitoring and evaluation reports, peer-learning activities and exchanges of good practice, further development of relevant guidelines and of instruments under the Europass framework.

3.4 Understanding causal chains

Causal chains between objectives, actions, outputs, results and impacts are generally complex. The Intervention Logic diagram presented in this section aims to simplify the understanding of causal chains by presenting the CR's two main objectives as two strands of activities and outputs to which an intended result and impact is linked.

To facilitate the reading of the Intervention Logic, the causal chains are represented by colours, instead of arrows¹⁷. For the same readability reasons, only main causal chains are represented, although it is acknowledged that other chains are at play given the complex interrelationships between the different aspects of the intervention.

3.5 Other elements

As the Better Regulation Tool 46 specifies, constructing the Intervention Logic should include a consideration of the **different stakeholders involved** and their expected actions to deliver the promised changes over time, and thus achieve the objectives of the intervention. In the case of the current assignment main stakeholders include:

- Learners
- Education and training providers,
- Employers,
- Social Partners (Employer representatives and Trade Unions),
- Chambers of commerce and skilled crafts,
- Bodies in charge of national qualification frameworks and standards
- National bodies for the recognition of learning outcomes,
- Employment services,
- Civil society organisations and Youth organisations
- VNFIL providers (specifically, within the above groups),

¹⁷ It should be added that some of the activities and outputs listed in the Intervention Logic may relate to both overall/specific objectives as these are interrelated

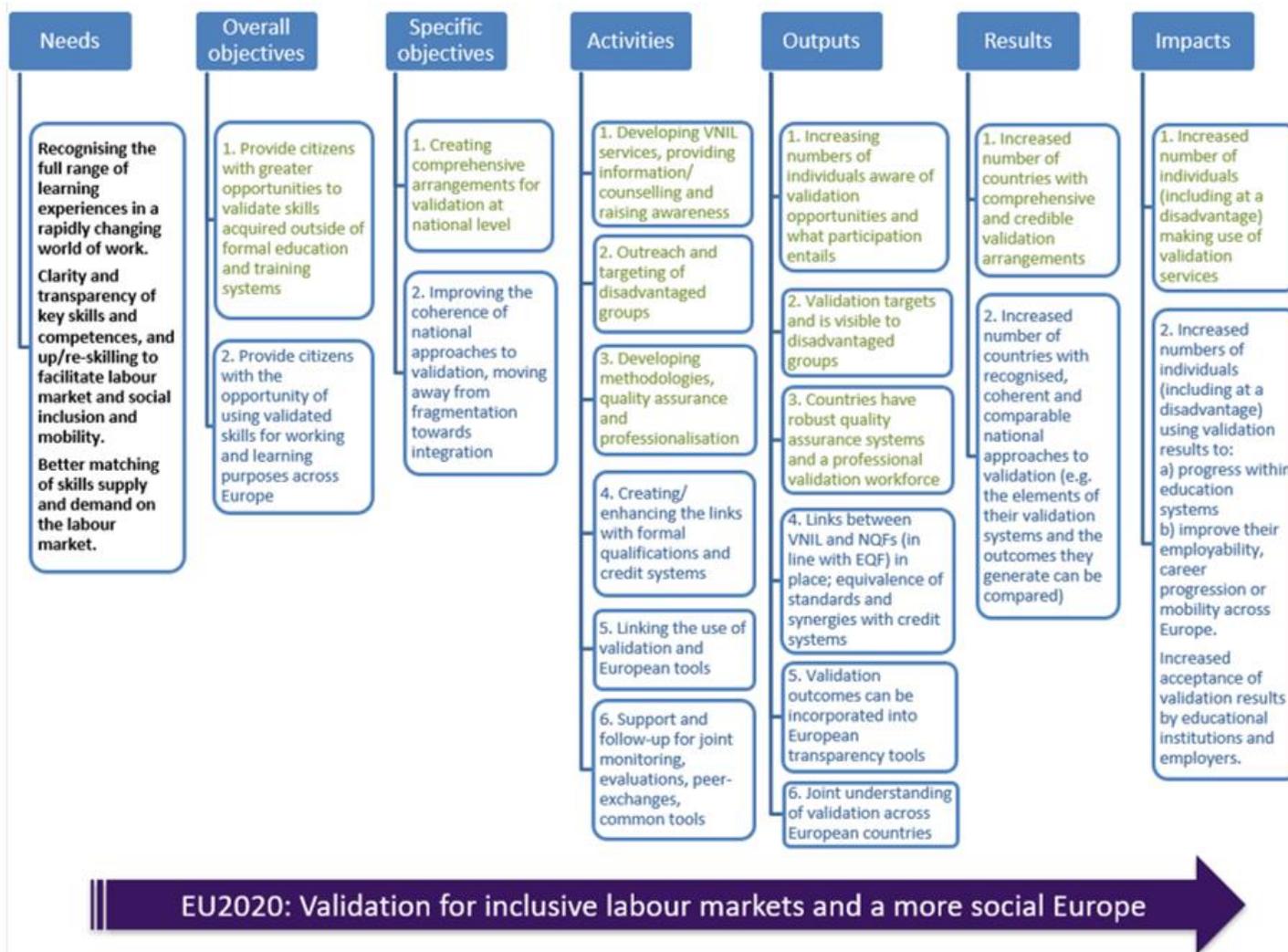
The stakeholders are not represented in the Intervention Logic diagram, neither as separate entities nor as groups. This can be explained by the fact that the CR encourages the development of validation actions involving multi-stakeholder partnerships.

External factors beyond the control of the intervention are not included in the Intervention Logic figure, but they deserve some commentary as they can influence the intervention's effects, as noted in the Council Recommendation's Impact Assessment. In summary, these are:

- The macroeconomic situation and labour market policies of Member States, which can affect for example the political priority attached to validation or the resources devoted to related measures.
- Other technical and economic developments, which can also affect the need for or availability of validation. For example, rapid economic and technological change – such as that brought about by digitalisation – may increase the need for measures around validation.
- High levels of unemployment, which may provide impetus to further develop validation systems, particularly in contexts in which these are combined with high numbers of low qualified/ low skilled individuals, or in which there is evidence of skills supply and demand mismatches or under-utilisation of skills.
- Demographic factors, such as an ageing population and significant immigration flows into Europe – e.g. migration crisis of 2015-2016 – which may provide incentives to further develop validation systems, so as to make the KSCs of these groups – acquired through work and life experiences – transparent and facilitate their utilization.
- Other relevant social and cultural factors that are relevant: low levels of labour mobility may be an indication of the need for stronger validation systems; cultural and attitudinal barriers against validation may exist.

Resources are not included in the Intervention Logic figure, to simplify the graphic representation. They include validation infrastructure and human resources (for guidance, assessment, training, etc.), expertise (CEDEFOP, European Commission, Member States, practitioners, etc.) and public funding (for example for programmes, peer-learning activities or research projects, as noted in the Recommendation).

Figure 1. Invention logic



4 RESEARCH FINDINGS

The research findings presented in this report were produced from an analysis, comparison and triangulation of secondary information sources (desk research) and primary information sources (field research: KIIs, OPC, Expert group meetings).

Table 3 details how the research findings are presented in the report. The findings cover each of the five evaluation criteria (Effectiveness, Efficiency, Relevance, Coherence, EU added value) and are broken down by evaluation question as per the Terms of Reference. Where relevant, some of the evaluation questions are mapped against elements of the Intervention Logic (see Section 3).

Under the Effectiveness criterion in particular, the findings are organised in a way as to distinguish overall progress on the development of validation systems across the EU against the baseline situation (i.e. situation prior to the adoption of the CR¹⁸) from the extent to which the CR has influenced this progress.

While findings directly attributable to the introduction and/or implementation of the CR are mentioned as such, it is necessary to point out that many other findings cannot be considered as directly attributable to the CR due to a lack of supporting evidence.

¹⁸ Taken from the 2010 European Inventory Report.

Table 3. Presentation of the findings

Evaluation criterion	Section	TOR Evaluation (sub-)questions	Relationship to IL
Effectiveness	4.1.1	1.1.a) Individuals have easy access to opportunities to have their skills validated	Overall Objective 1; Specific Objective 1
		<i>Overall progress against baseline; Contribution of the CR</i>	
	4.1.1.1	Availability of VNFIL – coverage of the areas	Activities & Outputs 1, 2, 3; Result 1
	4.1.1.2	Availability of VNFIL – coverage of the stages	
	4.1.1.3	VNFIL participation and accessibility	
	4.1.1.4	Awareness of VNFIL opportunities, procedures and benefits – IAG	
	4.1.1.5	Awareness of what VNFIL entails – Guidance and counselling during VNFIL	
	4.1.1.6	VNFIL targeting disadvantaged groups	
	4.1.1.7	Quality assurance of VNFIL	
	4.1.1.8	Professionalisation of VNFIL practitioners	
	4.1.2	1.1.b) Individuals can use the results of validation to learn or work in Europe	Overall Objective 2; Specific Objective 2
		<i>Overall progress against baseline; Contribution of the CR</i>	
	4.1.2.1	Links between VNFIL and NQFs in line with EQF	Activities & Outputs 4, 5; Result 2
	4.1.2.2	Equivalence of standards between VNFIL and formal education qualifications	
	4.1.2.3	Synergies with credit systems	
	4.1.2.4	VNFIL outcomes can be incorporated in European transparency tools	
4.1.2.5	Multi-stakeholder approach ensuring a shared understanding of VNFIL within and across countries		
4.1.3	2. Extent to which follow-up and support actions have been taken	Activity & Output 6; Result 2	
	4.1.3.1		2.1) Follow-up actions

Evaluation criterion	Section	TOR Evaluation (sub-)questions	Relationship to IL
	4.1.3.2	2.2) Support actions	
		3. Impact of the CR	Overall Objective 2;
	4.1.4	3.1) Individuals find it easier to enter and move within the labour market	Impact 2
	4.1.5	3.2) Individuals can engage in learning opportunities throughout their career	
Efficiency	4.2.1	4.1) Costs and benefits generated – also covers 4.3) on 'Proportionality of costs' ¹⁹	NA
	4.2.2	4.2) Factors influencing efficiency	NA
Relevance	4.3.1	5.1) Relevance of objectives (Invitation 1)	NA
	4.3.2	5.2) Relevance of measures (Invitations 4 and 5)	
	4.3.3	5.2) Relevance of measures (Invitations 2 and 3)	
	4.3.4	5.3) Relevance of governance and support	
Coherence	4.4	6) To what extent is the CR coherent with other (EU) policies and related instruments	Specific Objective 2 Activities & Outputs 4 and 5 Result 2
	4.4.1	Internal coherence of the CR	
	4.4.2	Coherence with national policies on VNFIL	
	4.4.3	Coherence of CR with other relevant EU policy initiatives	
EU added value	4.5.1	Question 7 (volume effect 7.1 ²⁰)	Overall Objectives 1 & 2
	4.5.2	Question 7 (scope effect 7.2 ²¹)	Impacts 1 & 2
	4.5.3	Question 7 (sustainability and process effect 7.3 ²²)	

¹⁹ The material gathered does not allow for Sub-questions 4.1 and 4.3 to be addressed separately without risking repetition

²⁰ Not numbered in the Terms of Reference (page 23): “Could the objectives of the Recommendation have been achieved sufficiently by the Member States acting alone? In particular to what extent the main findings (results/outputs) identified could have been achieved without EU intervention?”

²¹ Not numbered in the Terms of Reference (page 23): “Were there benefits in replacing different national approaches with a more homogenous policy approach? To what extent are national validation arrangements converging?”

²² Not numbered in the Terms of Reference (page 23): “To what extent do the issues addressed by the Recommendation continue to require action at EU level?”

4.1 Effectiveness

The general CR objectives are described as providing citizens with:

- Greater opportunities to validate non-formal and informal skills, i.e. acquired outside formal education and training systems and
- The opportunity of using their validated skills across the EU for working and learning purposes

Both these general objectives have their respective operational objective described as:

- Creating comprehensive arrangements for validation at the national level
- Improving the consistency of Member States²³ validation arrangements

The Effectiveness section begins with reviewing the extent to which the activities and expected outputs described in the Intervention Logic have been generated.

It then summarises the findings from the research in relation to these two general and operational objectives respectively.

4.1.1 Availability and accessibility of validation: Individuals have easy access to opportunities to have their skills validated²⁴

This section relates to the first overall and specific objective of the CR as presented in the Intervention Logic. The key principles associated are points. b, c, d, e, f and g in Art.3.1. of the CR.

Each Effectiveness subsection relates to a question as listed in the TOR for this evaluation study, begins with information on overall progress since the adoption of the CR in 2012 (i.e. overall progress since 2012 / against the baseline) and concludes with information on the contribution of the CR to the progress made.

Overall progress against baseline: based on a comparison of data from the 2010 and 2018 European Inventory reports on VNFIL, with the 2018 Inventory data verified against and complemented with data collected as part of this evaluation study²⁵.

Contribution of the CR: information relating to the extent to which the progress observed since 2012 resulted from the CR, particularly in relation to the following aspects:

- Individuals in each Member State can access opportunities for VNFIL across all areas²⁶ and covering all four stages of the CR;
- Guidance services inform and advise people about the benefits of and opportunities for validation;
- Appropriate validation opportunities are an integral part of active policy measures to support disadvantaged groups;
- There are provisions to ensure that staff involved in validation develops the appropriate competences.

²³ As mentioned above, in this study, which covers a period until 2018, Member States always include the United Kingdom.

²⁴ Question 1.1.a. of the Terms of Reference

²⁵ Process of data triangulation

²⁶ Education and training (relate to formal systems: general, vocational and higher education); Labour market (primarily led by labour market stakeholders, with an aim of integration into or progression in employment; Third sector (relates to volunteering and not-for-profit, led by third sector organisations)

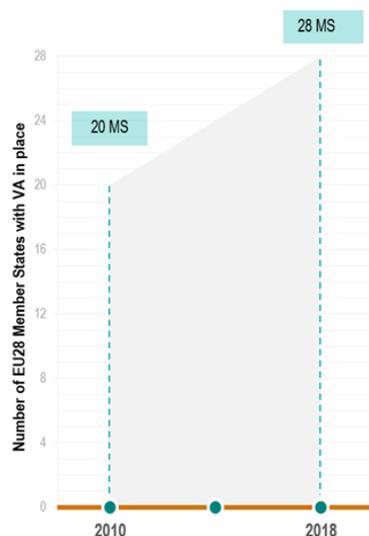
4.1.1.1 Availability of VNFIL – coverage of the areas

Overall progress against baseline

Baseline data is provided in relation to whether **validation arrangements** are in place in the 28 Member States (MS). The 2010 and 2018 Inventory data are not strictly comparable, though an overall comparison can be made.

As shown in Figure 2 and Figure 3, in 2010, validation arrangements were in place in 20 Member States²⁷²⁸.

Figure 2. Number of Member States with VNFIL arrangements in place 2010/2018



ICF: 2018/2010 European Inventory

Figure 3 provides an overview of Member States with validation arrangements in place in 2010 and by 2018.

Figure 3. Member States with VNFIL arrangements in place in 2010 and by 2018

AT	BE	BG	CY	CZ	DE	DK	Legend In place in 2010 (and 2018) In place by 2018
EE	EL	ES	FI	FR	HR*	HU	
IE	IT	LT	LU	LV	MT	NL	
PL	PT	RO	SE	SI	SK	UK	

*In the labour market and third sector only

Source: ICF: 2018/2010 European Inventory

Since 2016, the European Inventory collected information on validation arrangements across three broad areas: education and training²⁹, the labour market³⁰ and third

²⁷ AT, BE, CZ, DE, DK, EE, ES, FI, FR, IE, IT, LT, LU, NL, PT, RO, SE, SI, SK, UK

²⁸ 2010 data does not differentiate between the areas of education and training, labour market and third sector. Data was collected at national level only.

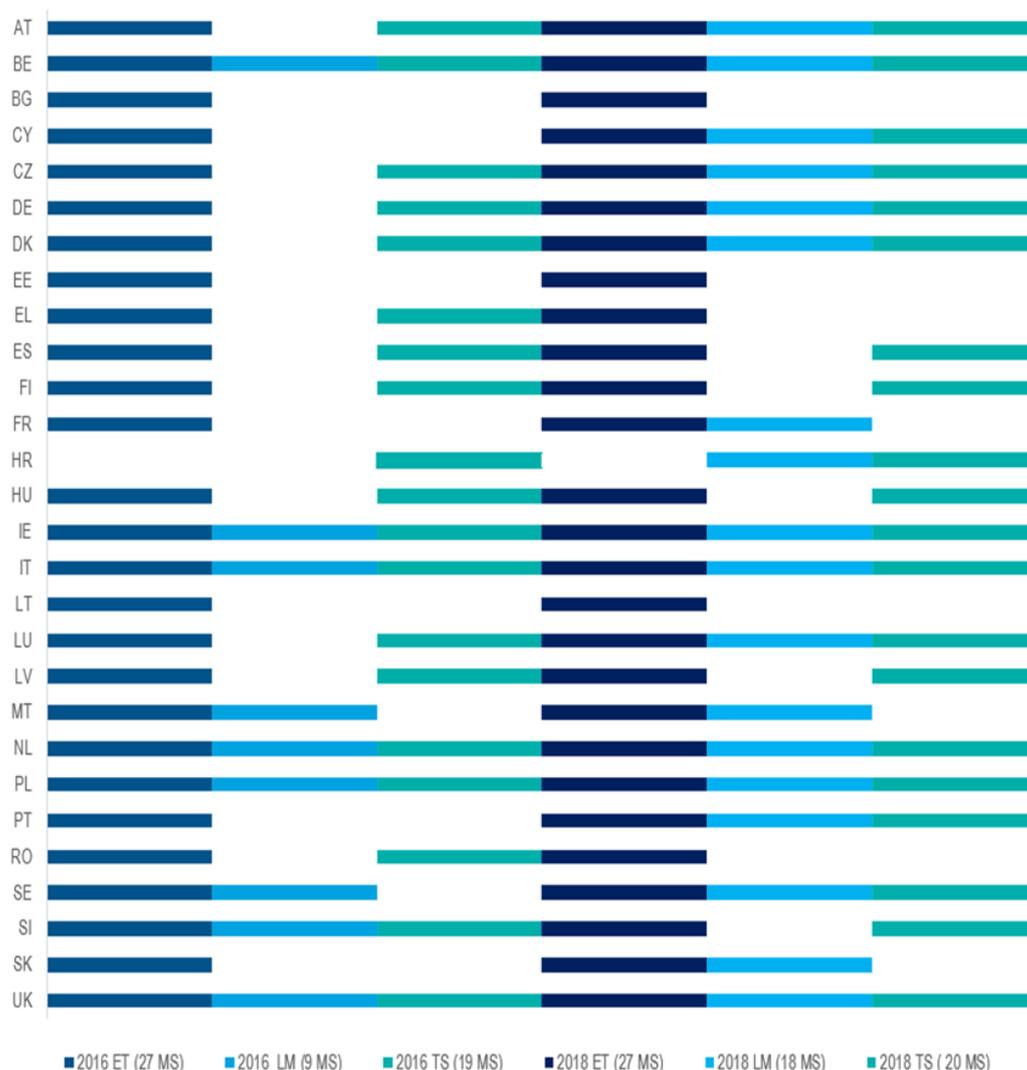
²⁹ Covering all or several of the following: General Education, (C/I) VET, HE, Adult Education. In 2010, data across the individual sub-sectors of the education and training sector was not collected – but at national level in general.

³⁰ Initiatives in which private sector institutions play a central role (alone or in collaboration with public sector institutions.). These initiatives might be promoted, for example, by employers or employers' associations.

sector areas³¹. Data from the 2018 Inventory shows that there are now possibilities for validation in at least one of these broad areas in all 28 Member States.

- Within the education and training (ET) area, validation arrangements are in place in 27 Member States (EU 28 except Croatia). As shown in Figure 4, this is consistent with the situation in 2016.
- Within the labour market (LM) area, validation arrangements were in place in 9 Member States in 2016. Based on 2018 Inventory data that has been triangulated with data collected for the current study, Figure 4 shows that by 2018 this number increased to 18 Member States.
- For the third sector (TS), validation arrangements were in place in 19 Member States in 2016, by 2018 this number increased to 20 Member States.

Figure 4. Overview of Member States with validation arrangements in place across the areas of education and training, labour market and third sector 2016/2018



Source: 2018/2016 European Inventory triangulated with data from the current study

In terms of the extent to which **validation strategies** are in place, over the years, the Inventory asked national experts to indicate if validation arrangements are

³¹ Initiatives associated with youth work or volunteering, or where opportunities for VNFIL are developed by third sector organisations such as charities or NGOs to support a variety of target groups (e.g. third country nationals, unemployed people, young people at risk of exclusion, people with a disability, etc.). They may or may not be connected to formal education activities.

embedded into a strategy, that is, whether there are overarching legal frameworks or policies specifically and explicitly establishing validation initiatives. As shown in Figure 5, in 2010, 12 Member States^{32,33} had some form of validation strategy in place or in development, by 2018 this number had increased to 27 (EU 28 except Croatia).

Figure 5. Member States with validation strategies in place or in development in 2010 and by 2018

AT	BE	BG	CY	CZ	DE	DK
EE	EL	ES	FI	FR	HR	HU
IE	IT	LT	LU	LV	MT	NL
PL	PT	RO	SE	SI	SK	UK

Legend:

In place in 2010	In place by 2018	Not in place yet
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Source: 2018/2010 European Inventory

It is noted that the creation of validation arrangements and/or strategy for validation does not always imply comprehensive validation systems. The CR recognises that Member States may prioritise certain areas and/or sectors within their validation arrangements in accordance with national needs and circumstances. In practice this means that Member States progress at different and varying speeds towards comprehensive validation arrangements across the broad areas of education and training, labour market and third sector. Conversely, where validation arrangements are only implemented (intentionally) in a specific area, sector or in relation to specific qualifications, this means that opportunities for VNFIL often remain very limited and greater efforts are needed to improve comprehensiveness across the areas of education and training, labour market, and the third sector. As discussed in more detail below validation strategies embedded in legal frameworks or policies for validation, though may support the implementation of validation across the three broad areas, does not also imply comprehensive validation systems are in place.

Contribution of the CR

If we consider the three broad areas where validation procedures may be applied – education and training, labour market, third sector – it appears that **validation arrangements are mainly in place in the education and training area**, whereas progress in the labour market and third sector areas has been less visible³⁴.

Findings show that while all Member States are either developing or already have general strategies or frameworks for validation, they **progress at different speeds towards having comprehensive validation processes**. The contribution of the CR in terms of extending validation arrangements to all areas (education and training; labour market; third sector) varies among the Member States.

The CR contribution is clearest in BE-nl, IT, and PT, with these three Member States having **nationally designed frameworks that integrate coverage of all areas**. Evidence from these countries points to CR as having had an influence on ensuring comprehensive coverage as much of the education and training as of the labour market areas.

- In Belgium’s Flemish region, a law regulates the integration of VNFIL systems across all sectors as well as the conditions for validation bodies to deliver certifications against a defined qualification or professional standard.

³² 2010 Inventory research question: ‘Does the country have a national (or where relevant, regional strategy or policy for validation?’

³³ CZ, DK, EE, ES, FI, FR, LU, MT, NL, PL, RO, SK

³⁴ 2018 European Inventory Synthesis report 2018, p.3

Organisations in all sectors (inside and outside education, public and private) can act as a recognised validation body. This law was adopted in April 2019³⁵ and entered into force on 1 September 2019 and is reported to have been largely influenced by the CR³⁶.

- Italy is an example of a comprehensive system being designed and introduced following the CR recommendations³⁷. The Italian VNFIL system was designed in response to the CR in the context of wider labour market reforms³⁸. Law 92/2012 defines for the first time in Italy the validation of non-formal and informal learning, as one of the key elements to ensure and implement lifelong learning, establishing rules and regulatory requirements (standards) concerning the characteristics of the system and the stakeholders involved, ensuring transparency, usability and broad accessibility of validation/certification services. Law 92/2012 is implemented through Decree 13/2013 on the validation of non-formal and informal learning and the national system of skills certification, providing a national and comprehensive range of qualifications from all educational sectors and those with legal value, including professional and regulated qualifications. It also aimed at increasing the professional competences acquired at work, as well as those acquired in leisure time in order to promote mobility, to foster the meeting together of demand and supply in the labour market and to increase learning transparency and the relevance of certifications at national and European level³⁹.
- In Portugal, all general education (GE) levels, VET and high education (HE) sectors are covered⁴⁰. Validation procedures in the third sector are part of the arrangements that exist in general education and VET RVCC⁴¹. As for the labour market area, the *Qualifica* programme launched in 2017 targets low skilled adults (unemployed or employed) and young people NEET⁴². the RVCC system has been in place in Portugal since 2000 and has been overhauled multiple times since. The CR inspired the expansion of the RVCC services, particularly with the *Qualifica* programme.

The contribution of the CR to VNFIL availability across the three areas is less obvious in cases where arrangements cut across **multiple legal and procedural frameworks** that together provide comprehensive coverage of all areas. The Expert Group discussions also found that institutional fragmentation has restrained the CR's effectiveness in many countries.

This is more commonly found in Member States with systems predating the CR (DK, FI, SE⁴³):

- In Denmark, a systematic expansion and revision of VNFIL procedures has been taking place – even before 2012 – based on evaluations, independently of the CR⁴⁴. Denmark is otherwise characterised by several complementary mechanisms and laws that collectively provide a comprehensive VNFIL system (on VET, AE, third sector, labour market).

³⁵ *Decreet betreffende een geïntegreerd beleid voor de erkenning van verworven competenties*, 26 April 2019

³⁶ Based on an KII in BE-nl

³⁷ 2018 European Inventory Country Report for Italy

³⁸ ISFOL Agenzia Nazionale LLP “*Trasparenza delle qualificazioni e delle competenze*” Ed. Isfol 2017

³⁹ Based on a KII in IT

⁴⁰ 2018 European Inventory Country Report for Portugal

⁴¹ Recognition, Validation and Certification of Competences

⁴² Portugal case study: *Programa Qualifica*, Validation and guidance study, Cedefop 2019

⁴³ This could be due to the fact that Nordic countries cooperate regarding the development of validation.

⁴⁴ 2018 European Inventory Country Report for Denmark, p.7

- Finland also has different regulations for VNFIL procedures in different sectors⁴⁵. However, the validation arrangements in Finland were already comprehensive before 2012, but the CR has fed into discussions to modernise approaches and improve the deployment of VNFIL systems⁴⁶.
- Sweden has a multitude of frameworks covering different sectors. VNFIL systems cover all educational levels, often combined with additional education and training to cover skills gaps, to result in a qualification or certification. HE procedures also exist but are commonly used to provide access to HEIs rather than a qualification. Specific VNFIL initiatives to support the labour market integration of newly-arrived immigrants have been introduced since the adoption of the CR (e.g. *Snabbspåret* or 'Fast Tracks'). In the third sector, validation is through *Folkbildning*, a liberal/civic adult education provided to adults, which largely focuses on validation of generic skills and competences. This is a 'parallel' educational pathway to formal system, with strong connections to various NGOs covering most of civil society⁴⁷.

The remaining **22 Member States cover some areas, to varying extents**, often with specific choices made to not extend validation to certain sectors. As the following examples show⁴⁸, most Member States are responding to specific contextual and national challenges and issues through VNFIL sectoral coverage, alongside specific national organisational structures, which have a more direct effect on the selection of sectors.

- Poland has a validation system that is focussed on the GE and VET sectors, including the VET system, for adults while the HE sector is less prioritised. Progress has been made since the CR in this respect, although availability and accessibility of procedures still vary across sectors⁴⁹. The Integrated Qualifications Systems (IQS) is still in the implementation phase, but public bodies are actively mobilising stakeholders in relevant sectors to help them create sectoral standards for qualifications for VNFIL.
- Croatia has a planned VNFIL system that will cover all areas of education, although pending implementation it is hard to assess the final form that the system will take in terms of coverage. The Law on the Croatian Qualifications Framework and the By-law on Validation make it possible to use the validation process for all educational sectors, although validation is really only legally possible within HE⁵⁰. Only one university has introduced the regulations so far, meaning that while theoretically validation is available it is not advanced in practice.
- Slovenia presents a unique case whereby all qualifications registered in the NQF can be acquired through VNFIL in principle, but in practice there is no system for GE and the system for HE depends on availability in universities⁵¹. However, the CR is reported as having influenced the setup of the Slovenian VNFIL system and the extent of its coverage, especially with the recent piloting of

⁴⁵ 2018 European Inventory Country Report for Finland,

⁴⁶ Based on a KII in FI. Recognition of prior and parallel learning is a core component of the Finnish VET system and this has been even more strongly emphasised by the 2018 VET reform.

⁴⁷ 2018 European Inventory Country Report for Sweden, p.7

⁴⁸ Gmaj I., Grzeszczak J., Kwiatosz, K., Pierwieniecka R., Walicka S. (2019). The validation of non-formal and informal learning in Poland. Implementation of the 2012 Council Recommendation. Warszawa: Instytut Badań Edukacyjnych. Retrieved from http://kwalifikacje.edu.pl/wp-content/uploads/publikacje/PDF/Raport-o-walidacji-efektow-uczenia-sie-w-Polsce_pop.pdf, P.42

⁴⁹ Based on a KII in PL

⁵⁰ Based on a KII in HR

⁵¹ 2018 European Inventory – Slovenia country report

services dedicated to the adult education and HE sectors⁵². All processes on all levels use validation for VNFIL, with acknowledgement that the CR have influenced the set-up of the system and the law on national qualification, particularly because it formed the basis of the piloting in AE and HE⁵³.

Many of the stakeholders interviewed for this evaluation study have admitted that the CR has raised awareness about VNFIL in many Member States since 2012, boosting the level of validation activity. This is especially true in the third sector⁵⁴ with 50 organisations in over 20 Member States involved in the validation of the skills and competences of volunteers. A further 40 tools for validation in the third sector have been developed⁵⁵, showing increasing availability alongside national level programmes. At the same time, many interviewees noted that not all tools comply with CR guidelines.

Results from the public consultation confirm this tendency, with respondents finding that VNFIL is often available to individuals through the context of specific projects and/or in relation to VET and hard skills, suggesting that comprehensive and nationwide procedures are seldom being experienced by individuals⁵⁶.

In summary, it remains difficult to assess the final extent to which the CR might have had an impact in terms of improving the availability of validation processes across all areas. The complexity and, in some cases, partial fragmentation of VNFIL arrangements in most Member States reveals that the CR is part of a partial process of expansion of comprehensiveness.

While not explicitly referring to comprehensiveness, the CR does constitute an incentive that can drive the expansion of comprehensive VNFIL arrangements. The Expert Group discussions indeed found that the CR had been used continuously as a reference point and frame for the structuring and systematisation of VNFIL arrangements, particularly in Member States where these were limited or non-existent prior to 2012.

4.1.1.2 Availability of VNFIL – coverage of the stages

Overall progress against baseline

Regarding use of the four stages of validation, although the 2010 and 2018 European Inventory data are not strictly comparable, the data provides an indication of how the four stages of validation are being used.

As shown in Table 4 data from 2010 shows that in total 17 Member States⁵⁷ used all four stages either individually or in combination within the following areas:

- Public sector initiatives in 16 Member States;
- Private sector initiatives in 5 Member States;

⁵² Based on KIIs in SI

⁵³ Confirmed in all SI KIIs

⁵⁴ Projects cited in KII: Euravon, Volcar, VaPoVo, e-VOC, ReValue, Volunteer Validation, Global Recognition, Lever, Lever Up, GREAT, CivCil, Volunteering Validation Highway, Destination E-validation, Innoval, I've Experienced, ImProvalm, Upval. The outcomes of these projects are/will be included in the Erasmus+ dissemination platform: <https://ec.europa.eu/programmes/erasmus-plus/projects/>

⁵⁵ An overview and analysis of these tools can be found on www.improval.eu

⁵⁶ OPC Question 1 on the availability of VNFIL. Based on open answers received from 88 respondents out of 262.

⁵⁷ BE, DE, DK, EE, EL, ES, FI, HR, IT, LT, MT, NL, PT, RO, SE, SI, UK

- Third sector initiatives in 5 Member States.

Table 4. *Member States using all four stages of validation individually or in combination within public sector, private sector and third sector initiatives (2010 European Inventory data)*

Member State	Public Sector	Private Sector	Third Sector
BE	✓	✓	✓
DE	✓		
DK	✓		
EE	✓		
EL	✓		
ES	✓		
FI	✓		
HR		✓	
IT	✓	✓	✓
LT	✓		
MT	✓	✓	✓
NL	✓		
PT	✓	✓	✓
RO	✓		
SE	✓		
SI	✓		✓
UK	✓		

Source: ICF 2010 European Inventory

The 2018 Inventory data provides a more nuanced overview of how the stages are being used across the three broad areas of education and training, labour market and third sector. Overall, all four stages of validation are used in 16 Member States across one or several of these three broad areas. As consistent with the situation in 2010, in some countries and in some areas and subsectors of education and training, stages are used on their own; in others they are used in combination.

As shown in Table 5 the 2018 European Inventory data shows that:

- In 9 Member States, all four stages are used in combination across each sub-sector of education and training (ET) where VNFIL arrangements are in place.
- For the labour market (LM) area, 10 of the 18 Member States with validation arrangements in place make use of all four stages.
- For the third sector (TS), 8 of the 18 Member States with validation arrangements in place make use of all four stages.

Table 5. *Member States using all four stages of validation in combination within the education and training, labour market and third sector areas (2018 European Inventory data)*

Member State	ET	LM	TS
BE		✓	
CY	✓	✓	
CZ			✓

Member State	ET	LM	TS
EE	✓		
FI			✓
FR	✓		
HR		✓	
IE	✓	✓	✓
IT		✓	✓
LV	✓		✓
MT		✓	
NL	✓	✓	✓
PL		✓	✓
PT	✓		
SE	✓	✓	
UK	✓	✓	✓

Source: ICF 2018 European Inventory

Contribution of the CR

While the CR defines the four stages of VNFIL (i.e. identification, documentation, assessment, and certification), this is in no way a prescribed route to ensuring coverage of all stages. Member States often cover the four stages through their own structured processes, which means these four stages are in most cases equivalent rather than identical to those of the CR.

The data gathered shows that while most Member States have organised their systems into four stages, this has happened through a range of different approaches. The following trends are observed:

- **The terminology varies** and is not consistently used across the Member States. In Bulgaria, for example, validation takes two main stages: a) identification of personal knowledge, skills and competences acquired by a candidate and b) recognition of professional qualification degree or partial professional qualification⁵⁸. In Spain, the stages of identification and documentation are captured under a single stage: counselling⁵⁹.
- Some Member States **have not aligned their stages to the ones suggested by the CR VNFIL, but the four stages are covered within their own validation processes**. In many cases, this will be due to pre-existing arrangements to the CR being used and the specificities of the national system. In Luxembourg, for example, identification and documentation phases are not usually carried out separately⁶⁰. In France, the process is also not quite aligned, with the procedure carried out using orientation, admission, and preparation of portfolio jury interview process⁶¹. In French-speaking Belgium (Brussels-Wallonia), the first stage focuses on information rather than identification⁶².

⁵⁸ 2018 European Inventory Country Report for Bulgaria

⁵⁹ 2018 European Inventory Country Report for Spain

⁶⁰ Inventory Synthesis Report 2018, p.19

⁶¹ 2018 European Inventory Country Report for France

⁶² Centre de Validation des Compétences (Bruxelles-Wallonie) : *Factsheet promotionel*.

- **Some countries have the four stages, but while in some initiatives they can be mandatory in others they are not.** In the Czech Republic, identification and documentation is not mandatory to apply for assessment and certification⁶³ and VNFIL system is by law limited the latter two stages. In Poland, it is obligatory for the certifying bodies to conduct the identification and documentation stages in the validation process if the requirement to do so is included in the description of qualification. Otherwise, it is up to them whether to include these stages as the Act on the Integrated Qualification System (IQS) refers only to the assessment stage as a mandatory part of validation⁶⁴.

Some countries have replicated the four stages outlined in the CR in their national VNFIL context or strategies. These are AT, BE-(nl), HR and IT:

- The Austrian validation strategy developed in 2017 is based on two pillars, covering all four stages. In Pillar 1, approaches to formative validation include a process of reflection on a person's competences with the primary goal of increasing their motivation in learning (covering identification and documentation). In Pillar 2, summative validation approaches are based on requirements and standards of the qualifications system (covering assessment and certification)⁶⁵. However, the validation strategy has only partly been implemented and current Austrian validation arrangements and initiatives do not always clearly address the four stages of validation. Depending on the initiative and the respective purpose of the validation action, certain phases are emphasised.⁶⁶
- In Belgium-Flanders, Article 3 para 1 of the decree in force since 1 September 2019 lists the four stages as they are in the CR⁶⁷.
- In Croatia, the Croatian Qualifications Framework (CROQF) Act of 2013 amended in 2018 takes into account the four stages of validation: identification, documentation, assessment, and certification, which will be implemented by means of CROQF Register and Ordinance on recognition and validation⁶⁸.
- In Italy, the decree of 30 June 2015⁶⁹ follows the four stages and also indicates the articulation of the process of identification and validation of non-formal and informal learning in order to define a common minimum path, which makes it compatible and harmonise existing regional procedures at the national level⁷⁰.

Finland is a particular case where the four-stage approach to VNFIL was already in use before the 2012. However, a representative from the education authority emphasised that including it explicitly in the CR gave greater clarity in practice. This view was echoed by a Finnish practitioner (VET provider) who noted that the four-stage approach now applies to the development of personal competence plans for VNFIL arrangements in VET since the reform of 2018.

⁶³ 2018 European Inventory Country Report for Czech Republic

⁶⁴ 2018 European Inventory Country Report for Poland

⁶⁵ BMB & BMWF (2017). *Strategie zur Validierung nicht-formalen und informellen Lernens in Österreich* [Austrian strategy for validation of non-formal and informal learning]. <https://bildung.bmbwf.gv.at/euint/eubildung/vnfil.PDF?69ai4p> (The policy document presents the Austrian strategy for validation of non-formal and informal learning. Only initial activities have been implemented so far.)

⁶⁶ 2018 European Inventory Country Report for Austria

⁶⁷ *Decreet van 26 April 2019 betreffende een geïntegreerd beleid voor de erkenning van verworven competenties* http://www.etaamb.be/nl/decreet-van-26-april-2019_n2019012586.html

⁶⁸ 2018 European Inventory Country Report for Croatia

⁶⁹ <https://www.lavoro.gov.it/documenti-e-norme/normative/Documents/2015/Decreto-Interministeriale-30-giugno-2015.pdf>

⁷⁰ 2018 European Inventory Country Report for Italy

A similar experience is found in Sweden. There, validation arrangements cover the four stages, but these are implemented and defined in different ways. In August 2018, the National Delegation for Validation was given a Terms of Reference that tasked it with proposing an overall definition of validation based on the CR on VNFIL⁷¹.

Within Greece and Slovakia, processes do not cover the four stages in a clearly structured way.

- In Greece, validation takes place in three stages (documentation, assessment, certification), with the overall focus being on assessment methods⁷². Although "identification" is not part of the procedure, learning outcomes will always be identified in one way or another prior to being documented.
- Slovakia's Lifelong Learning (LLL) strategy can be seen as a policy framework in the absence of a specific policy framework for validation (currently under consideration). They are registered as having validation arrangements, as individuals with five years of practice can apply for examinations in authorised institutions and can receive a certificate of compliance. In these two MS, despite the absence of comprehensive formalised processes covering the four stages, there are some underlying processes that cover the stages.

Findings from the Member States also reveal that assessment and certification are the most recurrent stages in any national VNFIL system. For instance, in the labour market area, assessment and certification takes place when VNFIL is linked to the attainment of an occupational standard whereby some form of credit may be awarded to the individual. As identified in the 2015 European Guidelines for VNFIL, in enterprises or economic sectors, certification may also involve issuing a licence allowing the individual to carry out specific tasks which officially confirms the achievement of learning outcomes against a specified standard⁷³.

This is somewhat reflected in the overall results from the public consultation which show that certification is most prevalently associated with validation processes (according to 28% – or 46 out of 163 – of the responding organisations) whereas documentation of skills is thought to be the least common formalised stage of a validation process (only 17% – or 28 out of 163 – of the responding organisations thought it to be available to a high extent)⁷⁴. A total of 34 respondents provided further comments, many among them describing hindering effects such as the limited possibilities for identification and documentation of skills compounded by concentration of VNFIL in specific sectors or professions rather than it being a universal service. It should however be noted that it is difficult to perform either assessment or certification activities without some form of documentation even if this is not an official step in a particular procedure.

In summary, there is relative diversity in the way validation stages are organised across the Member States. It shows that the contribution of the CR is usually acknowledged by Member States as either providing a reference for shaping or refining VNFIL procedures (pre-existing or developed since 2012) or as a useful tool to reflect on VNFIL processes and coverage. Only in a few Member States has it been directly use as the framework for modelling the four-stage process. It should be noted that it is important for MS to mix and balance the stages, including in the structure, to reflect the particular purpose of each validation arrangement. This flexibility to design

⁷¹ Ministry of Education and Research, Division for Upper Secondary and Adult Education (2019).
Implementation of validation arrangements in Sweden

Presentation of the Swedish one-off report on Validation, Brussels 5 November 2019

⁷² 2018 European Inventory Country Report for Greece

⁷³ Cedefop (2015) European Guidelines for validating non-formal and informal learning

⁷⁴ OPC Q4 on Effectiveness in relation to the four-stage approach

and implement responsive and flexible approaches is highlighted in the Guidelines referenced in the CR⁷⁵

4.1.13 VNFIL participation and accessibility

Overall progress against baseline

Progress in the use of VNFIL since the adoption of the CR is measured based on a comparison of trends in **participation** reported in the 2010 and 2018 European Inventory, triangulated with data collected from the current study.

As shown in Table 6, **only 6 Member States were able to provide information on participation in VNFIL in 2010. By 2018, this number had increased to 21 Member States** whereby information was gathered on trends in the number of validation applications by individuals in at least one subsector of education and training. It must however be noted that the data collected is generally not centralised and does not capture in a consistent or comparable way, different aspects of validation (type of qualification or outcomes achieved, user characteristics, success rate, length of procedure, etc.). In addition, data on outcomes and impact of validation remains limited. Previous European Inventory reports have highlighted the need to improve data collection around validation and the monitoring of validation-related initiatives⁷⁶.

Nevertheless, the data presented below shows an upward trend in the number of validation applications from 2014 in at least seven Member States (BE, EL, ES, FI, IT, LU, LV). In some countries, the trend in the number of validation applications varies by area (education and training, labour market, third sector) or has remained stable overtime. In 2018, a decrease in the number of validation applications has been reported in DK, FR, NL and RO.

⁷⁵ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 14

⁷⁶ Cedefop, European Commission, ICF (2016) Thematic Report on monitoring the use of validation of non-formal and informal learning

Table 6. Trends in the number of validation applications by individuals from 2010 - 2018

Member States	2010	2014	2016	2018
	Trend in the number of validation applications by individuals			
AT	No information	Depending on area	No information	No information
BE	No information	Increased	Increased	Increased
BG	No information	Increased	No information	Increased
CY	No information	Increased	No information	Increased
CZ	No information	Increased	Increased	Remain the same
DE	Depending on area	Depending on area	Depending on area	Remain the same
DK	Increased	Remain the same	Decreased	Decreased
EE	No information	Increased	No information	No information
EL	No information	Increased	Increased	Increased
ES	No information	Increased	Increased	Increased
FI	Increased	Increased	Increased	Increased
FR	No information	Remain the same	Decreased	Decreased
HR	No information	No information	No information	No information
HU	No information	No information	No information	No information
IE	No information	No information	No information	Remain the same
IT	No information	Increased	Increased	Increased
LT	No information	Decreased	No information	No information
LU	No information	Increased	Increased	Increased
LV	Remain the same	Increased	Increased	Increased
MT	No information	No information	Increased	Increased
NL	No information	Remain the same	Depending on area	Decreased
PL	No information	Increased	Depending on area	Depending on area
PT	Decreased	Decreased	No information	Increased
RO	Increased	Increased	Decreased	Decreased
SE	No information	No information	No information	Increased
SI	No information	Remain the same	No information	No information
SK	No information	Increased	Decreased	Increased
UK	No information	No information	No information	No information

Source: ICF European Inventory 2010-2018 triangulated with data from the current study

No data relating to **accessibility** of VNFIL has been collected under the successive Inventory studies.

Contribution of the CR

Findings show that the effect of the CR in expanding **accessibility** has been more pronounced in some Member States but rather limited in others, especially those that had well developed validation arrangements prior to 2012. What is meant by accessibility here is the ease with which individuals can participate in a validation procedure based on their NFIL experiences⁷⁷.

In terms of increased accessibility that is linked to the CR, Table 4.5 shows some mixed evidence.

Table 7. Overview of CR's contribution to progress on VNFIL accessibility across EU28

Increased accessibility			No increased accessibility	Information missing
CR had an effect	CR had some limited effect	CR effect unclear		
BE, BG, CY, DE, EE, IT, LT, LV, PT, SI	CZ, FI, IE, MT, NL, SE	DK, ES, FR, HU, LU, RO	HR, EL, SK, UK	AT, PL

⁷⁷ In accordance with the definitions of non-formal learning and informal learning included in the CR

Source: Own elaboration from Key Informant Interviews and desk research

Ten countries show evidence that the **CR has contributed to increased accessibility** of VNFIL services since 2012 (BE-fr, BG, CY, DE, EE, IT, LT, LV, PT, SI). Some examples are provided below:

- French-speaking Belgium reports that the 2014-2020 strategy for VNFIL aims to consolidate and expand the service, based on an amplification and differentiation of the validation offer in order to better meet the needs of specific groups of candidates, on the development of multi-stakeholder partnerships and a better recognition of the *Titre de Compétence*. This has been supported by a range of projects developed since 2014 covering different localities⁷⁸ and promoting the accessibility of validation to different audiences: employees in reconversion, people with mild physical and mental disabilities, and detainees⁷⁹.
- In Cyprus, the CR has contributed to raising the profile of VNFIL and of the dedicated body for VET qualifications under the SVQ (System of Vocational Qualifications). The development of a comprehensive Action Plan for the validation of NFIL in line with the CR started in 2013 – it was approved 2018 and will launch in 2020 as a ‘pilot mechanism’ to start with. Through this project and with the support of ESF funding, an increase in take-up of validation is expected.
- Germany has taken numerous steps to develop or improve access to VNFIL in accordance with the CR, particularly through the *ValiKom* initiative⁸⁰. There is also evidence that VNFIL local-level initiatives and pilot projects have been developed in line with CR principles in recent years.⁸¹
- In Italy, VNFIL processes are designed to cover the main occupational sectors in regional economies as well as vocational and educational training⁸². Italy has fully taken on board the CR in the context of its labour market policy reforms started since 2012. It has adopted the CR’s definition of NFIL and is thus developing a comprehensive offer of validation services.
- In Estonia, the focus of validation since 2016 has been in the adult education area. The Adult Education Programme 2016-2019 (*Täiskasvanuhariduse programm*) has focused on adult gymnasiums and the development of validation practices for the needs of adult learners. As a result of these recent developments influenced by the CR, validation is now present in all areas⁸³.
- Lithuania has recently made VNFIL possible in VET and HE against standards used in formal education. However, public awareness is low and VNFIL is currently not a priority for public funding⁸⁴.
- In Latvia due to extensive investments through allocated EU funds in supporting the validation procedure it is expected that the number of individuals accessing validation will increase in the upcoming years. Since the

⁷⁸ *Rapport d’activité du Consortium de Validation des Compétences 2017* (the projects referenced are: ValBrux for Brussels, ValWal for Walloon Region except Brabant-Wallon which was covered by ValBrab (financed by the ESF).

⁷⁹ Based on KII BE-Wallonia

⁸⁰ Germany one-off report (presented at the EQF AG meeting), 2018

⁸¹ Based on KII DE

⁸² Italian Ministry of Labour, ANPAL, INAPP joint response

⁸³ The 2018 European Inventory Country Report for Estonia

⁸⁴ The 2018 European Inventory Country Report for Lithuania, p.4

respective projects started in 2017, it is still too early to say to what extent numbers have grown⁸⁵.

- In Portugal the CR is cited as having a significant role in maintaining accessibility to VNFIL services, as these programmes were at risk of being abolished due to the financial crisis. The presence of the CR is cited as a key factor in maintaining the reduced services in this period.

There is also further evidence from Ireland and Sweden that the CR has been a catalyst in enhancing the accessibility of VNFIL across different sectors despite not leading to any procedural changes in the systems of either countries.

- In Ireland, validation is reported to have expanded across different areas thanks to the CR, feeding into discussions on improving provision of support to people at a distance from education and training opportunities, also to people in need of upskilling to enhance workforce competitiveness⁸⁶.
- In Sweden the CR is reported to have had indirect influence on the change in number of individuals accessing validation through awareness raising⁸⁷. The number of sector based VNFIL certification has increased by 60% between 2015 and 2018, and a similar increase is reported in IVET/general adult education (upper secondary level) between 2015 and 2017. Also, the number of unemployed people who have participated in validation as a labour market activation measure has increased by 30% between 2017 and 2018. The number of persons who make use of validation for entry into higher vocational education (HVET) has increased by almost 20% between 2016 and 2018. However, validation for credit award (exemptions) is still not very common in HVET, and data on the number of persons validated in HE is not available, neither for entry nor for credit award⁸⁸.

For other countries with **VNFIL arrangements that pre-existed the CR** (e.g. CZ, FI, NL, IE, SE), there has been **limited contribution of the CR to increasing accessibility** of VNFIL.

Four countries (FR, HU, LU, RO) have improved their accessibility but the contribution of the CR is unclear. For instance, the reforms of the VAE in France undertaken since 2016 show no apparent connection to the CR. In the case of Romania, the reforms are linked to the 2017 NQF Council Recommendation, which is clearly linked to the CR and thus an 'indirect' contribution could be identified.

Alongside this, some further issues have been identified through the research.

- Requirements or entitlements to undertake validation affect accessibility. The CR states that validation should also apply for skills acquired from life experiences (outside work). In France and Luxembourg, however, legislation clearly states that validation is only possible for skills acquired from work experience. The requirement for validation in Luxembourg is three years (or 5,000 hours) of professional experience⁸⁹. In France, the number of years of professional experience required to apply for validation was reduced in 2017 from three years to one year⁹⁰.
- Issues around accessibility to VNFIL in certain specific areas have also been raised by two EU umbrella organisations for the youth sector. Both note that

⁸⁵ The 2018 European Inventory Country Report for Latvia, p.17

⁸⁶ Based on a KII in IE

⁸⁷ Based on a KII in SE

⁸⁸ The 2018 European Inventory Country Report for Sweden, pp.16-17

⁸⁹ Based on an KII in LU

⁹⁰ *Décret n° 2017-1135 du 4 juillet 2017 relatif à la mise en œuvre de la validation des acquis de l'expérience* ; and based on a KII in FR

while accessibility has overall improved since 2012, there is still room for progress regarding the validation of transversal skills acquired in the volunteering and youth sectors which is also highly dependent on the visibility of such initiatives.

- While most Member States have completed mapping qualifications from EQF level 3 and upwards, there is still very little reference for qualification levels that are focused on linking basic skills to formal education routes (except in DK, BG, EE, EL, HR, RO, SE)⁹¹. On the other hand, some Member States are starting to link their Upskilling Pathways actions closely to the development of VNFIL arrangements (BE, CZ, CY, EE, ES, FR, LT, LV, PL) to provide learners with the possibility to bridge different learning routes, or to accumulate credits and partial qualifications to gain access to further learning opportunities⁹².

There is an overall positive trend reported on accessibility while certain issues relating to national or even sectoral (areas) specificities persist. The CR has certainly contributed to an increase in accessibility, but the extent depends highly on the national context and the specific measures that have been taken in response to the CR. A minority of countries, many of which had already established VNFIL systems prior to 2012, report the CR as having had little or no influence on accessibility reforms since 2012.

It should nevertheless be noted that perceptions on accessibility of VNFIL remain more positive in those Member States with longstanding systems than in those ones with more recent systems. Results from the public consultation⁹³ show that 93% of the respondents from France⁹⁴ and 91% of the respondents from Sweden⁹⁵ believed that validating skills acquired outside of formal education is a possibility in their respective countries whereas validation arrangements appear to be least known in Slovenia⁹⁶ (25%), Slovakia (33%)⁹⁷, and Spain⁹⁸ (57%). Across the EU, 72% of the public consultation respondents (or 188 out of 262 respondents) believed there are possibilities for VNFIL in their respective country.

While most Member States report an upward trend in VNFIL **participation**, many are unable to provide figures on users since 2012, yearly or otherwise. This data gap makes it harder to identify the exact contribution in CR to the increase in VNFIL participation.

Overall, it is not possible to establish whether increases in participation since 2012 are attributable to the CR, except maybe in the case of French-speaking Belgium (Brussels-Wallonia), Italy, and Portugal.

- In Belgium Brussels-Wallonia, a representative of the regional association of validation providers reports a sharp increase in validation between 2012 and 2018, with activity doubling. In 2012, 2,162 tests were conducted (1,458 credentials issued) and in 2018 4,489 tests were carried out (3,200 titles of competence issued). Alongside this, there has been an increase in the assessment attendance rate (+7.3% between 2012 and 2018) and an increase

⁹¹ https://ec.europa.eu/info/sites/info/files/file_import/implementation-report-upskilling-pathways_en.pdf p 16

⁹² https://ec.europa.eu/info/sites/info/files/file_import/implementation-report-upskilling-pathways_en.pdf

⁹³ OPC Question 1

⁹⁴ 13 out of 14 respondents from FR

⁹⁵ 10 out of 11 respondents from SE

⁹⁶ Only 3 out of 12 respondents from SI believed there are possibilities for VNFIL in their country

⁹⁷ 1 out of 3 respondents from SK believed there are possibilities for VNFIL in their country. The result for Slovakia is not statistically significant and should be interpreted with care.

⁹⁸ 8 out of 14 respondents from ES believed there are possibilities for VNFIL in their country.

in the success rate (75.6% in 2018)⁹⁹. These increases are attributed to new features such as additional support for candidates, a strengthening of the modular approach, or improved access to skills validation. The CR stabilised the pre-existing VNFIL system and provided the impetus for these new developments, with the introduction of the 2019 Cooperation Agreement updating and modernising the original cooperation agreement of 2003.

- Following the 2013 labour market reforms in Italy which covered the development of validation, the Emilia-Romagna region recorded in 2014 about 12,300 certificates of qualification awarded (compared to 8,700 in 2013), and about 4,100 certificates of competences awarded (against 3,400 in 2013). The abilities and knowledge diplomas awarded in 2014 reached 18,800 compared to 4,300 in 2013. These figures have been sustained in 2015 and 2016 according to the Emilia Romagna public employment agency¹⁰⁰. While it is still too early to have participation data at national level, it is believed participation in VNFIL has been on the increase since 2013¹⁰¹.
- In Portugal, a sharp decrease in validation enrolments occurred between 2012 and 2013 due to a reduction of the funding allocated to validation centres and the restructuring of the network. The introduction of the CR-inspired *Qualifica* programme led to a 43% increase in validation enrolments between 2016 and 2017 (from 88,321 to 125,893). The number of total certifications was 7,212 in 2016 and it increased to 9,290 in 2017. For the same period, the number of partial certifications decreased from 938 in 2016 to 837 in 2017¹⁰².

Coinciding with the above findings, the highest number of responses to the public consultation undertaken for this evaluation study were recorded in the United Kingdom where 61% (or 11 out of 18) of the respondents indicated having taken part in validation, and in Italy and Portugal where approximately one in four respondents¹⁰³ also indicated having participated in validation¹⁰⁴. Italy and Portugal were the countries with the highest number of respondents to the public consultation.

Only three other Member States provide data evidence showing an increase in VNFIL participation since 2012 (CZ, LU, MT) but with no evidence attributing it to the CR.

Conversely, some MS report **a decrease in participation since 2012**: DK, FR, NL. This may be related to the level of maturity of their respective VNFIL arrangements requiring new impetus to boost user numbers. There is also data evidence of a decrease in participation in Bulgaria despite the fact its VNFIL system is relatively new.¹⁰⁵ For instance it has been reported that the number of full and part qualifications awarded to candidates in 2016 was 105 and 152 respectively, falling to 60 and 57 in 2018¹⁰⁶.

Several developments which are external to the implementation of the CR have been identified as impacting on the number of individuals using VNFIL in certain Member States.

⁹⁹ Consistent with the progress reported in the *Rapport d'activité du Consortium de Validation des Compétences 2017*

¹⁰⁰ Data summarised by the regional government of Emilia-Romagna covering

¹⁰¹ Based on KIIs in IT

¹⁰² ANQEP (2018): Implementation of the 2012 Council Recommendation on Validation of Non-formal and Informal Learning. One-off report: Portugal

¹⁰³ IT: 6 out of 27 respondents; PT: 6 out of 23 respondents

¹⁰⁴ OPC Q3 Participation in VNFIL

¹⁰⁵ 2018 European Inventory Synthesis Report 2018, p.34

¹⁰⁶ Data refers to validation procedures undertaken by the vocational training centres licensed by NAVET (National Agency for VET). Data on certificates issued by VET schools and colleges (which can also undertake validation procedures according to the VET Act) is not available.)

- Changes in delivery structures and funding of VNFIL services can lead to decreases in applications, as was experienced in Portugal and the Netherlands. Netherlands experienced a decline following framework changes after several years of rapid growth and Portugal experienced a decline linked to the funding available to VNFIL providers¹⁰⁷.
- Macro-economic effects can increase validation applications temporarily, as was experienced in Ireland in 2012-2013 following the financial crisis.
- Cultural effects can be pronounced as some countries report that there is a cultural attitude that prioritises formal education for the acquisition of qualifications (HU, BG, SI) which tends to have an adverse effect on the number of individuals applying for validation procedures. In contrast, Finland has a longer validation history (since 1994) than many countries, and validation is presented as a method to reduce study time in formal education, increase enrolment in HEI, and as a way of saving resources¹⁰⁸.
- Success rates in validation can also have an effect. France has a relatively high reported success rate for validation applicants (77%)¹⁰⁹, while Luxembourg reports only 41% of applicants receive a qualification¹¹⁰. This 'evaporation effect' was mainly related to applicants not following up despite having submitted an admissible application.
- There are strong sectoral effects, with certain sectors in Member States having increased validation uptake depending on accreditation legislation or criteria (either EU or national) that require a qualification, such as security in Greece or elderly care in Spain. In France, there is a high rate of use in certain sectors (e.g. industrial manufacturing agents, adult Education trainers, and social workers)¹¹¹.

In summary, while there is evidence that participation in VNFIL has gone up since 2012 overall, it remains difficult to know the extent to which the CR has contributed to this. In addition, data evidence on an increase in validation take-up remains limited in most Member States. Monitoring systems for validation are still limited, and little is known on the level of acceptance of validation as a route for assessment or certification of skills¹¹².

4.1.1.4 Awareness of VNFIL opportunities, procedures and benefits – IAG

Overall progress against the baseline

The 2012 Impact Assessment of the CR reported that the most important perceived barriers for progress in validation concerned lack of awareness and lack of willingness to change established procedures and regulation, but also low awareness of validation possibilities in countries where validation opportunities exist¹¹³.

While the Inventory data for 2010 and 2018 are not entirely comparable regarding IAG (information, advice and guidance) provision, an overall comparison can be

¹⁰⁷ 2018 European Inventory Country Report for Portugal

¹⁰⁸ 2018 European Inventory Country Report for Finland

¹⁰⁹ 2018 European Inventory Country Report for France

¹¹⁰ 2018 European Inventory Country Report for Luxembourg

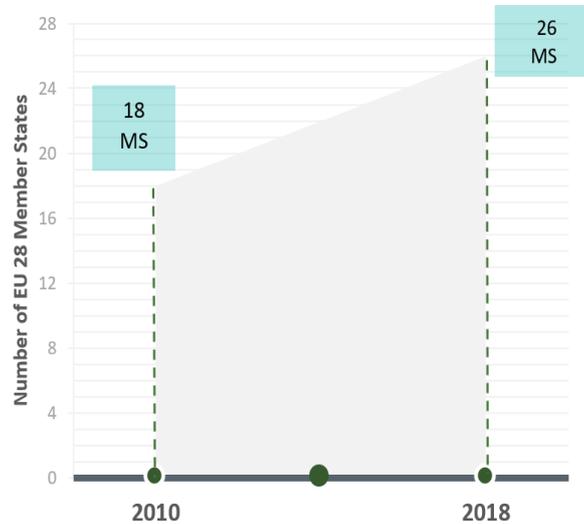
¹¹¹ *Inspection générale de l'administration de l'éducation nationale et de la recherche (2016) : Evaluation de la politique publique de validation des acquis de l'expérience*

¹¹² 2018 European Inventory – Synthesis Report

¹¹³ SWD (2012) 252 final

made¹¹⁴. As shown in Figure 6 and Figure 7 in **2018, 26 Member States** provided IAG to candidates in at least one subsector of education and training. This is an improvement from **2010 where provision for IAG** was generally included in validation arrangements **in 18 Member States**.

Figure 6. Number of Member States providing IAG to candidates on validation in 2010 and in 2018



Source: ICF 2010/2018 European Inventory

Figure 7. Overview of Member States providing IAG to candidates in 2010 and in 2018

AT	BE	BG	CY	CZ	DE	DK	Legend In place in 2010 In place by 2018 Not in place yet
EE	EL	ES	FI	FR	HR	HU	
IE	IT	LT	LU	LV	MT	NL	
PL	PT	RO	SE	SI	SK	UK	

Source: ICF 2010/2018 European Inventory

Contribution of the CR

A significant majority of Member States provide IAG to validation applicants, with the use of online portals being a prevalent source in most countries. Despite there being recognition of the importance of public outreach to publicise uptake of validation, **several countries report that they need improvements in IAG**.

There is a perception that there is **a lack of information about VNFIL mechanisms in place at national levels**, particularly for young people¹¹⁵. This could be linked in some countries to the fragmented provision of VNFIL services.

- In Estonia, IAG is only provided through the institution to which the applicant is applying and will thus differ depending on the institution applied to.
- In Greece, some new e-tools have been developed for PES services to communicate information, but these have not been used for VNFIL.

¹¹⁴ 2010 question: Do the validation arrangements generally include provision for information and guidance to candidates? (note indicators have been merged to provide an overall comparison for 2010). 2018 question: Is there provision for information and guidance to candidates in this sector?

¹¹⁵ Based on an interview with an EU umbrella organisation

- In Slovenia, there are two IAG systems covering qualification and adult education, but only the adult education IAG system has been clearly influenced by the CR¹¹⁶.

While a few good practice examples have been reported on IAG provision, it is currently not possible to ascertain whether these have been developed as a result of the introduction of the CR:

- Germany uses a 'one-stop-shop' approach through the website 'Recognition in Germany' focussed mainly on individual users but also with information for employers and stakeholders¹¹⁷.
- In Portugal, IAG is provided face-to-face by counsellors of the *Qualifica* centres to all individuals. Furthermore, the centres may give information about validation of non-formal and informal learning in sessions that take place in working contexts, such as in companies, as well as in other social contexts, such as in parish councils, non-profit associations etc. Besides other institutions, the National Agency for Qualification and VET provides information on RVCC, namely through its website. In Higher Education, each institution is responsible for sharing information and providing support regarding the validation of non-formal and informal learning¹¹⁸.
- In Finland, there is a mix between centralised and provider-based approaches. Public authorities and social partners are charged with raising awareness about the competence-based qualification system in which validation is a central feature¹¹⁹. A dedicated website provides information on the system itself, including good practice examples and assessment methods¹²⁰, with further support provided through regional employment centres and guidance and counselling service centres for adults.

From these observations, it appears that the CR has not yet fully realised its intended effect in this area. This is also somewhat confirmed by the results of the public consultation which reveal a discrepancy between responses provided by organisations and those provided by individuals having recently undergone validation, raising the issue of the effectiveness of IAG outreach. While 58% of the responding organisations (94 respondents) thought there was relatively easy access to IAG in their respective country and 60% (97 respondents) believed progress has been relatively good in this respect since 2012¹²¹, only 6% (or 4 out of 64) of the public consultation respondents having undergone validation indicated taking part in VNFIL after receiving IAG from their career guidance centre. A further 27% (17 respondents) indicated that opportunities for participation in VNFIL either came from an employer or as part of a labour market activation measure¹²².

In summary, the evidence suggests that in many cases IAG provision is either partial or follows different standards depending on the institution through which the applicant is accessing VNFIL services. The modalities and experiences described in the different

¹¹⁶ Based on KIIs in SI

¹¹⁷ Recognition of Prior Learning (RPL) Learning Package (2018).

https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---ifp_skills/documents/publication/wcms_626246.pdf – Mathou (2016) on BE, and Werquin

(2014) on SI

¹¹⁸ The 2018 European Inventory Country Report for Portugal, p.12

¹¹⁹ Mäkelä, Marjaana (2018). Process development for enhanced demonstration of competences: Recognition of prior learning as a mutual interest of stakeholders at Haaga-Helia University of Applied Sciences. *Eucen Studies – Journal of ULLL* | Vol 2 No 01 (2018)

¹²⁰ 2018 Update to the European Inventory on Validation – Country Report Finland

¹²¹ OPC Q6 and Q6a

¹²² OPC Q14

Member States tend to show that IAG provision needs to be flexible to adapt to individuals and their specific circumstances while effective outreach continues to be a challenge regarding certain groups.

4.1.15 Awareness of what VNFIL entails – Guidance and counselling during VNFIL

Overall progress against baseline

The European Inventory does not capture country data on the availability of guidance and counselling as part of a validation process. Only recent progress in this respect could be measured.

Data collected as part of the current study shows that **26 of the 28 Member States** have reported the existence of guidance and counselling provision in the context of a validation process. More specifically, as shown in Table 8 it is reported that in **15 Member States guidance and counselling is available throughout the validation process** and in **11 Member States** guidance and counselling is **available in only some stages** of the process. It is not possible to identify from the available data, the exact nature of guidance and counselling provision during a validation process or indeed certain stages of validation and what format this might take. This data should therefore be treated with a degree of caution.

Table 8. Availability of guidance and counselling during the validation process in 2018-2019

AT	BE	BG	CY	CZ	DE	DK	Legend
EE	EL	ES	FI	FR	HR	HU	
IE	IT	LT	LU	LV	MT	NL	
PL	PT	RO	SE	SI	SK	UK	
							In all stages
							In some stages
							Not available

Source: Own elaboration from Key Informant Interviews and desk research

Judging from the information presented in Table 9, it remains difficult to appreciate how much progress has been made since the introduction of the CR in 2012, with the CR having been reported as having an effect the provision of guidance and counselling only in a handful of Member States.

Table 9. Overview of CR's contribution to progress regarding the provision guidance and counselling during VNFIL across EU28

Guidance and counselling during VNFIL ¹²³		
CR had an effect	CR had limited effect	CR effect unclear
BE, BG, IT, PL	RO, SI	AT, DE, DK, EE, EL, ES, FI, FR, HR, LU, MT, NL, PT, SE, UK

Source: Own elaboration from Key Informant Interviews and desk research

Contribution of the CR

Guidance is often central to validation arrangements focused on individual learners. All respondent countries have a guidance process or requirement, but it is not yet a common practice throughout: it is often offered in education settings (IVET, CVET, higher education) or by PES, but less so for lower skilled unemployed adults¹²⁴. In general, this means that there is scope for further development of policies that

¹²³ No information for CY, CZ, HU, IE, LT, LV, PL, SK

¹²⁴ SWD 2019 (89) Implementation report upskilling pathways.

https://ec.europa.eu/info/sites/info/files/file_import/implementation-report-upskilling-pathways_en.pdf

converge around validation, guidance and upskilling in national strategies, creating win-win situations¹²⁵.

This is something the CR sought to address, however there is little information available to suggest that it has contributed to extend the provision of guidance and counselling as part of validation processes across all areas and for all groups (see Table 9 above).

Despite that, there is evidence that a greater role has been played by guidance professionals during the validation process since 2012, as the following examples show:

- In Poland, vocational guidance systems in schools have been revised and all legal arrangements regarding PQF – along with major education reforms in 2016 and 2018 – were informed by the CR¹²⁶.
- In Bulgaria, each person applying for VNFIL receives assistance from an individual consultant throughout the process. These consultants assist candidates in the preparation, completion and delivery of their portfolio, and are responsible for keeping candidate records and registering certificates following a successful validation procedure¹²⁷.
- In France, guidance is offered during validation but not compulsory: candidates can be assisted by a guidance professional to build their portfolio for validation or to prepare for their assessment if they so desire¹²⁸. While not being compulsory, this support depends highly on the availability of counsellors. In 2017, the reform of the VAE aims to improve their availability – not least through revisions to the financing model¹²⁹.
- In Luxembourg, data from 2014 shows that guidance significantly improves candidates' chances of successfully completing a validation process. Calls were made for a more systematic support of validation candidates to improve the quality of the portfolios presented for assessment and certification¹³⁰. As a result, guidance for validation candidates has been strengthened through the 2016 reform of vocational training¹³¹: support in the form of a group workshop and / or one or more interviews with a guidance practitioner is now offered, and the availability of guidance has been improved as it is now directly under the (financial) control and financing of the ministry¹³².
- In the Netherlands, all accredited VNFIL providers across all sectors of education and professional/labour market sectors have the obligation to offer good information and advice on why, how and when to enter a validation procedure¹³³.

¹²⁵ SWD 2019 (89) Implementation report upskilling pathways.

https://ec.europa.eu/info/sites/info/files/file_import/implementation-report-upskilling-pathways_en.pdf

¹²⁶ Based on a KII in PL

¹²⁷ According to Art. 11 (4), SG 96/2014. Confirmed in the 2018 European Inventory Country Report for Bulgaria

¹²⁸ Pielorz, Mona/Werquin, Patrick (2019): The French and German Validation Systems: Description. In: *Magazin erwachsenenbildung.at. Das Fachmedium für Forschung, Praxis und Diskurs*. Ausgabe 37, 2019. Wien. Online im Internet: <https://erwachsenenbildung.at/magazin/19-37/meb19-37.pdf>

¹²⁹ *Décret n° 2017-1135 du 4 juillet 2017 relatif à la mise en œuvre de la validation des acquis de l'expérience*

¹³⁰ <https://epale.ec.europa.eu/fr/blog/la-vae-au-luxembourg> Isabelle Houot EPALE

¹³¹ Law of 24 August 2016 amending the law of 19 December 2008 governing vocational training

¹³² <https://epale.ec.europa.eu/fr/blog/la-vae-au-luxembourg> Isabelle Houot EPALE

¹³³ 2018 European Inventory Country Report for the Netherlands

In summary, the effects of the CR in improving guidance during validation do not appear to be significant despite overall progress in this regard since 2012. The public consultation results¹³⁴ seem to confirm this finding with 58% (or 95 out of 162) of the responding organisations believing that there is relatively good access to guidance during validation while only 55% (80 respondents) thought that progress has been relatively positive since 2012. Trends on progress achieved in this regard are somewhat less positive when looking at the public consultation responses provided by individuals having recently undertaken VNFIL¹³⁵: only 37% (23 out of 63 respondents) indicated they were well guided throughout the process and a further 27% (17 respondents) thought the guidance they had could have been better.

4.1.1.6 VNFIL targeting disadvantaged groups

Overall progress against baseline

Although the 2010 and 2018 Inventory data are not strictly comparable¹³⁶, triangulation with data collected as part of the current study indicates that opportunities for VNFIL are available to certain target groups in more Member States in 2018 compared to 2010 (see Table 10).

The 2010 Inventory revealed that for most countries, there is a tendency to target validation initiatives to disadvantaged groups, forming part of broader strategies to improve social cohesion, including through the promotion of employment and equal opportunities.

The 2018 Inventory focused on the three main target groups covered under the Upskilling Pathway Recommendation – specifically, adults with low skill levels, young people not in education, training or employment (NEETs) and long-term unemployed people (LTU). It shows that most Member States currently have VNFIL initiatives that target specific disadvantaged groups, with the most targeted groups being low-skilled adults and the long-term unemployed.

Table 10. Initiatives targeting disadvantaged groups across Member States in 2010/2018¹³⁷

Target group	Available in 2010 ¹³⁸	2018			
		Fully developed initiatives	Initiatives in development	No initiatives	No information
Low-skilled adults ¹³⁹	BE, ES, FI, IE, LV, NL, PL, UK (8)	AT, BE, BG, DE, DK, FI, FR, HU, IE, IT, LV, LT, MT, NL, PT, RO, SI*, UK (18)	CY, CZ, EE, EL, HR, PL (6)	ES, SE (2)	LU, SK (2)
LTU	BE, BG, FI,	AT, BE, BG,	CZ, EL, HR (3)	CY, EE, MT	LU, PL, SE,

¹³⁴ OPC Q7 and Q7a

¹³⁵ OPC Q15

¹³⁶ Data not exactly comparable. 2010: What targeted measures are in place? (Which groups are targeted? the low qualified, migrants, early school leavers, the disabled, etc.) 2018: Based on the data available, what groups make greater use of validation initiatives in this sector?

¹³⁷ KIIs cross-checked with the 2018 European Inventory thematic report: The role of validation in an upskilling pathway for young NEETs, adults with low skill levels and long-term unemployed

¹³⁸ 2010 European Inventory fiche question: What targeted measures are in place? (Which groups are targeted? (multiple choice answer)

¹³⁹ 2010 European Inventory fiche indicator: low qualified

Target group	Available in 2010 ¹³⁸	2018			
		Fully developed initiatives	Initiatives in development	No initiatives	No information
	IE, LV, NL, PL, SI, UK (9)	DE, DK, ES, FI, FR, HU, IE, IT, LV, LT, NL, PT, RO, SI*, UK (18)		(3)	SK (4)
NEETS ¹⁴⁰	BE, FI, IE, PL, SI, UK (6)	AT, BE, BG, FI, DE, IT, LV, LT, NL, PT, RO, UK (12)	CY, CZ, EL, HR, HU (5)	DK, EE, ES, FR, IE, MT, SE, SI (8)	LU, PL, SK (3)

Source: ICF 2010/2018 European Inventory triangulated with data from current study

Both the 2010 and 2018 Inventory reports examined in detail the use of validation for migrants and refugees. The latest data, triangulated with information from this evaluation study, shows significant progress in terms of VNFIL targeted at migrants and refugees: 23 Member States are reported to have had such arrangements by 2018 compared to only five in 2010 (see Figure 8).

Figure 8. Targeted initiatives for migrants and refugees 2010-2018



Source: ICF 2010/2018 European Inventory triangulated with data from current study

¹⁴⁰ 2010 European Inventory fiche indicator: early leaver

It was also possible to obtain further information on the provision of VNFIL targeting migrants and refugees in 2018 (see Table 11), which reveals that it takes place through project-based initiatives in most of the Member States with such arrangements.

Table 11. Type of VNFIL arrangements targeting migrants/refugees in 2010/2018 across EU28¹⁴¹

Available in 2010	Available in 2018			
	Arrangements open with no conditions	Partially open arrangements	Project-based initiatives	No information
AT, BE, IE, PL, UK (5)	FI, DE, NL, SE (4)	AT, DK (2)	BE, BG, ES, IE, FR, LU, MT, PL, RO, SK, UK (11)	CY, CZ, EL, ES, HU, IT, LV (7)

Source: ICF 2010/2018 European Inventory triangulated with data from current study

Considerable progress can also be observed between 2010 and 2018 regarding the availability of skills audits to facilitate disadvantaged groups access to validation. In 2010, possibilities for undertaking a skills audit existed in 11 Member States. In 2018, 25 Member States had skills audits in place as illustrated in Figure 4.8 below.

Table 12. Member States with Skills Audits in place 2010/2018

AT	BE	BG	CY	CZ	DE	DK	Legend In place in 2010 In place by 2018 Not in place yet
EE	EL	ES	FI	FR	HR	HU*	
IE	IT	LT	LU	LV	MT	NL	
PL	PT	RO	SE	SI*	SK	UK	

*Skills Audits no longer in place in 2018 in HU and SI

Source: ICF 2010/2018 European Inventory triangulated with data from current study

Contribution of the CR

There is a range of **VNFIL activities** targeted at disadvantaged groups as part of **activation measures**. This, however, by no means appears to be a universal trend and there are marked differences in terms of which disadvantaged groups benefit from validation across the Member States¹⁴². Again, there is no possibility of knowing whether the CR has had a decisive impact on these developments, especially as validation is also recommended in the Youth Guarantee, Council Recommendation on integration of the long-term unemployed into the labour market (2016).

For example, in recent years, many VNFIL initiatives have targeted **migrants and refugees** as a disadvantaged group. This is particularly the case in Germany, Finland the Netherlands and Sweden and is a direct consequence of the refugee crisis of 2015-2016 rather than an effect of the CR. Similarly, target groups such **low-skilled adults**, the long-term unemployed and (to a lesser extent) NEETs are often selected based on broader national strategies and priorities most often in reaction to wider contextual factors (such as the financial crisis).

The CR states that "disadvantaged groups, including individuals who are unemployed and those at risk of unemployment, are particularly likely to benefit from the validation arrangements". In response to this, a handful of Member States were reported to have explicitly developed VNFIL initiatives for disadvantaged groups as a

¹⁴¹ KIIs cross-checked with the 2018 European Inventory thematic report: VNFIL for migrants and refugees

¹⁴² 2018 European Inventory Synthesis Report

result of the CR: BE-fr¹⁴³ (disabled people and detainees); IT¹⁴⁴, PT¹⁴⁵ (low-skilled adults, NEETs and long-term unemployed) and SI¹⁴⁶ (low-skilled adults over 45 years old and unemployed low-qualified adults over 50 years old).

The picture is overall rather mixed, and this appears to be reflected in the results of the public consultation. Just above half the responding organisations (82 out of 162 respondents) believed that validation arrangements target disadvantaged groups (long-term unemployed, migrants, disabled persons) either to a high extent or to some extent in their respective country¹⁴⁷. In keeping with the trends observed in the research, 53% (or 71 out of 133) of the respondents who believed VNFIL to exist for disadvantaged groups in their respective country held the view that relatively good progress has been made since 2012 in this regard¹⁴⁸.

Regarding **skills audits for disadvantaged groups** and people at risk of unemployment, there is enough evidence showing these processes have recently gained increased attention at Member State level, with various countries developing skills auditing services since 2014¹⁴⁹.

Nearly all the skills audit initiatives reviewed in the Skills Audit Final Report (2018)¹⁵⁰ show that skills audits specifically target vulnerable or multiple-disadvantage groups (e.g. young people, NEETs, migrants and refugees) but not exclusively. The Skills Audit Final Report also found that practices targeting refugees and asylum seekers have grown recently, with some evidence of specialised practices focusing on the single target groups of refugees/asylum seekers identified, due to challenges concerning the level of their host country language and lack of documentation on past achievements.

As the 2015 European Guidelines for VNFIL note, the definition and interpretation of 'skills audits' is varied among European countries, although there is more coherence around their principal focus being on identification and documentation of learning outcomes¹⁵¹.

The effect of the CR on the provision of skills audits is mostly unknown, especially when they are a separate component from the validation process. In French-speaking Belgium, skills audits are part of the validation service offer to companies undergoing restructuring; the offer has been strengthened following the adoption of the CR-inspired 2019 Cooperation Agreement¹⁵². In countries such as CZ, PL and SK, skills audit services have been recently developed but these are systemically provided outside the scope of validation¹⁵³.

In summary, outside of specific initiatives targeting disadvantaged groups (pilot projects or standalone actions in countries with no overall VNFIL framework), the lack of monitoring data makes it difficult to appraise the extent to which general VNFIL

¹⁴³ Based on KII BE-Fr

¹⁴⁴ In the context of Decree 13/2013, confirmed by a representative of the Emilia-Romagna regional government

¹⁴⁵ Focal point of the *Qualifica* programme introduced in 2017

¹⁴⁶ 2018 European Inventory Country Report for Slovenia confirmed by a KII SI

¹⁴⁷ OPC Q8

¹⁴⁸ OPC Q8a. N=133 excludes those responding organisations who believed no VNFIL arrangements existed for disadvantaged groups in their respective country.

¹⁴⁹ 2018 European Inventory Synthesis Report

¹⁵⁰ European Commission (2018) 'Skills audits: tools to identify talent', Final Report, DG EMPL

¹⁵¹ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 42

¹⁵² Based on communications with representatives of the organisation responsible for coordinating VNFIL in BE-Fr (a famous example is the Caterpillar company in 2017)

¹⁵³ Confirmed by desk research and KIIs in CZ, PL, SK

arrangements across the Member States reach disadvantaged groups – there have been reports that disadvantaged groups are still not entering validation initiatives to a significant extent in many countries¹⁵⁴. A major challenge continues to be the barriers to entry that persist for disadvantaged groups such as cost, complexity and lengthiness of the processes, service fragmentation and the perceived value of validation in certain countries¹⁵⁵.

4.1.1.7 Quality assurance of VNFIL

Overall progress against baseline

In 2010, only 5 Member States had quality assurance frameworks (QAFs) specific to validation while 11 Member States applied existing wider QAFs to validation. By 2018, 13 Member States had QAFs specific to validation, and 15 Member States¹⁵⁶ applied existing wider QAFs to validation. Therefore, the main trend has been a move from the application of existing wider QAFs to the development of QAFs specific to validation.

Table 13. *Quality assurance of VNFIL in 2010 and by 2018*

2010	2018
Quality assurance frameworks specifically applied to validation	
BE, CZ, LT, PT, UK	BE, CZ, DK, DE, EL, ES, HU, IT, MT, NL, PL, PT, RO
Applied existing wider quality assurance frameworks to validation	
AT, BE, DE, ES, FI, HU, IE, LU, LV, SI, UK	BE, BG, CY, FI, DE, EL, ES, HU, IE, LU, LV, NL, PL, SI, UK

Source: ICF 2010/2018 European Inventory

A comparison between the approaches to the quality assurance in the above table of shows that Member States can and do apply different approaches to the quality assurance of VNFIL simultaneously (in BE, DE, EL, ES, NL in 2018). This is because the approach can vary across the subsectors of education and training and between the labour market and third sector. In the absence of a specific QAF, the quality assurance of VNFIL is supported by quality guidelines or codes, and/or devolved to awarding bodies.

Contribution of the CR

The CR mentions the importance of transparent QAFs to ensure credible and reliable VNFIL outcomes¹⁵⁷ and is supported by the 2015 European Guidelines for VNFIL which state that quality assurance arrangements should support the long-term implementation of validation in consideration of other aspects such as: fitness-for-purpose and consistency of the process; and reliability and trust in VNFIL results¹⁵⁸.

¹⁵⁴ 2018 European Inventory – Synthesis Report

¹⁵⁵ Ibid; confirmed through KIIs in BG, EL, ES, SK

¹⁵⁶ BE, BG, CY, FI, DE, EL, HU, IE, LV, LU, NL, PL, SI, ES, UK

¹⁵⁷ CR Art. 3(f)

¹⁵⁸ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 31-32

In view of the above, however, the CR is reported to have directly influenced QA processes in Belgium only: through the involvement of social partners and education and training practitioners in the QA of validation centres based on a multi-stakeholder collaboration logic in the case of Brussels-Wallonia¹⁵⁹; with the introduction of the 2019 Law in Flanders which formalises QA principles for the transparency and reliability of VNFIL outcomes¹⁶⁰.

A few other Member States have reported specific progress made on quality assurance of VNFIL processes since 2012, but there is no possibility to directly associate this finding to the implementation of the CR.

- In Austria, although there is no comprehensive quality framework and there are no common quality standards for VNFIL¹⁶¹, a thematic working group on 'quality' set up for the implementation of the validation strategy has issued a 'Catalogue of criteria for promoting the quality of validation procedures in the field of vocational and adult education and training in Austria' in 2018.¹⁶² In higher education, several steps have been taken to enhance quality of validation arrangements (AQ Austria, the agency for quality assurance and accreditation for Austrian HE institutions, carried out a project to further develop recommendations for the design of recognition and crediting procedures).¹⁶³
- France strengthened QA processes for VNFIL providers through the 2018 Law on Continuing Training. Certification by a quality certification organisation itself recognized by the national organisation COFRAC (*Comité français d'accréditation*) or by *France Compétences* (the national organisation responsible for the governance of the whole professional qualification system) based on a national standard¹⁶⁴ but with no apparent connection to the CR.
- Malta launched several QA initiatives since 2012, including the National Quality Assurance Framework for Further and Higher Education resulting from an ESF project entitled 'Making Quality Visible'. Another key deliverable was the Manual of Procedures for External Quality Assurance. These frameworks endorse the 2012 European Regulations for Further and Higher Education and the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET). EQAVET has been taken on board at a national level, resulting in the development of a Malta Quality Assurance Tool for Vocational Education and Training Providers¹⁶⁵.
- In the Netherlands, the National Quality Code for VPL (based on the 'European Common Principles for Recognition and Validation of Non-formal and Informal Competencies') was upgraded in 2016 to a tripartite governed quality

¹⁵⁹ Based on Expert group meeting discussions

¹⁶⁰ Based on KII in BE-nl

¹⁶¹ Federal Ministry for Education, Science and Research (2018). Validation of non-formal and informal learning in Austria One-off Report to the European Commission based on COUNCIL RECOMMENDATION of 20 December 2012 on the validation of non-formal and informal learning (2012/C 398/01), p. 22

¹⁶² BMBWF (2018). *Kriterienkatalog zur Förderung der Qualität von Validierungsverfahren im Bereich der Berufs- und Erwachsenenbildung in Österreich*. Version 1: Grundlage für erste Pilotphase im Rahmen der Arbeitsgruppe Qualität [Catalogue of criteria for promoting the quality of validation procedures in the field of vocational and adult education in Austria. Version 1: Basis for the first pilot phase within the Quality Working Group]. Wien, April 2018. https://bildung.bmbwf.gv.at/euint/eubildung/vnfil_kritkat.pdf?6fa4z6=

¹⁶³ The 2018 European Inventory Country Report for Austria

¹⁶⁴ 2018 European Inventory Country Report for France

¹⁶⁵ 2018 European Inventory Country Report for Malta

instrument including the endorsement of representatives of the government, employers and trade unions¹⁶⁶.

- In Portugal the National Agency for Qualification and VET has produced and disseminated a set of methodological guidelines and is working on a Reference Guidance for Quality Assurance in *Qualifica* centres. This Agency also runs monitoring meetings with practitioners in each *Qualifica* centre focusing on the practical implementation of SIGO¹⁶⁷ (e.g., when using Key Competence Standards or the creation of portfolios)¹⁶⁸.
- In Romania, uniform quality compliance standards for assessment and certification centres were approved in 2017¹⁶⁹. The standards cover in methodological and operational terms the process of accreditation and authorisation. These were introduced together with the establishment of the National Qualifications Authority (NQA) responsible for ensuring transparent monitoring and control systems¹⁷⁰.

Results from the public consultation¹⁷¹ show some degree of variety in terms of progress with and arrangements for QA: 30% (48 out of 162) of the responding organisations fully agreed that validation consistently meets quality standards and 28% (44 out of 159) fully agreed that validation produces reliable results in their respective country. In the meantime, 6% (10 out of 162) of the responding organisations believed that validation services do not at all meet consistently clearly established quality standards and 11% (18 out of 159 respondents) that they do not at all produce reliable and credible results.

Respondents on behalf of NGOs most frequently indicated that validation services in their respective country fail to consistently meet established quality standards (26% or 10 out of 38 responded 'to a little extent', and 11% or 4 responded 'not at all') or to produce reliable and credible results (13% or 5 responded 'to a little extent', and 26% or 10 responded 'not at all'). Conversely, respondents on behalf of trade unions most frequently agreed that validation services in their respective country meet established quality standards (86% or 6 out of 7 agreed to some or to a high extent) and produce reliable and credible results (71% or 5 out of 7 agreed to some or to a high extent).

Compared to 70% and 64% of the responding organisations agreeing with the two statements respectively¹⁷², the proportion of responding organisations sharing the same views was remarkably low in Italy (40%, or 6 out of 15 respondents agreed to some or to a high extent that VNFIL meets established quality standards whilst 28%, or 4 respondents agreed to some or to a high extent that it produces reliable and credible results) and Portugal (63%, or 10 out of 16 respondents agreed to some or to a high extent that VNFIL meets established quality standards whilst 44%, or 7 respondents agreed to some or to a high extent that it produces credible results).

Those respondents with the opinion that validation services consistently meet clearly established quality standards tend to associate this with the well-established legal frameworks and well-functioning implementation mechanisms¹⁷³. At the same time, a significant share of the respondents noted that there is no uniform, recognised system of validation in their respective country or that the systems are currently being developed.

¹⁶⁶ 2018 European Inventory Country Report for Netherlands

¹⁶⁷ Integrated system for information and management of education and training offers (*Sistema Integrado de Informação e Gestão da Oferta Educativa e Formativa*)

¹⁶⁸ 2018 European Inventory Country Report for Portugal, p.17

¹⁶⁹ Based on Decision no. 1247/12.09.2017

¹⁷⁰ 2018 European Inventory Country Report for Romania

¹⁷¹ OPC Q5

¹⁷² Q5.a: 113 out of 162 respondents; Q5.b: 102 out of 159 respondents

¹⁷³ Based on a total of 70 open answers received

In summary, the evidence gathered for this study tends to show that while quality assurance for VNFIL seems to have improved since 2012, such developments have mostly taken place in their various guises, particularly as the CR is not prescriptive on this aspect. There is to this date no country-comparative evidence on the robustness of quality assurance processes for VNFIL, which can also be explained by the many specificities of national systems and processes.

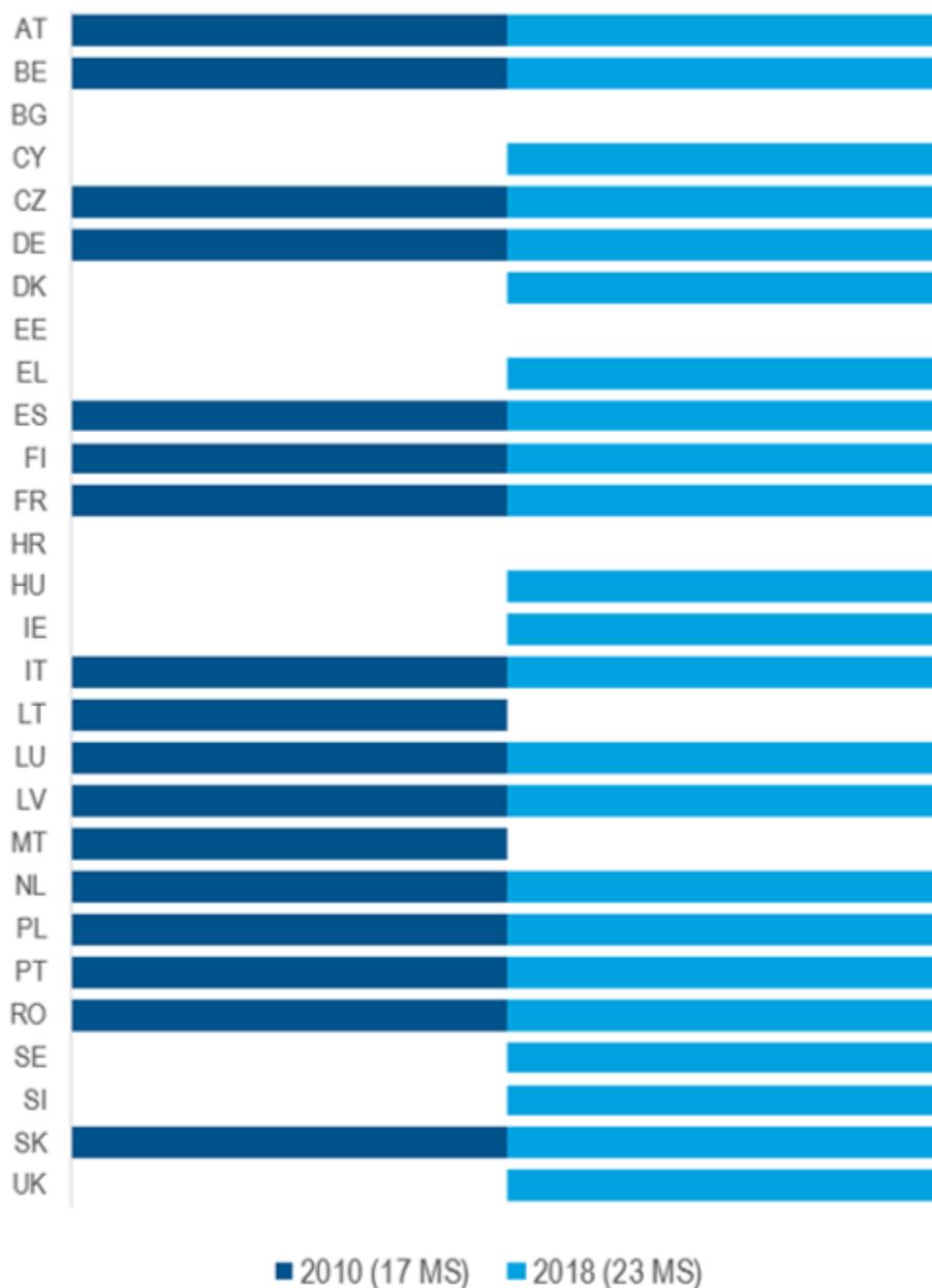
4.1.1.8 Professionalisation of VNFIL practitioners

Overall progress against baseline

Report on progress between 2010 and 2018 regarding the professionalisation of VNFIL providers is mostly possible despite indicators having slightly changed over the past Inventory editions¹⁷⁴. As illustrated in Figure 9, some form of mandatory professional requirements (in terms of training, experience, qualification) were reported in **17 Member States in 2010. In 2018**, mandatory professional requirements for counsellors, practitioners and assessors involved in validation were reported in **23 Member States**.

¹⁷⁴ 2010/14 question: Are there mandatory requirements to take on the role of a validation professional?
2018 question: Are there mandatory (imposed) requirements (in terms of qualifications, experience, training etc) on the following practitioners involved in validation in this sector?

Figure 9. Member States with a mandatory requirement for some form of professional training for practitioners involved in validation 2010-2018



Source: ICF 2010/2018/ European Inventory triangulated with data obtained from this study

Contribution of the CR

The opportunities for staff to gain relevant training, especially at the start of their involvement in VNFIL procedures, is a central way to ensure reliability and quality within the system. The 2015 European Guidelines for VNFIL make clear that guidance and counselling is crucial and that assessors should be trained in assessment and validation processes and knowledge about quality assurance mechanisms¹⁷⁵.

¹⁷⁵ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 34

Overall good progress has been made since 2012 on the provision of training opportunities for VNFIL staff to develop appropriate competences.

Most countries training opportunities are targeted at general staff (not exclusively those in VNFIL) and are usually part of institutional training systems. EL, PT and NL are an exception, with evidence that specific training is available.

- In Greece, training is provided for assessors and supervisors only in the context of running assessments. This development is linked to the implementation of the CR.¹⁷⁶
- In Portugal, annual training is provided to staff of the validation (*Qualifica*) centres on an annual basis, but it was argued even more specific training is required on e.g. how to convert learning experiences into learning outcomes¹⁷⁷.
- In the Netherlands, training for VNFIL counsellors and assessors is provided but this was already the case prior to the CR which has not any influence in this respect¹⁷⁸.
- Aside from the above developments, recent information has revealed that plans to provide specific training opportunities for VNFIL staff across all areas are under discussion in Denmark¹⁷⁹. Such plans have been initiated in Italy for the labour market area following the reform of the PES (entitlements to training for PES staff to hold validation-specific qualifications¹⁸⁰), but their implementation is proving difficult in certain regions where deeper structural changes are still required to modernise public service delivery¹⁸¹.

In a few Member States, the cost of training for practitioners is covered in at least one education and training sub-sector. For instance, Denmark provides paid leave for training, and some financial assistance is available in Greece, the Netherlands and Portugal¹⁸².

Within the labour market sector, only Belgium-Flanders covers the cost of training VNFIL practitioners, with the Netherlands providing some costs associated with training¹⁸³.

In the third sector, Italy entitles practitioners to paid leave and Belgium-Flanders covers the cost of training for IAG practitioners, with the Netherlands providing some costs associated with training¹⁸⁴.

The data and information gathered however does not make it possible to ascertain whether these developments across the three areas can be directly linked to the implementation (or influence) of the CR. Nevertheless, recent trends show that the 2015 European Guidelines for VNFIL appear to have been taken on board in a significant number of Member States as far as training for professionalisation is concerned.

¹⁷⁶ 2018 European Inventory Report – Greece

¹⁷⁷ Based on KII PT.

¹⁷⁸ 2018 European Inventory Report – Netherlands; confirmed by KII NL.

¹⁷⁹ 2018 European Inventory Report – Denmark (p.11)

¹⁸⁰ 2018 European Inventory Synthesis Report, p.32

¹⁸¹ Cefefop (2019) Validation and guidance – Italy case study.

¹⁸² 2018 European Inventory Synthesis Report, p.32

¹⁸³ 2018 European Inventory Synthesis Report, p.32

¹⁸⁴ 2018 European Inventory Synthesis Report, p.32

4.1.2 Use of validation results by individuals to learn or work in Europe

This section relates to the second overall and specific objective of the CR as presented in the Intervention Logic. The key principles associated are points a, h, i and j in Art.3.1 of the CR.

Each subsection relates to a question as listed in the TOR for this evaluation study. Each subsection begins with information on overall progress since the adoption of the CR in 2012 (i.e. overall progress since 2012 / against the baseline) and concludes with information on the contribution of the CR to the progress made.

Overall progress against baseline: based on a comparison of data from the 2010 and 2018 European Inventory reports on VNFIL, with the 2018 Inventory data verified against and complemented with data collected as part of this evaluation study¹⁸⁵.

Contribution of the CR: information relating to the extent to which the progress observed since 2012 resulted from the CR, particularly in relation to the following aspects:

- National validation arrangements are linked to national qualification frameworks (NQFs) in line with the EQF,
- Full or partial qualifications (or credit towards them) obtained through validation comply with the same standards, as those obtained through formal programmes, (also allowing access to formal education);
- National validation arrangements are linked to formal credit systems (such as ECTS and ECVET)
- National validation outcomes can be incorporated in European transparency tools;
- Validation arrangements are developed and implemented involving, and promoting coordination between a multitude of stakeholders (e.g. social partners, learning providers, civil society organisations etc.), contributing to a shared understanding of validation within and across countries

4.1.2.1 Links between VNFIL and National Qualifications Frameworks (NQFs) in line with the European Qualifications Framework (EQF)

Overall progress against baseline

The data from the 2010 and 2018 Inventory editions are mainly comparable despite some changes in indicators made between 2010 and 2018.

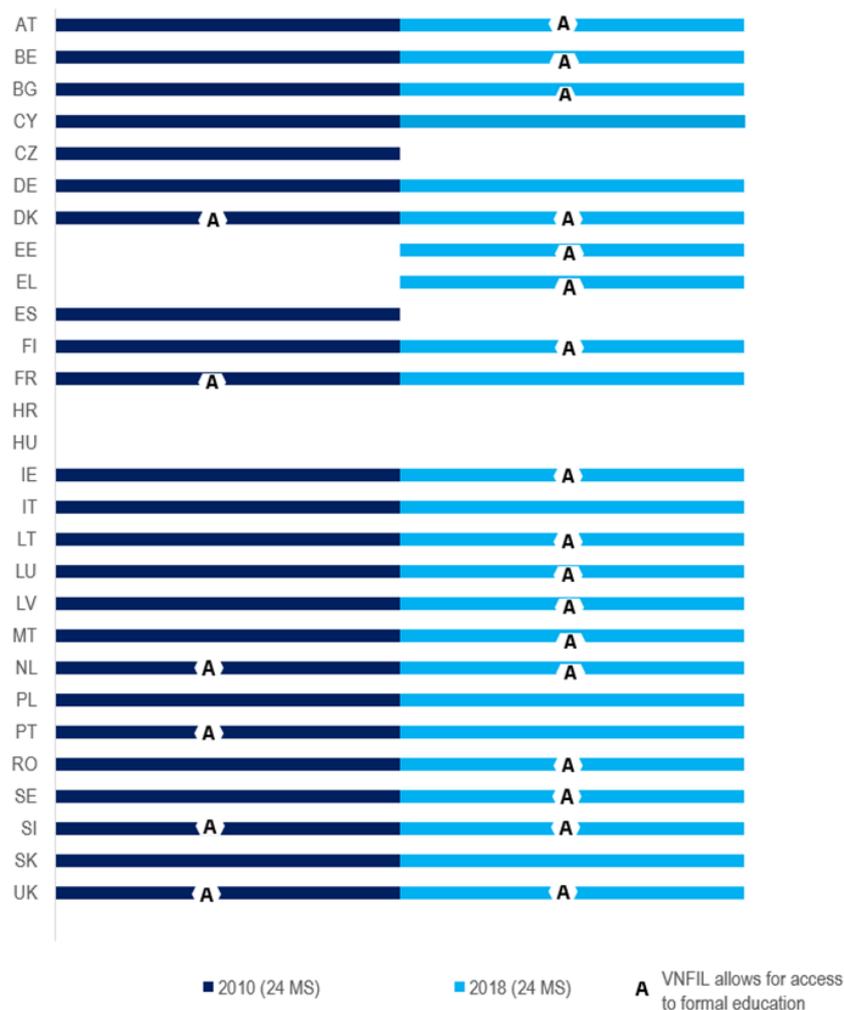
Regarding VNFIL link to NQF/EQF for the award of full and/or partial qualifications, **this was possible in 24 Member States in both 2010 and 2018, as show in Figure 10.**

The same figure also provides an overview of the Member States where the award of full/partial qualifications could be achieved **through VNFIL**. According to the 2018 Inventory, qualifications included in the Member States' respective NQFs can be obtained through validation in most cases across all subsectors of education.

Regarding access to formal education, the figure shows that in **2010**, learning acquired through non-formal or informal means could be used to access formal education covered in the NQF **in 6 Member States**. In **2018**, learning acquired through non-formal or informal means could be used to access formal education covered in the NQF **in 17 Member States**.

¹⁸⁵ Process of data triangulation

Figure 10. Links between validation and NQF in 2010 and 2018



Source: ICF 2010/2018 European Inventory

Contribution of the CR

The 2012 Impact Assessment referred to the need for strong mechanisms to recognise the skills and competences employees acquire both through on-the-job learning and non-formal training, as well as formal learning to support the individual's career development and mobility. In addition, the 2015 European Guidelines for VNFIL note that the integration of validation and NQFs can promote overall flexibility of education and training, particularly if validation supports exemption from parts of programmes and can promote vertical (between levels) and horizontal progression (across levels)¹⁸⁶.

The 2017 Council Recommendation on the European Qualifications Framework for lifelong learning (EQF)¹⁸⁷ indicates as one of its aims 'better linking formal, non-formal and informal learning and supporting the validation of learning outcomes acquired in different settings' and brings forward the principle the qualifications should be described in terms of learning outcomes.

¹⁸⁶ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 28

¹⁸⁷ It replaced the 2008 Council Recommendation that first formalised the learning outcome approach

In this context it is therefore important to note that VNFIL is strongly emphasised in the EQF Recommendation and thus highly interlinked with the CR, resulting in a difficulty in assessing the specific CR impact.

Nevertheless, **the CR is reported to have strengthened links** between validation and the NQF in:

- **Dutch-speaking Belgium (Flanders)** where validation is defined as linked to the NQF across all areas in the 2019 Decree;
- **Cyprus** with the creation of the System for Vocational Qualifications (SVQ) – an integral part of the NQF – which is being expanded to non-formal qualifications, improving availability and accessibility of VNFIL as per the objectives of the CR¹⁸⁸;
- **Italy** with Decree 13/2013 establishing a single framework for the certification of competences¹⁸⁹; and in
- **Portugal** through the *Qualifica* programme introduced in 2017¹⁹⁰.

Strengthened links between validation and NQF since 2012 have also been pointed out by respondents in several other Member States (CZ, DK, FI, FR, IE, LU, MT, NL, SE, SI, UK), but there is no evidence to attribute these developments to the CR directly.

- The Czech National Register of Qualifications (NSK) functions as a qualification framework for CVET with 8 levels (comparable to EQF levels) and each validation certificate contains a reference to the corresponding level of the EQF¹⁹¹. In the Czech qualifications system, the NSK is especially important in relation to the reference process, i.e. the linkage of the levels of the national qualifications system to the EQF levels¹⁹².
- In Denmark, in 2015, validation of prior learning was made mandatory for all adult learners aged 25+. Validation of prior learning is accessible up to NQF level 6¹⁹³.
- In France, validation outcomes are reported to now be better alignment to NQF, especially following the establishment of the France Competences national agency which has central responsibility for maintaining and updating the NQF.
- In Romania, since March 2019, descriptors of all formal qualifications strengthen link between validation and NQF¹⁹⁴.

Respondents from several other Member States have reported that links between validation and NQF only remain partial or not fully realised at this stage, in the sense that not all EQF Levels and not all areas are covered in practice

- The Austrian NQF has been designed as a comprehensive framework, hence it is closely linked to validation by design, i.e. to facilitate the validation of non-formal and informal learning. However, the inclusion of non-formal qualifications into the NQF is not considered a priority¹⁹⁵. The situation is similar

¹⁸⁸ Based on a KII in CY

¹⁸⁹ Based on KIIs in IT

¹⁹⁰ Based on a KII in PT

¹⁹¹ 2019 Update of the European inventory on the validation of non-formal and informal learning – country report: Czech Republic.

¹⁹² Zpravodaj Oborové skupiny, Number 16/ winter 2017, published on 19 December 2017 – about NSK; published by NUV

¹⁹³ EffectVPL project (2019). Policy Evaluation Report. Validation of Prior Learning. 12.09.2019. https://blogs.uni-bremen.de/effectvpl/files/2019/09/EffectVPL_Policy-Report.pdf

¹⁹⁴ Based on a KII in RO

¹⁹⁵ Based on a KII in AT

in Germany where the inclusion of qualifications from non-formal contexts in the NQF is foreseen but not yet implemented¹⁹⁶.

- In French-speaking Belgium (Brussels-Wallonia) the fragmentation of processes across the education and training and labour market areas means that links with NQF are not consistent depending on the EQF Level (2-4 are covered). The situation is similar in Bulgaria, with validation only linked to Levels 2-5 and VET¹⁹⁷ and in Lithuania where links also appear to be limited to VET¹⁹⁸.
- In Malta, links between validation and the NQF exist in theory but not in practice at EQF Levels 5-8, although this can depend on the study subject. The situation is similar in Estonia in HE where validation is not directly linked to the NQF/EQF but only some study programmes at Levels 5-8 may have a link to validation¹⁹⁹.
- In Romania, links between validation and NQF covering EQF Level 1-3 qualification are fully established, but it is not clear whether links occur in practice from Level 4 upwards.
- In Greece, Slovakia and Spain, links between validation and NQFs exist theoretically but VNFIL services have not been deployed yet. Slow progress has been reported in Spain and Slovakia to finalise the NQF while in Poland the inclusion of qualifications obtained through validation processes into their respective NQFs has progressed very well.

It was also reported that the CR has only resulted in minor progress in terms of encouraging the inclusion of qualifications obtained in volunteering activities into NQFs and in making validation more visible: in many Member States, young people are unaware of the possibilities they have to validate their volunteering skills²⁰⁰.

The results of the public consultation on the other hand reveal encouraging progress with nearly two-thirds of the respondents who had recently undertaken validation indicating receiving either a full or part qualification: 30% (or 19 out of 64) indicated receiving a full qualification while 33% (21 respondents) indicated receiving part of a qualification. Only 20% (or 13 respondents) indicated receiving neither following validation²⁰¹.

In summary, findings show that the CR has contributed to strengthening links between validation and NQF in a few Member States. The trend across most other Member States is that the successive EQF Recommendations (2008 and 2017) have accelerated the establishment of NQFs but that links with validation have not always followed in the implementation of procedures. This may be due to the fragmentation of VNFIL services in several countries (BE-fr, MT, SK²⁰²), to greater difficulties in achieving such links at a highly academic level (BG, EE, LT, RO) or to the fact that validation and the implementation of its link to the NQF is currently not considered a policy priority at the national level (AT²⁰³, DE²⁰⁴). However, the EQF referencing

¹⁹⁶ Based on a KII in DE

¹⁹⁷ Based on KIIs in BG

¹⁹⁸ Based on a KII in LT

¹⁹⁹ Based on a KII in EE

²⁰⁰ Confirmed by interviews with EU umbrella organisations in the youth sector and during Expert group meeting discussions.

²⁰¹ OPC Q18

²⁰² Based on Expert group meeting discussions

²⁰³ According to a KII AT, VNFIL is conceptually integrated into the design of the NQF but current NQF developments very much focus on the inclusion of non-formal qualifications (i.e. qualifications without a legal basis) into the NQF. In general, VNFIL or the implementation of the validation strategy was not

criteria refer to relating the NQF to arrangements of VNFIL and therefore all Member States will have referred to this relationship in their referencing reports.

4.1.2.2 Equivalence of standards between VNFIL qualifications and formal education qualifications

Overall progress against baseline

Data relating to the award of full qualifications achieved through VNFIL was slightly different in 2010 and 2018 but an overall comparison can be made.

Figure 11 reveals that:

- In **2010, 24 Member States** used the same or equivalent standards for VNFIL, in at least one sector of education, as the ones used in the formal education system.
- In **2018**, however, only **23 Member States** used the same or equivalent standards for VNFIL as in the formal education system.

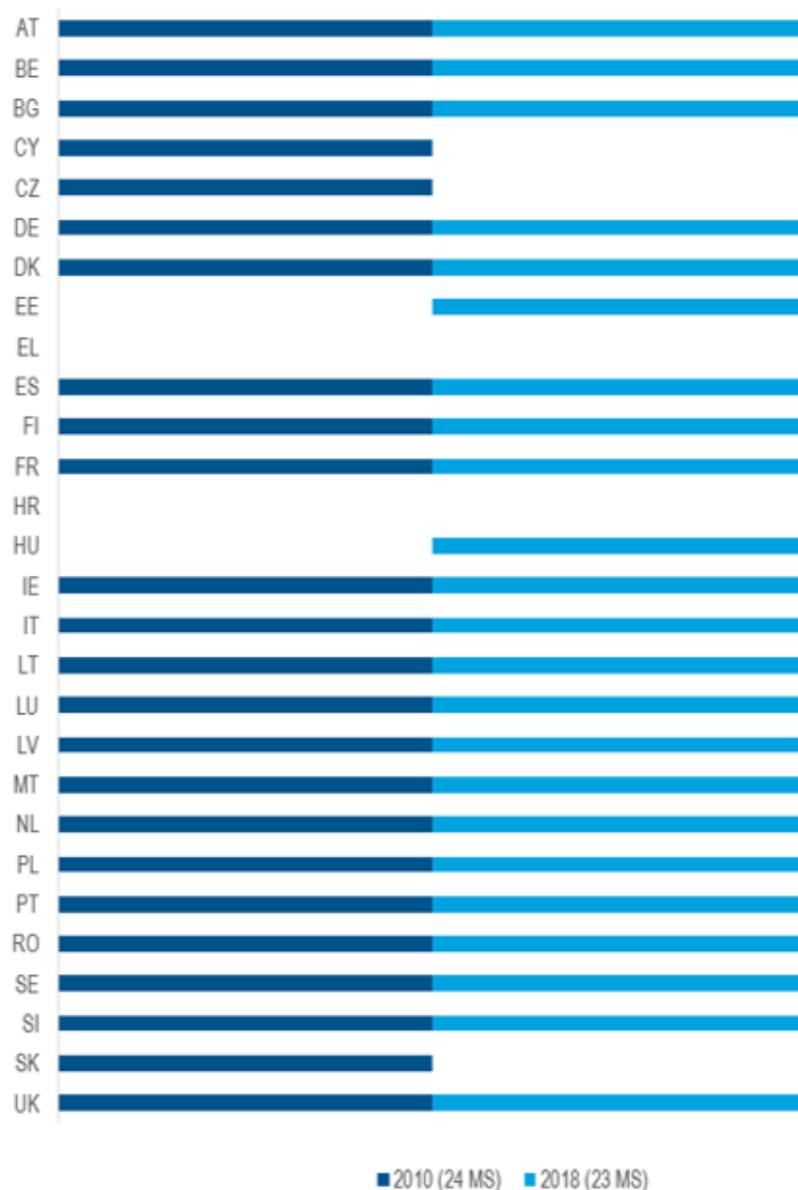
Differences between the situation in 2010 and 2018 can be observed in the case of Cyprus, the Czech Republic and Slovakia. This is due to ongoing policy reforms related to national qualification frameworks/occupational and/or educational standards in the respective countries²⁰⁵.

considered as a priority during the last two years (however, the latter is emphasised again in the government agreement published at the beginning of 2020).

²⁰⁴ Gutschow, K. & Jörgens, J. (2018). Herausforderungen bei der Einführung von Verfahren zur Validierung nicht formalen und informellen Lernens in Deutschland. Ergebnisse eines Szenario-Delphis. BIBB Report, 1/2018, p. 3.

²⁰⁵ See 2018 European Inventory country chapters for more detail.

Figure 11. Member States where standards for qualifications obtained through validation are the same/equivalent as standards for qualifications obtained through formal education in 2010 and by 2018



Source: ICF 2010/2018 European Inventory

Contribution of the CR

Most Member States have equivalence of standards between VNFIL qualifications and formal education qualifications, as reported in the 2018 Inventory. However, in most cases interviewees did not directly attribute this to the CR except in Dutch-speaking Belgium and Cyprus.

Achieving equivalence of standards between validation and formal education qualifications is still a work in progress in Croatia, Italy and Slovakia. Only in Italy is this work related to the implementation of the CR.

- In Italy, a system to ensure equivalence is yet to be made fully operational. This will complete the implementation of Decree 13/2013.
- In Croatia, existing HEI regulations do not allow any differentiation between qualifications based on the type of learning used to acquire them, full

equivalence is thus foreseen once the implementation of validation arrangements is completed²⁰⁶ (which was still not the case in 2018, according to Figure 11).

- Although Slovakia's NQF (SKKR), introduced in 2017, was meant to help make Slovakia's education and training system more flexible, qualification standards have not yet been embedded into the ISDV (Information system of further education) listing qualifications for which VNFIL is possible, and they are therefore not used for validation²⁰⁷. It is nevertheless planned that Level 3 certificates obtained from validation will soon have equivalence to formal education qualifications. For Level 6, the introduction of a 'professional bachelor's' with equivalence to a Higher Education bachelor's degree is also foreseen²⁰⁸ (no equivalence was reported in 2018, as per the Inventory findings and Figure 11).

In certain Member States such as Germany, Estonia and Poland, such equivalence is legally guaranteed via participation in an external/extramural formal examination – including for vocational skills – whereby successful validation candidates receive a full formal qualification.

Some countries have mixed systems that only offer partial equivalence. For countries with partial equivalence, this is due to their specific standards system.

- Slovakia has four sets of standards that are partly interrelated, with validation standards being related to the Ministry of Education Information system of Further Education (ISDV) being currently relevant. The qualifications obtained are still considered to be equivalent²⁰⁹.
- French-speaking Belgium (Brussels-Wallonia) has different standards from those obtained through formal education, but the qualification is equivalent²¹⁰.
- In Sweden, for educational qualifications the same standards are used. However, there are also standards developed by different business sector organisations without any equivalence in the formal system. For example, people may have their skills validated according to occupational standards and may be certified for certain tasks which are conducive to employment.

There is evidence that the CR may not have removed certain obstacles to achieving equivalence of standards in the labour market area and in HE in several Member States.

There have been observations that professional experience is more highly rated than formal education in certain professional sectors (e.g. ICT)²¹¹, including at the national level.

- It has been reported in Poland that qualifications obtained through VNFIL are sometimes rated higher on the labour market than formal ones. However, the fact that costs are often borne by employers and employees means that VNFIL is not a widespread practice²¹².
- Disagreements over equivalence of standards in the labour market area have also emerged in French-speaking Belgium between social partners and

²⁰⁶ Based on a KII in HR

²⁰⁷ Vantuch, J. (2018), 2019 Update of the European inventory on the validation of non-formal and informal learning, country report: Slovakia

²⁰⁸ Based on a KII in SK and confirmed during Expert group meeting discussions.

²⁰⁹ 2018 European Inventory Country Report for Slovakia

²¹⁰ 2018 European Inventory Country Report for Belgium

²¹¹ Based on Expert group meeting discussions

²¹² Based on a KII in PL

educational institutions, however multi-stakeholder negotiations to agree on a common standard have been taking place sector by sector²¹³.

Conversely in certain other Member States (BG, ES, SI) employers and other labour market stakeholders are reported to value formal education qualifications more than validation outcomes. This suggests that the labour market does not automatically support an aligned qualification system as cultural and social expectations continue to play a strong role in these countries.

Regarding HE, several Member States have reported that equivalence may exist in theory but that there is in practice a disparity between opportunities and the actual use or uptake of routes. This is the case in Greece and Malta in HE where there is a preference for qualifications being acquired upon completion of formal education programmes and following traditional assessment methods, despite the VNFIL pathways being available to achieve qualifications²¹⁴²¹⁵. In Luxembourg, full equivalence does exist but validation at EQF Levels 6-8 only grants access to HE programmes or courses²¹⁶.

In line with the trends observed, the public consultation results show only 38% (or 24 out of 64) of the respondents who had recently undertaken VNFIL indicated that the certificate which they obtained (or aimed to obtain) was equivalent to a formal education certificate while 47% (30 respondents) indicated this was not the case²¹⁷.

In summary, there has been progress since 2012 in achieving equivalence of standards between validation and formal education qualifications, but certain tensions do remain in this respect, mostly between educational institutions and labour market stakeholders. The extent of the CR's influence in alleviating such tensions is not entirely clear, except in certain cases possibly where its principles around multi-stakeholder collaboration have been followed.

4.1.2.3 Synergies with credit systems (such as ECTS and ECVET)

Overall progress against baseline

The 2012 Impact Assessment highlighted that credit systems are limited the recognition of learning experiences but without a clear link to validation and that while the EQF Recommendation promotes VNFIL, it does not provide further guidance on how to implement such processes²¹⁸.

Data from the 2010 and 2018 Inventory editions show that there has been a marked increase in the number of Member States where learning acquired through non-formal and informal learning can be used to acquire some credit in formal education. As presented in Figure 12 and Figure 13, in **2010, this was possible in only 11 Member States. By 2018 it is possible in a total of 24 Member States.**

²¹³ Based on an interview with a representative of the association responsible for organising validation in BE-fr and confirmed during Expert group meeting discussions

²¹⁴ 2018 European Inventory Country Report for Spain

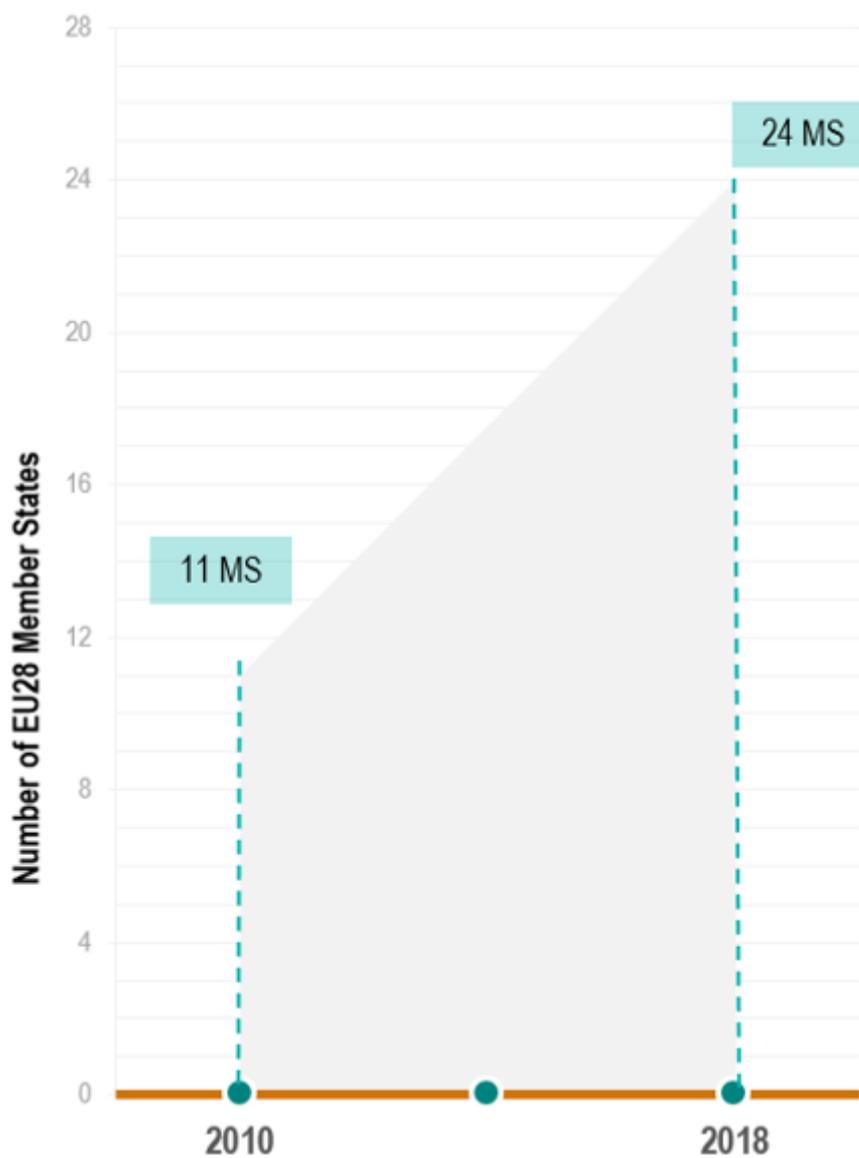
²¹⁵ Confirmed by KIIs in SI

²¹⁶ Confirmed based on a KII in LU.

²¹⁷ OPC Q18a

²¹⁸ SWD (2012) 252 final

Figure 12. Number of countries with reported synergies between validation and credit systems: 2010-2018



Source: 2010/2018 European Inventory

Figure 13. Member States with synergies between validation and credit systems: 2010-2018



Source: 2010/2018 European Inventory

Contribution of the CR

Among the Member States showing synergies with credit systems:

- Bulgaria allows for VNFIL outcomes to be converted into ECVET credits as per the VET Act (July 2014)²¹⁹ with ECVET being linked to the EQF. In validation procedures, professional skills acquired non-formal and informal learning are converted into NQF units relating to state VET standards²²⁰. Despite this, there is²²¹ no explicit reference as to whether ECVET credits can be used for validation arrangements.
- Denmark has a credit transfer system in general upper secondary education that is based on an assessment of an individual's prior learning and ECTS is used in higher education systems²²², although it is not possible to link this development to the implementation of the CR.

²¹⁹ The 2018 European Inventory Country Report for Bulgaria

²²⁰ Based on a KII in BG

²²¹ 2018 European Inventory Country Report for Portugal

²²² The 2018 European Inventory Country Report for Denmark, p.12

- In Portugal, validation in HE is linked to ECTS accreditation and the Bologna process.

For partially integrated credit systems, some Member States have a gap between their theoretical applicability and their implementation.

- In several Member States (AT, FI, IE, LT, LU) credit systems in the validation context are inconsistently used in HE. When they are, it is never to grant a full formal qualification, but only for access to a programme or for course exemptions.
- In Malta, ECTS is reported to be rarely used by universities in validation for Levels 5-8. ECTS credits are only awarded based on key competences, but not qualification standards²²³. However, a pilot project linking validation to ECTS in tourism studies is currently running²²⁴.

There are a few Member States where no synergies between validation and credit systems can be reported; in VET only (BE-fr, CZ, SK) or across the board (CZ):

- In the Czech Republic there is no credit transfer system for VET, although there are possibilities to accumulate learning outcomes achieved through VNFIL – documented by a certificate on attainment of a professional qualification, which lists not only attained professional skills and their relation to the occupation, but also the information on corresponding level of the EQF²²⁵. Although ECTS is used in HE, there is no system for VNFIL in HE²²⁶.

In practice, findings suggest a lack of clarity as to whether validation processes do result invariably in the award of ECVET or ECTS credits. Similarly, it is not possible to know whether these developments are attributable in any way to the CR.

It has been argued that synergies between validation and EU credit systems could be potentially improved through the definition of qualification standards attached to EU key competences for lifelong learning, especially transversal competences (e.g. acquired through volunteer work)²²⁷.

4.1.2.4 VNFIL outcomes can be incorporated in European transparency tools

Overall progress against baseline

Data relating to the use of European transparency tools was generated differently in 2010 and 2018, with only limited information available on the topic²²⁸.

In **2010, only a limited number of Member States** reported on European transparency tools being accepted by employers and educational institutions to document non-formal and informal learning, as illustrated in Table 14 below.

²²³ Based on Expert group meeting discussions

²²⁴ Based on a KII in MT

²²⁵ https://eacea.ec.europa.eu/national-policies/eurydice/content/validation-non-formal-and-informal-learning-20_en

²²⁶ 2019 Update of the European inventory on the validation of non-formal and informal learning – country report: Czech Republic

²²⁷ Based on Expert group meeting discussions.

²²⁸ 2010 question: To what extent are Europass and YouthPass accepted by employers and educational institutions in your country as tools to document non-formal and informal learning (high, medium, low).
2018 question: ‘Which European/national tools for documenting non-formal and informal learning are generally accepted by employers and educational institutions?’

In 2018, Inventory data reveals that **23 Member States** were reported to have some form of national or European transparency tool in place.

In terms of EU transparency tools only, **14 Member States** used Europass – of which 5 also used Youthpass – though it is not clear to what extent such tools are linked to the validation process (see Table 15) .

Table 14. *EU Transparency tools by level of acceptance by employers/education institutions for VNFIL in 2010*

2010 Inventory	Level of acceptance		
	High	Medium	Low
Europass	FI, HU, MT	AT, LV, RO	BE, HR, SE
Youth pass	FI, MT	LV, RO	AT, BE, HR, SE

Table 15. *Use of EU transparency tools for VNFIL in 2018*

2018 Inventory	Use of EU transparency tools for VNFIL
Europass	BE, HR, CY, CZ, EE, FI, EL, HU, IE, MT, NL, PL, SI, UK
Youth pass	CY, FI, EL, IE, NL

Source: ICF 2010/2018 European Inventory

Data collected for the **2018 Inventory** on the use of European Transparency tools tells a different story compared to data collected as part of the current study (see Table 16).

Data collected as part of the current study provides more recent insights into the use of EU Transparency tools to document learning outcomes from validation. The extent to which they are used in practice is not clear, which may explain discrepancies with the 2018 Inventory data presented in Table 15. In Austria for example, Europass can be used for VNFIL however the recently published validation strategy refers to the use of synergies with these transparency instruments, but systematic links with Europass have not yet been established. As such the data in Table 16 should be treated with a degree of caution.

Table 16. *Use of Transparency tools for VNFIL (current study)*

Use of transparency tools for VNFIL	
Used	AT, BE, CZ, DE, EE, EL, ES, IE, HR, LV, MT, PL, SE, SI
Not used	BG, FI, FR, HU, NL, RO, SK

Source: Own elaboration from Key Informant Interviews and desk research

Contribution of the CR

EU Transparency tools are used in Member States for validation, the most common at EU-level being the Europass portfolio as shown in Table 15 above. There remains considerable variety among the Member States as to the use of EU transparency tools.

The CR is reported to have influenced the use of EU transparency tools in Slovenia only where using Europass is since 2017 recommended as part of the validation documentation process in VET²²⁹.

Some Member States have a more specific use of these tools in VNFIL processes. Spain, for example, requires the presentation of a Europass CV to all applicants in the

²²⁹ Based on KIIs in SI.

procedure for the recognition of professional competences acquired through work experience and non-formal learning, with Youthpass also being accepted²³⁰. Sweden has ensured that documentation of qualifications and validation outcomes are designed to be incorporated into EU mobility tools, with responsibility for Europass documents divided between different authorities²³¹.

For the remaining Member States where the use of EU Transparency tools (Europass, Youthpass) has been reported, these are in fact used in the context of documenting learning outcomes more generally rather than specifically as part of VNFIL activities.

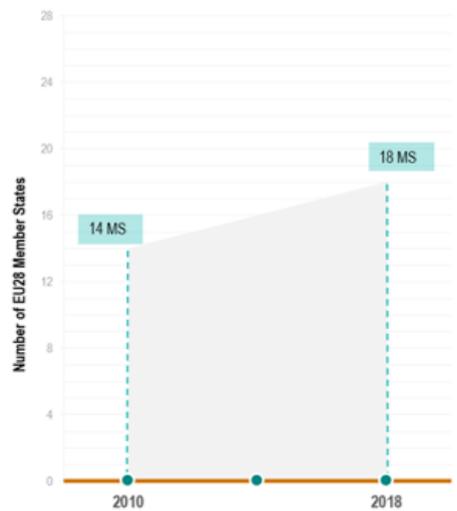
In summary, there is recognition in most Member States of the usefulness of EU transparency tools (such as Europass and Youthpass), but they are not specifically required as part of the validation process²³².

4.1.2.5 Multi-stakeholder approach ensuring a shared understanding of VNFIL within and across countries

Overall progress against baseline

While comparability of data between the 2010 and 2018 Inventory editions is rather limited in this regard, it is nevertheless possible to have an indication of the extent of progress²³³. In 2010, multi-stakeholder involvement was reported as relatively high - medium in 14 Member States²³⁴. Data collected for the current study reveals that VNFIL arrangements are developed and implemented based on **multi-stakeholder cooperation in 18 Member States** as shown in Figure 14 and Figure 15.

Figure 14. Number of Member States with multi-stakeholder collaboration arrangements in VNFIL 2010-2018



Source: 2010/2018 European Inventory data triangulated with data from current study

²³⁰ 2018 European Inventory Country Report for Spain, p.4

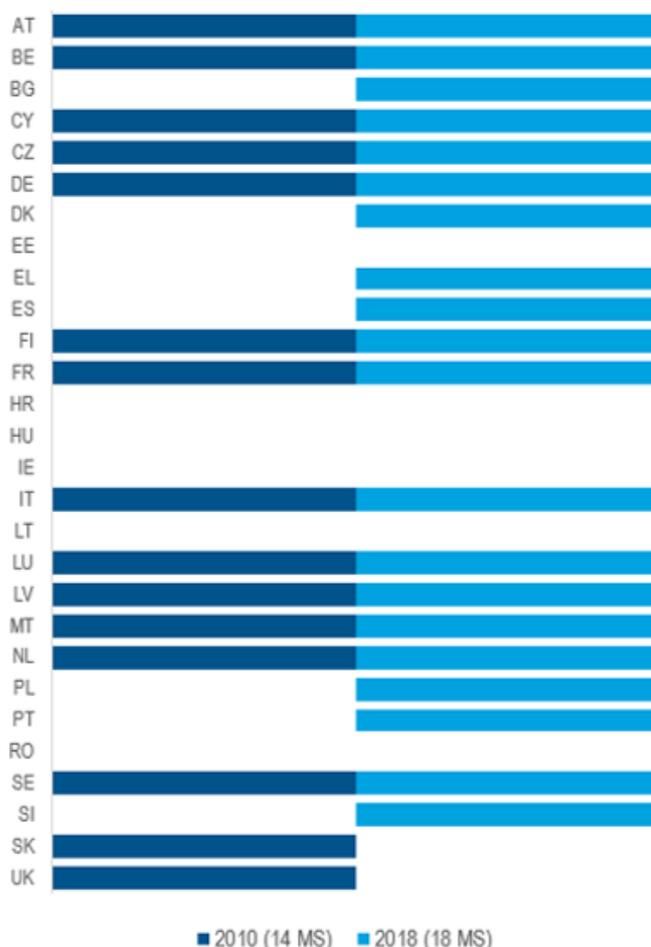
²³¹ Ministry of Education and Research, Division for Upper Secondary and Adult Education (2019). Implementation of validation arrangements in Sweden, Presentation of the Swedish one-off report on Validation, Brussels 5 November 2019, Ms. Malin Mendes, Ms. Carina Lindén, Ministry of Education and Research, p20

²³² 2018 European Inventory Country Report for Malta, p.3

²³³ Different questions on stakeholders in 2010 compared to 2018 but some form of overall comparison is possible

²³⁴ AT, BE, CZ, DE, FI, FR, IT, LU, LV, MT, NL, SE, SK, UK

Figure 15. Member States with multi-stakeholder collaboration arrangements in VNFIL 2010-2018



Source: 2010/2018 European Inventory data triangulated with data from current study

Furthermore, the 2018 Inventory synthesis report highlights that national organisations (e.g. national agencies and awarding bodies) are consistently involved in a large range of functions, and industry bodies along with employer organisations play a key role in setting standards. Provision of IAG is a function undertaken by most types of stakeholders. In the third sector, however, there seems to be more limited stakeholder involvement.

Contribution of the CR

Using a multi-stakeholder approach is crucial in order to build trust and ensure that the outcomes of validation are accepted in society and the labour market. Additionally, as validation is a complex process requiring the involvement of different actors that have varied responsibilities and functions, requiring communication and coordination between stakeholders to support validation services²³⁵.

The 2012 Impact Assessment presented a rather critical state of play reporting on the lack of coordination and coherence between Member States' validation systems, thus hampering the mobility of learners and workers. This was explained by the fact that VNFIL has been characterised by sectoral (e.g. sectoral skills passports) rather than transversal initiatives²³⁶.

²³⁵ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 24

²³⁶ SWD (2012) 252 final

This is why the CR aims to encourage the involvement of a multiplicity of relevant stakeholders in VNFIL, such as government organisations, national agencies, awarding organisations, PES, social partners (chambers of industry, commerce and skilled crafts, employer organisations, trade unions), education and training partners, youth organisations, youth workers, civil society organisations²³⁷. While some progress has been observed in recent years in this regard, the extent of the CR's contribution cannot be ascertained in most cases.

From those Member States reporting multi-stakeholder collaboration in the VNFIL context, this only appears to be associated with the implementation of the CR in French-speaking Belgium and Portugal.

- In French-speaking Belgium (Brussels-Wallonia), the *Consortium de Validation des Compétences* (CVDC), brings together the five most important public sector training providers, management and labour representatives from various sectors, and the public employment services (PES) for the development of the validation scheme. Multi-stakeholder cooperation has been significant in the alignment of validation standards with occupational and training standards developed in French-speaking Belgium. Since the implementation of the 2019 Cooperation Agreement directly inspired from the CR, priority occupations for the development of validation services can be used based on social partners' knowledge of their respective sectors. Employers' representatives are actively involved in the Consortium via the ad hoc Commissions working on the elaboration of the validation standards (COREF). Individual employers receive information on the skills validation scheme through direct contacts with Consortium consultants²³⁸.
- In Portugal, the legal framework for the *Qualifica* programme²³⁹ references the CR and emphasises the establishment of partnerships, at a territorial level, which encourage cooperation with employers, training institutions, organisations from the third sector and State-dependant organisations, in order to ensure validation of non-formal and informal learning²⁴⁰.

In several Member States where the CR is reported not to have influenced recent developments in multi-stakeholder collaboration, the mix of stakeholders is not consistent between countries. This is often determined by the country-specific institutional and organisational architecture supporting VNFIL services.

- In Austria, the development and implementation of the national validation strategy is based on broad stakeholder involvement. It is the task of a working group²⁴¹ which was established in 2013. The working group is headed by the ministry responsible for education and is composed of representatives of various ministries and interest groups. It is also supported by research experts. The existing validation procedures or measures involve different institutions and actors with different roles and responsibilities²⁴².

²³⁷ Inventory Synthesis Report 2018, p.28

²³⁸ Branka, J. (2016): Understanding the potential impact of skills recognition systems on labour markets. https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---ifp_skills/documents/publication/wcms_532417.pdf

²³⁹ Portaria no. 232/2016, 29/08

²⁴⁰ 2018 European Inventory Country Report for Portugal (p12)

²⁴¹ Linked to action line 10 and measure 10.3 of the LLL:2020 strategy

²⁴² Federal Ministry for Education, Science and Research (2018). Validation of non-formal and informal learning in Austria One-off Report to the European Commission based on COUNCIL RECOMMENDATION of 20 December 2012 on the validation of non-formal and informal learning (2012/C 398/01).

- In Finland, the CBQ²⁴³ system convenes stakeholders – both from the world of work and educational authorities – to work in close cooperation to describe the learning outcomes and include assessment targets, criteria, and methods of VNFIL procedures. The Finnish National Agency for Education which functions under the Ministry of Education and Culture, decides which qualifications belong to the national qualification structure and sets the requirements for each competence-based qualification²⁴⁴.
- In France, recent reforms²⁴⁵ led to the creation of the France Competences agency to allow for clearer collaboration with sectoral stakeholders to define qualification standards and register them in the NQF. This public agency, established in January 2019, and in charge of regulating and financing vocational training and apprenticeships, brings together several networks (including the Chambers of Commerce and the Chambers of Trades and Crafts).

In summary, there is a trend towards multi-stakeholder collaboration across the Member States, but the CR does not seem to have been the main factor behind this process in most cases. Multi-stakeholder collaboration will heavily depend on country-specific institutional arrangements and even traditions. This can also be explained by the fact that the CR is not prescriptive as to how such collaborations should take place and the 2015 European Guidelines for VNFIL emphasise that countries need to reflect on their own institutional frameworks and division of roles and tasks to benefit from synergies between stakeholders²⁴⁶. It thus remains difficult to appraise the extent to which current arrangements in most Member States contribute to fostering a common shared understanding of validation among all stakeholders. It has also been reported that multi-stakeholder collaboration remains too institutionalised and top-down in many countries, preventing a more proactive involvement from stakeholders from the labour market and the third sector²⁴⁷.

4.1.3 *Extent to which the follow-up and support actions envisaged by the CR have been taken by the Commission and Member States*²⁴⁸

The CR outlines a range of follow up and support activities (such as working groups, joint reporting, funding support) to help guide Member States' actions on validation in line with the Recommendation²⁴⁹.

These support and follow-up actions aim to achieve a shared understanding of validation across European countries, thus contributing towards the overall objective of enabling individuals to use validation to work and learn across Europe.

4.1.3.1 Follow-up actions

Follow-up actions include: EQF advisory group meetings, progress on implementation being included in relevant joint reporting exercises and the expertise of European agencies being mobilised to support implementation, including by reporting on validation in regular reports on NQFs.

Validation became a regular agenda item of **EQF Advisory Group meetings** as of early 2012. During 2012, the preparation of the CR was discussed at the EQF AG

²⁴³ Competence-Based Qualification

²⁴⁴ <http://uil.unesco.org/lifelong-learning/recognition-validation-accreditation/rva-country-profiles>

²⁴⁵ *Loi du 5 septembre 2018 pour la liberté de choisir son avenir professionnel*

²⁴⁶ Cedefop (2015). European guidelines for validating non-formal and informal learning. Luxembourg: Publications Office. Cedefop reference series; No 104. <http://dx.doi.org/10.2801/008370>, p. 25

²⁴⁷ Based on Expert group meeting discussions

²⁴⁸ Relates to Questions 2.1 and 2.2 of the Terms of Reference (and Activity 6 / Output 6 of the Intervention Logic)

²⁴⁹ Relates to Question 20 in the topic guide

meetings. From the 21st EQF AG meeting onwards (26-27 September 2013), Member States have had one representative for EQF and one for validation²⁵⁰. It should however be noted that since 2018, there have been fewer EQF AG meetings as work now tends to take place through project groups for aspects of the EQF Recommendation, whereas no such project groups exist for validation.

There is nevertheless overall appreciation among **EQF Advisory Group members** of the value of their regular meetings. Other stakeholders expressing a view on follow-up actions (in BE-nl, EL, FI, SI and SK²⁵¹) considered **peer learning activities** at EU-level – in general and in the context of the EQF AG – useful to learn about experiences and good practices in the field of VNFIL in different countries and to interact with experts. EU umbrella organisations also appreciate the information provided by the EU Commission and the discussions at the peer learning activities but argue the possibility of having a separate EQF AG group for VNFIL may not secure enough engagement from the Member States.

On a less positive note, a few stakeholders²⁵² expressed the view that the **effectiveness of peer learning activities on validation is negatively affected for several reasons:**

- They do not seem sufficiently coordinated with other relevant events such as those on Upskilling Pathways; and tend to gather the same members and experts where the same points are repeated
- They do not seem to have benefitted from the same level of visibility as events on related instruments such as the EQF or the Bologna process to secure political commitment for the successful implementation of the CR.

Since 2018, EQF AG meetings have included presentations of **one-off national validation reports**, as a way for national representatives to report on progress with CR implementation. Presenting a one-off national validation report to the EQF AG is voluntary, unlike the EQF referencing report, and is only meant to serve peer learning purposes²⁵³. The approach and common structure for the reports were agreed within the EQF AG. One stakeholder interviewed in Finland expressed the view that one-off reports are not considered to be the most useful instrument; they could have been used by the EU Commission for monitoring purposes in relation to the implementation of the CR²⁵⁴.

Views on the **follow-up activities of European agencies**, particularly Cedefop, were very positive. Several Member State representatives (BE-nl, CZ, EL, FI, IE, IT, MT, PL, SI and SK²⁵⁵) highly valued and expressed their appreciation for **Cedefop's expert support** as well as representatives EU-level umbrella organisations for youth and lifelong learning.

There was agreement that the **European guidelines for VNFIL** – last updated in 2015 – were useful in assisting with the conceptualisation and interpretation of the definitions (e.g. on non-formal and informal learning), processes and principles of the CR, particularly in the Czech Republic, Slovakia and Sweden²⁵⁶. Web traffic data

²⁵⁰ Some represented countries have the same representative covering EQF and validation

²⁵¹ This view was also confirmed during Expert group meeting discussions. Interviewees were not required to rate the effectiveness of the follow-up activities one by one and therefore no other MS expressed a view on EGF/peer learning activities.

²⁵² Discussed at Expert group meetings and based on KIIs with EU umbrella organisations.

²⁵³ EQF Advisory Group, 14-15 June 2017, Brussels Note AG 41-5

²⁵⁴ Interviewed with a representative of the national agency for education in Finland. No other stakeholders expressed a specific view on the effectiveness of one-off reports (presented at the EQF AG meetings)

²⁵⁵ As interviewees were not required to rate the effectiveness of follow-up activities one by one, stakeholders in the remaining 18 MS did not express a view on EU agencies.

²⁵⁶ Confirmed during Expert group meeting discussions, also by representatives from CZ, SE and SK attending the discussions.

obtained from Cedefop showed that the previous version of the European guidelines for validation was downloaded around 6,000 times every year between 2012 and 2016. In its year of publication, in 2016, the latest version of the Guidelines was also downloaded 6,000 times. However, there was a sharp decrease in the number of downloads of both the previous and latest version since 2017. Interestingly, the number of downloads for the latest version of the Guidelines in the Italian language is relatively high compared to other languages in which it is available (DE, ES, FR) apart from English.

There was also general appreciation that the **European Guidelines for VNFIL have been developed and updated in consultation with the EQF AG members**²⁵⁷.

No evidence could be obtained from the interviewed stakeholders as to the effectiveness of **Joint reporting exercises** in the implementation of the CR²⁵⁸. Only three ET 2020 Joint Reports have been published since the introduction of the CR in 2012; none of the three editions cover validation in depth.

4.13.2 Support actions

The CR envisaged support actions for the CR such as: the European Guidelines for VNFIL being updated, the European Inventory for validation being regularly updated and EU action programmes in the field of education, training and youth being used to support implementation.

The bi-annual updates of the **European Inventory on Validation** were rated as very informative of implementation progress by several stakeholders²⁵⁹. For the Czech Republic, it was highlighted that support materials are actively disseminated across national expert networks, and that plans to amend the Czech legal framework for validation is being considered based on the information contained in the latest European Guidelines for VNFIL and European Inventory on Validation²⁶⁰.

Web traffic data from Cedefop shows that the number of downloads of the 2016 Inventory was close to 1,500 in 2017 but then decreased by about half every year in the subsequent years (2018, 2019). The 2018 Inventory is soon to be released online and it can be expected that downloads will reach a high number.

EU funding programmes are reported to have been used to support the development of validation arrangements in more than two-thirds of the 28 EU Member States. However, they have not been consistently reported to have been used to implement the CR²⁶¹.

The **European Social Fund** has been the EU funding programme of choice for Member States to effectively support the design and development of validation systems and to build capacity for the implementation and delivery of validation services²⁶². ESF projects may have an explicit focus on VNFIL system design and development or include VNFIL activities as part of a wider intervention for lifelong learning or upskilling.

The **Erasmus+** funding programme has also proved useful to Member States in the context of cross-border collaboration for the development of VNFIL-related services, such as:

²⁵⁷ Confirmed during Expert group meeting discussions

²⁵⁸ Interviewees were not required to rate the effectiveness of follow-up activities one by one, none of them did express a view on Joint reporting exercise.

²⁵⁹ Based on KIIs in AT, BE, CZ, FI, HU, SI and SK. This was not a required response in the Country Data Collection Sheets, and the remaining 21 MS did not provide a response.

²⁶⁰ Based on a KII in CZ

²⁶¹ See Efficiency section 4.2 in this report for more information.

²⁶² See Efficiency section 4.2 in this report for more information

- The expansion of skills audits to vulnerable groups in the context of the VISKA (Visible Skills of Adults) project involving BE-nl and IE²⁶³.
- The improvement of quality assurance in VNFIL in the context of an EAEA-led transnational project running from 2015 to 2018 and involving AT, NL, PT, SK²⁶⁴.

Findings show a clear trend across the EU since 2012 in relation to the use of EU programmes and funding to either develop or modernise VNFIL systems. EU funding support to early-stage development is particularly marked among the countries joining the EU in or after 2004²⁶⁵.

4.1.4 *Extent to which individuals who have benefited from validation find it easier to engage in learning opportunities since the adoption of the CR*²⁶⁶

Based on the progress reported since the introduction of the CR and the extent of the CR's contribution to it, some general trends can be observed:

- In many Member States, validation processes can comprise short or complementary learning courses (typically at EQF Levels 1-3) adapted to candidates who lack certain basic skills to fulfil a qualification standard. However, the CR only appears to have had an influence on this process in Belgium, Italy and Portugal.
- Within the education and training sector, validation is most commonly cited as a way to obtain a full qualification for the CVET/IVET sub-sectors, validation is most commonly used to gain credits or partial qualification in HE.
- Due to difficulties in achieving full equivalence of standards between non-formal and informal education and academic standards at HE level (5-8) in almost all Member States, validation is primarily used to grant access to formal education and training routes, exemption from certain requirements, or as a way to gain credits towards a full award.

In Member States with a higher cultural value and acceptance of validation (e.g. DK, FI, IE, SE), there is evidence that validation routes in the labour market sector are highly valued by employers, social partners and employees for further training and upskilling. In Finland, VNFIL initiatives have long been promoted by trade unions in this respect²⁶⁷ while in Ireland validation is now being used by companies to retain their staff²⁶⁸.

For the third sector, it is common for formal education institutions and employers to not recognise learning acquired through volunteering or youth work in most Member States. This is because the recording of learning outcomes in the third sector is often limited to the (self) identification of skills and some unofficial documentation issued by youth organisations, leading many young people to leave these outcomes out of their CVs and applications for further learning or work²⁶⁹. At the same time, there is nothing that prevents these outcomes from being included. It appears that the CR has not generated a significant change in this regard.

²⁶³ <https://viskaproject.eu/project-description-hoofd/>

²⁶⁴ <https://eaea.org/our-work/projects/transnational-peer-review-for-quality-assurance-in-validation-of-non-formal-and-informal-learning-vnfil-extended/>

²⁶⁵ See Efficiency section 4.2 in this report for more information

²⁶⁶ Relates to Question 3.2 of the Terms of Reference (and Impact 1 of the Intervention Logic)

²⁶⁷ 2018 Update to the European Inventory on Validation – Finland country report

²⁶⁸ Based on a KII in IE; confirmed in Expert group discussions

²⁶⁹ Confirmed based on interviews with two EU umbrella organisations

In summary, many Member States report that validation allows for the award of full or partial qualifications leading on to possibilities for engagement in learning opportunities. There is some recognition that the CR has helped to establish learning outcomes as a 'currency' for validation across the EU, although it was judged that too little time has lapsed to make a valid assessment on this. It may be still too early to observe the extent of crossover between flexible learning pathways and validation processes.

On a positive note, however, results from the public consultation shows that respondents who recently underwent validation frequently appreciated the fact it gave them the opportunity to experience a truly personalised learning experience²⁷⁰.

4.1.5 Extent to which individuals who have benefited from validation find it easier to enter and move within the labour market since the adoption of the CR²⁷¹

Research undertaken in this evaluation reveals limited country-level evidence to suggest that the CR has led to an increase use of validation by individuals to improve their professional prospects. This demonstrate that progress in this regard might not have met the expectations of the 2012 Impact Assessment which foresaw the CR as enabling greater visibility of skills among the working population and thus improving employment and productivity²⁷².

For two Member States where such evidence is available (EL, IT), the CR is nevertheless regarded as having had a positive effect on professional mobility²⁷³.

- Italy conducted in 2015 a nationwide survey of validation beneficiaries. When asked if the validation process has influenced their current employment status, 63.1% of beneficiaries responded affirmatively emphasising that through the validation procedure they had been able to find a new job or to improve their search for a job and to better manage job interviews²⁷⁴. This can be considered as evidence that the validation system introduced in Italy in 2012/2013 based on the principles of CR is achieving its aims.
- In Greece, while the development of validation as per the CR principles has been a slow sector-by-sector process, it is believed that validation users in the concerned sectors are now finding it much easier to enter the labour market compared to previously²⁷⁵. Other experts have reported that individuals who have received a professional certification through validation in the private security service sector have been able to find employment more easily, including abroad, even though no formal reports or official data are available in this regard²⁷⁶.

Recent evidence of professional mobility being facilitated by VNFIL was also reported in Sweden and Spain but its connection to the CR could not be ascertained.

- In Sweden, surveys by the National Delegation for Validation have revealed that over two-thirds of employers see VNFIL as a tool for recruiting employees with the right knowledge, skills and competencies.
- In Spain, validation initiatives have been developed in certain specific sectors, a recent example relates to workers in elderly care requiring sectoral

²⁷⁰ OPC Q19, results based on the analysis of 23 open answers

²⁷¹ Relates to Question 3.1 of the Terms of Reference (and Impact 2 of the Intervention Logic)

²⁷² SWD (2012) 252 final

²⁷³ For the remaining 22 MS, no clear evidence could be provided.

²⁷⁴ INAPP 2015

²⁷⁵ Based on a KII in EL

²⁷⁶ According to the 2018 European Inventory – Greece country report

accreditation by the end of 2017, leading to an increase in VNFIL take-up for this profession²⁷⁷.

In the labour market area, most countries report that validation is used to gain full qualifications with equal value to those acquired through formal education routes. There is however some evidence that the acceptance of VNFIL as a qualification route may differ between professional sectors, which appears to fall short of the CR's intended objective of achieving comprehensive sectoral coverage.

Austria notes that individuals place high value on formative validation initiatives, although the value of outcomes for formal education and training or for the labour market is not clear²⁷⁸.

France notes that there are clear differences in VNFIL usage and acceptance between professional sectors, with the bulk of certifications being awarded for health and social care professions²⁷⁹.

The Expert Group discussion found that there is limited evidence on whether the CR enables individuals to use validation outcomes to enter the labour market, suggesting that greater efforts may be needed to raise social awareness of the benefits of validation.

There remain issues as to the acceptance of validation outcomes for certification in certain countries and sectors, which limits the achievement of the mobility objective of the CR. This is echoed in the results of the public consultation where respondents who recently underwent validation frequently indicated that recognition of validation outcomes remains an issue as far as their experience is concerned²⁸⁰.

Overall, it was argued that while there is a more common understanding there is still limited comparability between national systems in practice and very limited evidence of validation outcomes being used for intra-EU mobility purposes²⁸¹.

4.2 Efficiency

This section seeks to shed light on the evolution of implementation costs and resources used in the area of validation since the introduction of the CR in 2012 and in relation to the benefits this has generated. It also provides a reflection on the factors that can influence efficiency, whether they are linked to the CR or not.

4.2.1 Overview of CR implementation costs and benefits generated²⁸²

Information on the extent to which costs and benefits are directly attributable to the implementation of the CR has been overall rather scarce. Furthermore, monitoring data on expenditure is limited across EU28, cost structures offer little scope for comparison across the Member States, and cost-benefit analyses are rare in most countries.

Various other aspects connected to efficiency and the CR have therefore been considered for the analysis, broken down into subsections for ease of reading. This begins with a description of general trends in terms of funding frameworks for the provision of VNFIL across the Member States, and the extent of their cost-

²⁷⁷ The 2018 European Inventory Country Report for Spain, p.26

²⁷⁸ 2018 European Inventory Country Report for Austria

²⁷⁹ *Inspection générale de l'administration de l'éducation nationale et de la recherche (2016) : Evaluation de la politique publique de validation des acquis de l'expérience*

²⁸⁰ OPC Q19, results based on the analysis of 23 open answers.

²⁸¹ Based on Expert group discussions

²⁸² Relates to Sub-questions 4.1 and 4.3 of the Terms of Reference (4.3 on 'proportionality of costs' has been amalgamated with 4.1 'costs and benefits' to avoid repetition)

effectiveness where such observations are possible. This is followed by the presentation of evidence of the potential of ESF as an efficient framework or instrument for VNFIL provision at the national level since the introduction of the CR in 2012. A third subsection contains available albeit limited information relating to the proportionality of costs and benefits of VNFIL.

4.2.1.1 Funding frameworks across the Member States

Public strategies together with funding frameworks and dedicated government budget lines for VNFIL exist in a handful of Member States (BE, ES, FR, IT, LU, NL, RO). For Belgium and Italy, the funding frameworks may be directly attributable to the implementation of the CR.

- In Belgium, VNFIL provision is based on a collaborative model which facilitates the pooling of financial resources from various stakeholders. In Flanders, the regional government's ministries of education and labour have confirmed sharing VNFIL-related expenditure based on a legislative decree which was recently updated to reflect CR principles²⁸³. A similar setting exists in Brussels-Wallonia where the costs of VNFIL implementation are shared among public services via operators of continuing vocational training but also among the social partners in the context of the sectoral agreements, particularly for the development of VNFIL pilot projects²⁸⁴ and for the organisation of validation in companies²⁸⁵.
- In Italy, a decree of 2015²⁸⁶ directly attributable to the implementation of the CR harmonises the VNFIL process and by doing so the cost structure of VNFIL provision. Furthermore, the key Decree 13/2013 introducing VNFIL based on the CR has contributed to the creation of a favourable ecosystem for VNFIL²⁸⁷. Despite this national framework, VNFIL provision is regionalised and, in many regions, PES offices and private actors often lack the resources and capacity to develop their VNFIL offer²⁸⁸.

The CR has not influenced the strategic funding frameworks of ES, FR, LU, NL – already in place before 2012 – and RO. The specificities of these countries' respective funding frameworks do not allow for an effective comparison of their efficiency. In France, VNFIL funds are mostly raised from the taxation of private companies but the practical implementation of the VAE framework is left up to the many accredited validation bodies who have control over spending²⁸⁹. In Spain, the State allocates VNFIL funds to the regional autonomous communities but has had to cut back on funding in recent years following the introduction of austerity measures²⁹⁰.

In DK, FI, SE, VNFIL has been for a long time an integral part of education and training, and lifelong learning policy as well as labour market activation policies. This means that the costs of VNFIL are amalgamated within wider educational or employment measures. There is usually no earmarked funding for VNFIL in this context²⁹¹. In both Denmark²⁹² and Sweden²⁹³, it was pointed out that the lack of

²⁸³ Flemish Parliament Decree of 7 March 2018. Effective since 1 September 2019.

²⁸⁴ Based on a KII in BE-fr

²⁸⁵ Based on Expert group meeting discussions (of note is the provision of validation to the employees of the Caterpillar company that recently had to undergo restructuring).

²⁸⁶ Legislative Decree 14 September 2015, no. 150 – Reform of the legislation in the field of employment services and active employment policies in accordance with Law 183/2014

²⁸⁷ Confirmed by KIIs in Italy

²⁸⁸ Based on Expert group meeting discussions

²⁸⁹ EQF French 'one-off' report, 2019, Information gathered from National funding agency

²⁹⁰ 2018 European Inventory – Spain country report

²⁹¹ 2018 European Inventory – DK, FI, SE country reports. Situation overall is unchanged from the baseline as per 2010 Inventory synthesis report. Confirmed by interviews with Finnish government stakeholders and an organisation representing Swedish validation providers

earmarked funding in most study programmes (on all levels: general adult education, IVET, HVET, higher education) makes education and training providers hesitant to engage in VNFIL and does not create any incentives for the offer of validation.

Lastly, a considerable number of Member States (AT, BG, CZ, DE, EL, HU, IE, LT, LV, MT, PL, SK, UK) lack a dedicated or unified funding framework for VNFIL²⁹⁴. In those countries, provision tends to be decentralised, and costs will thus vary depending on the validation measure or the accredited organisation in charge of providing it. In both Ireland²⁹⁵ and the United Kingdom²⁹⁶, it was reported that no funding was made available or used for implementing the CR.

4.2.1.2 Potential for efficiencies through the European Social Fund

ESF can support the cost-effective implementation of VNFIL systems in their developmental stage. From 2012 onwards, there is evidence that ESF has been used for this purpose in ten Member States: BG, CY, CZ, EE, EL, LV, MT, PL, RO, SI, SK.

For Cyprus, Greece and Poland, there are explicit indications that the use of ESF directly relates to the development of systems inspired by the CR, contributing to building considerable capacity for the provision of VNFIL.

- In Cyprus, the ESF co-financed two projects for implementing the CR. One concerns the development of a registry of standards for vocational qualifications (SVQ) and the other relates to the validation and certification learning outcomes based on the SVQ (Action Plan for Validation). The services developed are free of charge for the users. Recent increases in the number of validation certifications suggest that ESF project investments are commensurate with validation activity²⁹⁷.
- In Greece, the ESF also co-finances the development of the national qualification framework and the accompanying validation services, in line with the CR principles despite slow implementation. Public bodies, educational institutions and social partner organisations are reported to have used ESF substantially while privately or self-generated funding has been relatively limited (outside the context of EPPOP)²⁹⁸²⁹⁹.
- In Poland, the ESF has co-financed the Integrated Qualification System (IQS) which links the NQF to validation as per the CR, resulting in capacity-building effects in the public sector compensating for the lack of funding coming from the private sector³⁰⁰. However, it was reported that the implementation of the IQS exceeds the scope of the CR which would complicate any cost-benefit analysis of the latter³⁰¹.

²⁹² ECVET Secretariat (2018). The role of ECVET in validation of non-formal and informal learning. Background paper for the ECVET PLA in Roskilde (DK), May 17-18, 2018.

²⁹³ Based on a KII in SE

²⁹⁴ The 2010 Inventory highlights that only a few country updates reported the existence of an earmarked, or ring-fenced budget for validation, while in many it seems that validation activities have to be covered by fees paid by the learners themselves, or from within learning providers' existing budgets.

²⁹⁵ Based on a KII in IE

²⁹⁶ Based on a KII in the UK

²⁹⁷ Based on a KII in CY

²⁹⁸ 2018 European Inventory – Greece country report

²⁹⁹ EOPPEP: National Organisation for the Certification of Qualifications and Vocational Guidance; acting as the leading VNFIL institution is a private legal entity and self-funded.

³⁰⁰ Based on a KII in PL

³⁰¹ Based on a KII in PL

Despite not being explicitly linked to the implementation of the CR, ESF projects to develop VNFIL systems in the Czech Republic³⁰² and Slovakia³⁰³ have proved sustainable and have continued as national measures once ESF funding ended.

In Bulgaria and Estonia, ESF funding helped to create the conditions for developing VNFIL along the lines of the CR's objectives in certain education and training areas, but experiences show that sustaining the same level of VNFIL activity proved difficult once ESF support had ended.

- In Bulgaria, a validation process in VET was developed through an ESF project implemented in 2013-2015³⁰⁴ by the Ministry of Education in cooperation with the National Agency for VET, other relevant ministries and social partners. However, the offer of validation free of charge for people with VET skills ended when the project ended³⁰⁵. Some VNFIL measures are reported to be envisaged under the ESF 2021-2027 Programme 'Science and Education for Smart Growth'³⁰⁶.
- In Estonia, VNFIL capacity building costs have been ESF project-based in the HE and VET sectors (i.e. the VOTA system through the "Primus" and "Development of occupational qualifications system" projects in 2007-2013³⁰⁷). These projects were initiated before the introduction of the CR. While Estonia has been active in developing VNFIL services as per CR principles – particularly in the education and training area – there has been a funding void for further developing the VNFIL offer since ESF support ended a few years ago³⁰⁸.

ESF thus has capacity building effects in countries where it is used for the early-stage development of VNFIL systems, thus potentially contributing to the cost-effectiveness of delivery in the long run – regardless of whether the systems are based on the CR. However, this may not be so much the case for ESF funding for smaller-scale VNFIL initiatives, e.g. covering a specific area of education and training.

The ESF has also been used in countries with more advanced VNFIL systems to modernise and expand the coverage of services as per the objectives and principles of the CR. This is the case in Portugal for the entire VNFIL system, and in French-speaking Belgium in Higher Education despite some minor issues reported regarding efficient administration of the funding.

- In Portugal, the ESF is extensively used to co-finance VNFIL provision in the context of the *Qualifica* programme introduced in 2017 with a focus on low-qualified adults and building on the RVCC³⁰⁹ system in place since 2000. ESF supports the development of the network of *Qualifica* centres to improve the visibility of RVCC³¹⁰ and to contribute to making it a free of charge service VNFIL for all adults living in Portugal³¹¹. While it was highlighted that ESF funding has built-in efficiency since its provision conditional on the achievement

³⁰² This concerns the NSK, as confirmed by a KII in CZ

³⁰³ 2018 European Inventory – Slovakia country report; Detko J. et al (2016) *Validácia výsledkov neformálneho vzdelávania a informálneho učenia sa v SR* (Validation of non-formal and informal learning in the Slovak Republic), Bratislava, ŠIOV 2016, 79 pages, available at <http://www.erasmusplus.sk/index.php?sw=31>

³⁰⁴ Based on a KII in BG (ESF project: 'New opportunity for my future')

³⁰⁵ Based on a KII in BG.

³⁰⁶ Ibid

³⁰⁷ 2018 European Inventory – Estonia country report

³⁰⁸ Ibid

³⁰⁹ Recognition, Validation and Certification of Competences

³¹⁰ Based on a KII in PT, confirming ANQEP (2018) report findings

³¹¹ ANQEP (2018): Implementation of the 2012 Council Recommendation on Validation of Non-formal and Informal Learning. One-off report: Portugal

of key targets, *Qualifica* centres in rural regions more dependent on ESF have experienced financial constraints due to delays in payment³¹².

- In French-speaking Belgium, three universities have been taking part in an ESF-funded project entitled 'VAE 2020' which applies a four-stage process to validation in HE together with the provision of guidance and counselling to users in line with the CR principles. While 'VAE 2020' has had positive effects on participation, costs associated with ESF management and administrative requirements have been disproportionate compared to the benefits generated (e.g. VAE counsellors spending two-thirds on ESF reporting rules)³¹³.

4.2.1.3 Available evidence on the proportionality of costs and benefits

In several Member States³¹⁴ (EE, ES, IE, IT, FI, NL, RO, SE), it was reported that the benefits of VNFIL in principle exceed its costs at the level of the individual, the economy or society. First-hand information³¹⁵ gathered from Estonia, Finland, the Netherlands and Sweden suggest that VNFIL in the education and training area creates potential savings for both institutions and individual users, effectively reducing unnecessary study or training time. However, no data could be provided to support such assumptions. Moreover, none of these countries' VNFIL systems have been explicitly influenced or shaped by the CR – except for Estonia.

Quantitative-based analyses on the cost-effectiveness of VNFIL have been carried out in Sweden and Slovenia even though again the systems of these two countries have not been directly influenced by the CR:

- In Sweden, a cost-benefit analysis of VNFIL carried out in 2018 by the National Validation Delegation showed that even a limited award of VNFIL credits are profitable for society and the economy³¹⁶. The analysis also reported increased levels of validation activity in the labour market area in the previous 3-4 years following investments since 2004 in sector-based validation by social partners to address skills shortages. which shows that longstanding investment in validation eventually creates benefits at large³¹⁷.
- In Slovenia, an analysis of the benefits of VNFIL to candidates conducted in 2017³¹⁸ found that 44% of them experienced a change in their professional situation after being awarded their NVQ certificate: most of them were given additional responsibilities at work, 13% among them found a job in their selected field of specialisation, while 8% gained a promotion or permanent employment³¹⁹. While the benefits of VNFIL to individuals and employers are being increasingly recognised, it remains difficult to measure them robustly; data on people finding a job after validation is surely a good indicator cost-

³¹² Confirmed by both a representative of a representative of the PT agency for adult education and a representative of a local *Qualifica* centre

³¹³ Based on a KII in BE-fr

³¹⁴ Based on KIIs in EE, ES, IE, IT, FI, NL, RO and SE

³¹⁵ Based on KIIs in EE, FI, NL, and SE

³¹⁶ Valideringsdelegationen (2018): Validering i högskolan – för tillgodoräkning och livslångt lärande. SOU 2018:29. http://www.valideringsdelegation.se/wp-content/uploads/2018/04/sou-2018_29-validering-i-hogskolan-fr-tillgodorknande-och-livslngt-lrande-webbversion.pdf

³¹⁷ Ibid;

³¹⁸ Kunčič-Krapež B. et al. (2017) Accompanying the NVQ certification system: candidates in the verification process and validation of national vocational qualifications (*Spremljava certifikatnega sistema NPK: Kandidati v postopku preverjanja in potrjevanja nacionalnih poklicnih kvalifikacij*), Institute of Republic of Slovenia for VET http://www.cpi.si/files/cpi/userfiles/Publikacije/NPK_spremljava_kandidati.pdf

³¹⁹ Ibid;

effectiveness but such quantitative information may not be enough to properly measure efficiency³²⁰.

While not relatable to the implementation of the CR, evidence from three Member States (BG, PL, SI) suggests that imbalances in the distribution of VNFIL costs among different stakeholders (public, private) can be due to the fact that individuals and companies may not be sufficiently sensitive to the benefits of validation, creating potential supply-demand inefficiencies.

- In Bulgaria, validation is not very popular among private sector stakeholders. Even those who are aware of it are rather sceptical about using it. This can be explained by the fact that validation procedures are lengthy, and the costs usually have to be fully covered either by the employer or the person undergoing the procedure (except under ESF projects). In some sectors like tourism and security, employers may have a higher interest in investing in validation due to specific occupational requirements³²¹.
- In Slovenia, despite some positive findings on the benefits of validation to users, it was reported that costs are inequitably distributed with disproportionate funding from the State and the EU due to insufficient buy-in from private employers and users³²².
- In Poland, there is a mixed picture as to whether the costs associated with VNFIL are fairly spread as well as commensurate to the benefits generated. VNFIL is not yet the norm on the labour market, and private actors only have limited resources to engage in it. On the other hand, a lot of public resources have gone into the development of IQS and the taking up of CR principles³²³.

In summary, the diversity of funding models across the Member States reflect the diversity of their VNFIL systems, with some having been directly influenced by the CR. This limits the possibility of conducting an advanced analysis of the costs and benefits associated with the CR's implementation. It should be noted that the CR itself does not advise on the cost-effectiveness of funding mechanisms.

There is however evidence that the CR's principle of multi-stakeholder collaboration can be cost-effective when translated into a funding model (e.g. Belgium). Such a model guarantees balanced financial contributions from all involved parties according to commonly agreed upon objectives for VNFIL provision. On the other hand, no dedicated funding mechanisms or budget lines for VNFIL can hinder its provision as competing priorities – for instance in education and training policy – will create uncertainties around the availability of funds for VNFIL.

Importantly, the ESF as a funding mechanism has been shown to improve capacity and resourcing for the early-stage development of national VNFIL systems creating long-term efficiencies.

Available evidence from key informants shows overall agreement that the benefits of VNFIL in theory exceed the costs of its implementation based on the principles of the CR³²⁴. This is also reflected in the results of the public consultation³²⁵ in which 53% of the responding organisations (or 86 out of 162) believed that costs of implementing the CR are proportionate to the benefits it generates for individuals, the economy and society (26% or 42 respondents to a high extent, and a further 27% or 44

³²⁰ Based on KIIs in SI

³²¹ 2018 European Inventory – Bulgaria country report'

³²² Based on a KII in SI.

³²³ Based on a KII in PL

³²⁴ This point was also made during interviews with EU umbrella organisations

³²⁵ OPC Q9

respondents to some extent). The results of the public consultation however also reflect the limited evidence on the costs and benefits generated by the CR as 36% (or 59) of the responding organisations did not know whether the costs of implementing the CR are proportionate to the benefits it generates.

The findings presented in this section suggest that coordinated monitoring action at EU level would be useful to cost all validation processes against their outcomes across the Member States: in terms of employment, career progression, participation in further learning, and even in terms of social inclusion³²⁶.

4.2.2 Factors influencing efficiency³²⁷

Very few factors influencing the efficiency of the CR's implementation could be identified.

Nevertheless, following on from the findings in the previous subsection, a key factor influencing the efficiency with which the foreseen impacts of the CR can be achieved is the extent of **multi-stakeholder collaboration**.

Multi-stakeholder collaboration contributes to creating a common vision, which can ensure the appropriate distribution of costs among the participating stakeholders.

This is clearly visible in French-speaking Belgium (Brussels-Wallonia) where a legal agreement renewed in 2019 based on the principles of the CR has ensured a consensus among public institutions, social partners and the business community (forming a consortium) as to how the offer of VNFIL services should be organised and modernised – the modernisation of the offer may not have happened so efficiently without the CR³²⁸.

While the CR has not directly influenced the VNFIL systems of Finland and Sweden, it has been reported that it has helped to foster a dialogue among public and private stakeholders. This has partly contributed to the streamlining and rationalisation of resources for VNFIL in Finland³²⁹, while in Sweden this has fed into a reflection on ways to improve the sustainability of funding for VNFIL³³⁰.

Conversely, Member States where a lack of practical or concrete collaboration between public and private stakeholders on VNFIL has been reported (e.g. Poland³³¹, Slovakia)³³² tend to be characterised by imbalances in the distribution of VNFIL-related costs (see subsection 4.2.1) and inefficiencies in provision due insufficient financial contributions from the private sector.

Involving multiple stakeholders – as prescribed in the CR – is indeed important to foster a common vision on VNFIL; from a public policy perspective, this implies incentivising private sector stakeholders to invest in VNFIL and promote its use. However, there has been some discussion as to whether certain principles of the CR may act as disabling factor in this regard³³³.

More specifically, it has been argued that the CR's **targeting of disadvantaged groups** – often at a distance from the labour market – may not be conducive to investments among labour market stakeholders, thus constraining the offer of VNFIL

³²⁶ Confirmed based on an interview with an EU umbrella organisation

³²⁷ Relates to Sub-question 4.2 of the Terms of Reference

³²⁸ Based on a KII in BE-fr.

³²⁹ Based on a KII in FI

³³⁰ Based on a KII in SE

³³¹ Multi-stakeholder collaboration is in theory covered under the Integrated Qualification System (IQS) law

³³² Based on a KII in SK. Confirmed during Expert group meeting discussions.

³³³ This point was discussed at the Expert group meeting.

services. Employers will indeed tend to see validation as a means to address staff or skills shortages³³⁴.

Although not related to the implementation of the CR, experiences in Sweden have shown that VNFIL targeted at specific target groups with usually low employability (e.g. the low-skilled and newly arrived migrants) have proved ineffective in terms of facilitating users' entry into the labour market³³⁵. Furthermore, VNFIL measures targeting specific groups have also proved inefficient not only due to their ad-hoc and short-term nature on the one hand, but also because they have been administered by different governmental authorities depending on the specific purpose and groups targeted groups³³⁶. It is argued that this has hindered sector organisations' access to public funds who have argued for better long-term conditions for further developing effective validation arrangements³³⁷.

Effective targeting³³⁸ – based on a person's readiness for validation – can therefore be a factor of efficiency in the delivery of VNFIL to address employers' demands and expectations, and thus to secure their financial support.

Tellingly, results from the public consultation³³⁹ show that only one out of the 63 respondents who had recently undertaken validation (or 2%) indicated having received financial support for participation to re-integrate into work. A further 11% (or 7) of the respondents indicated having received financial incentives for participation for other reasons. Conversely, 60% of previous VNFIL users (or 38 respondents) received no financial support for participation.

As far as **exogenous factors** are concerned, economic recessions and unemployment have been identified as a factor influencing the cost-effectiveness of VNFIL delivery in Greece³⁴⁰, Slovakia³⁴¹ and Slovenia³⁴² as they result in an increased demand for validation, especially as upskilling tends to be an even greater necessity across many sectors during periods of recession.

In summary, models of multi-stakeholder collaboration – as inspired by the CR – can constitute a factor improving the efficiency of VNFIL systems as it ensures a common vision which effectively mobilises an appropriate and balanced level of funding from all involved parties.

Appropriate targeting is also a factor to consider for improving the efficiency of VNFIL measures, especially when connected to skills demands and labour market dynamics.

More generally, demand-driven funding can be considered a factor of cost-effectiveness as it improves the availability of VNFIL – a key objective of the CR. Paradoxically, economic recessions can increase the need for re-skilling or upskilling, and therefore validation, not only among employers but also workers, where the latter are willing to invest in VNFIL and make the most of such opportunities to improve their career prospects.

³³⁴ Based on Expert group meeting discussions

³³⁵ Based on Expert group meeting discussions

³³⁶ Confirmed by KIIs in SE

³³⁷ Based on a KII in SE

³³⁸ This point was discussed during the Expert group meeting and also raised in an interview with an EU umbrella organisation.

³³⁹ OPC Q17

³⁴⁰ Based on a KII in EL

³⁴¹ Based on a KII in SK

³⁴² Based on a KII in SI

4.3 Relevance

In terms of the relevance, the research seeks to establish whether the CR:

- Is still relevant to the current policy context and socio-economic needs of the Member States.
- Is responsive to the needs of the different types of stakeholders it involves, and most importantly, to individuals benefitting from validation practices – from an organisational, labour market and social inclusion perspective.
- Includes processes and principles that are fit for purpose.

4.3.1 *Relevance of CR to the policy context and current socio-economic needs*³⁴³

Relevance focuses on the extent to which the objectives of the CR remains relevant to national policy context and socio-economic needs.

Overall, there is a high degree of consensus across the Member States that **the CR continues to address current socio-economic needs and priorities**, influencing the development of wider policies and validation initiatives linked to up-skilling, youth unemployment, and social inclusion. There is also consensus that the CR has raised the profile of VNFIL in the public domain and serves as a framework to organise and negotiate structural support for VNFIL in a national policy context.

The **objectives and principles of the CR** have been identified as **a catalyst to address the ever-changing demand for skills in an increasingly competitive world of work**. Although the broad and open nature of the CR is considered generic, the 2015 European Guidelines for VNFIL have been identified as a useful tool – offering detailed guidance to support the implementation of the CR in practice. Whilst there is widespread agreement that the CR remains relevant in the current socio-economic context.

For many countries, the relevance of the CR is firmly rooted within an economic context, linked to the economic crisis that began in 2007-2008 across Europe. For example, in Spain, an interviewee reported that since the economic crisis, the objectives of the CR continue to be highly relevant for the Spanish economic context. It was reported that 49.3%³⁴⁴ of the economically active population have professional competences acquired through non-formal and informal learning, which are currently not recognised. In this respect, continued relevance of the CR is considered highly important. In Latvia, policies related to VNFIL were formed the economic downturn with the objective of providing opportunities for individuals to gain recognition of their skills and competences³⁴⁵ and gain access the labour market. Measures related to employability continue to have a heavy emphasis on VNFIL as part of up-skilling initiatives³⁴⁶.

The **relevance of the objectives of the CR addressing current economic needs** in terms of enhancing the competitiveness of the workforce and opportunities for up-skilling and lifelong learning continues. There is evidence the CR has promoted the development of policies and initiatives for VNFIL across several Member States.

- In Austria, the recently published validation strategy³⁴⁷ is based on the 2012 CR³⁴⁸ and is situated both within a European and national context, outlining

³⁴³ Relates to Sub-question 5.1 of the Terms of Reference, Invitation 1

³⁴⁴ Figure provided by the interviewee from the Spanish Ministry of education

³⁴⁵ 2018 European Inventory – Latvia country report

³⁴⁶ 2018 European Inventory – Latvia country report

³⁴⁷ BMB & BMWFW (2017)

³⁴⁸ Though reportedly initially triggered by the ET2020, the Copenhagen process, and the Bologna process

current social and economic challenges for society. The relevance of CR provides a policy focus on the need for recognition of knowledge, skill and competence within a lifelong learning context³⁴⁹. Despite this, VNFIL is currently not considered a policy priority in Austria³⁵⁰.

- In Bulgaria, the relevance of VNFIL in the context of lifelong learning is set out as a one of the main priorities of the National Strategy for Lifelong Learning (2014-2020). In addition, the VET Development Strategy (2015-2020) defines the development of a system of validation as a priority in the context of lifelong learning³⁵¹.
- In Ireland³⁵², the significance and potential of VNFIL³⁵³ has been referenced in many national policies and reports since the implementation of the CR in 2012. Much of the focus in a national policy context is on the role of VNFIL enhancing peoples' prospects for employment and supporting economic growth.
- In Lithuania, the long-term education strategy 2013-2022 foresees the creation and implementation of a system for VNFIL. In addition, the Employment Enhancement Programme 2014-2020 (Lithuanian Government, 2013) and the national progress programme for the period of 2014-2020 provides for the development of a system for competences (acquired in different ways including non-formal and informal learning) assessment and recognition. The non-formal adult education and continuing training development programme for 2016-2023 also aims to create and implement a system for validation of competences acquired through all forms of learning³⁵⁴. In the case of Lithuania, it is not possible to determine the extent to which the CR alone influenced the development of strategies outlined above (and in other countries for that matter).
- In Hungary, the CR continues to be relevant in terms of raising the profile of VNFIL as a tool to help employers address skills shortages which are reported as an issue in the country despite the fact opportunities for VNFIL remain limited in the country³⁵⁵.

In some Member States the **relevance of the CR to the labour market** is emphasised specifically in relation to the **modernisation and digitalisation of work**. Examples drawn from several Member States highlight the importance of validation for economic efficiency and the transition between jobs.

- In the Netherlands, the relevance of the CR is recognised in the context of an increasingly dynamic and changing labour market that requires all forms of learning to be recognised³⁵⁶.
- In the Czech Republic, it is reported that the objectives of the CR remain highly relevant in the current economic context. The role of VNFIL is considered increasingly important given the upcoming changes in the labour market and growing demand for skilled labour in a range of occupational areas including, information technology, health care, and legal professions. Similar views were expressed in Slovakia where an interviewee highlighted the important

³⁴⁹ Pfeffer, Thomas & Skrivanek, Isabella (2018)

³⁵⁰ Confirmed by KIIs in AT

³⁵¹ 2018 European Inventory – country report for Bulgaria

³⁵² 2018 European Inventory country report for Ireland

³⁵³ Usually designated as RPL (Recognition of Prior Learning) in Ireland

³⁵⁴ 2018 European Inventory – county report for Lithuania

³⁵⁵ Based on a KII in HU

³⁵⁶ Based on a KII in NL

contribution VNFIL can make in response to rapid changes in the labour market and associated increases in the demands for re-skilling³⁵⁷.

- In Sweden, the CR is deemed highly relevant for the future given continued changes in the competences required in working life, partly as a result of the digitalisation of work: VNFIL is seen as an essential component to enable lifelong learning with the aim to normalise the acquisition of skills certifications outside of formal education. The CR remains relevant as it recognises and facilitates the need for skills and competencies developed through prior education or work experience or in some other way to be “cashed” and provide the possibility of a frictionless additional qualification that can lead on to a new job or occupational area³⁵⁸.
- In Germany, the National Skills Strategy published in 2019 recognises the potential of validation (informed by the *ValiKom* project) to respond to the digital transformation of the labour market. Consideration is given to anchoring the *ValiKom* pilot approach within a legal/regulatory framework to allow for skills and competences acquired outside the formal education system to be recognised across a range of occupational areas.
- In Finland, it is recognised that validation of prior learning has great significance to the Nordic economy – particularly in terms of the flexibility of workforce, access to further training and improving second chances for individuals³⁵⁹. Moreover, making an individual’s competences visible through the VNFIL provides individuals with the opportunity to remain mobile in the job market³⁶⁰.
- In Malta, the relevance of the CR is emphasised in relation to boosting certain occupational sectors. Although implementation of the CR continues to take time, the objectives of the CR remain relevant in addressing the socio-economic needs of the country through boosting employment opportunities. Specific reference was made to the contribution of validation in addressing skills shortages in certain occupational areas. For example, the validation process in the hospitality industry leads to the award of a skill proficiency card attached to occupational standards set by sectoral skills committees. A similar approach is applied in the construction sector. Additionally, the relevance of the CR is reinforced by the fact the sectoral skills committees composed of stakeholders within a particular sector, facilitates endorsement of the validation process and assures the relevance of the validation processes for the different sectors³⁶¹.

The CR objectives are also perceived to be relevant to the current social context with validation being increasingly used to support the socio-economic integration for newly arrived migrants and addressing the situation of low-skilled adults and long-term unemployed³⁶². Evidence of how the CR has promoted the development of opportunities for VNFIL from an inclusive perspective is discussed in the following section.

³⁵⁷ Based on a KII in CZ

³⁵⁸ Based on KIIs in SE

³⁵⁹ Nordic Network for Adult Learning (2019)

³⁶⁰ Karttunen, Anni (2015). How informal and non-formal learning is recognised in Europe. https://www.bertelsmann-stiftung.de/fileadmin/files/BSt/Publikationen/GrauePublikationen/LL_Finland_FINAL_Web.pdf

³⁶¹ Based on KIIs in MT

³⁶² Based on KIIs in multiple MS and confirmed by the findings presented in subsection 4.1.1.6 in this report.

4.3.2 Relevance of the CR to stakeholders and target groups

4.3.2.1 Responsiveness to the needs of disadvantaged groups

As noted in section 4.3.1 above, the CR continues to have relevance to the current social context of several Member States given its focus on promoting opportunities for VNFIL to disadvantaged groups. In particular, the relevance of the CR from an inclusive perspective was emphasised as a way to support the socio-economic integration for newly arrived migrants and addressing the situation of low-skilled adults and long-term unemployed. Specific reference to the relevance of the CR in this respect was reported in the case of AT, CY, DE, EL, FI, HU, NL, RO, SE, SI.

There is a shared view that VNFIL can have significant social, civic and economic returns which would help break the cycle of educational inequity and exclusion. The public consultation results³⁶³ also provide evidence in relation to the relevance of the CR from a social inclusion perspective. The findings show that 77% of the respondents (200 out of 262) thought validation – and EU-level recommendations on validation – to be relevant in all areas and that in all cases, people who have acquired skills either in the workplace or outside of school should be able to have them validated. Only 21% (or 55) of the respondents thought validation was only relevant in particular cases. Looking at responses by type of organisation, representatives of academic/research institution, NGOs and trade unions³⁶⁴ attached the highest level of relevance to the availability of validation opportunities for all. Looking at results by country, one can observe notable positive results from Belgium, Portugal, Slovenia, Spain, Sweden³⁶⁵ where the vast majority of respondents were of the opinion that validation possibilities should be available in all cases.

While there is evidence from many Member States concerning the relevance of the CR principle on disadvantaged groups and extent to which validation can support the socio-economic inclusion of different users, there is a counter view that the CR lacks emphasis and guidance on how VNFIL could be used to support the needs of specific disadvantaged groups, including: individuals with learning difficulties/disabilities, early school leavers, migrants and refugees. It is argued that the relevance of the CR in terms of outreach to disadvantaged groups appears limited insofar it does not emphasise enough the role of different stakeholders in this regard nor does it underline the importance of innovative tools and methods to effectively meet the needs of different disadvantaged groups before, during and after validation. Interestingly, the Upskilling Pathways Recommendation of 2016 places greater emphasis on outreach.

Some concerns have been highlighted about the interpretation of the CR principle on disadvantaged groups, particularly among labour market stakeholders³⁶⁶:

- References to VNFIL for individuals who are unemployed or at risk of unemployment creates a perception that users of validation are mainly low-qualified, low-skilled and as having low employability potential. Linked to the validation process, there is a perception this group of users will require significant investment in the identification and documentation stages of validation.
- Employers may not recognise the benefits of promoting the use of validation for people with low skills and low employability as they would often fail to see any returns on their investment.

³⁶³ OPC Q2

³⁶⁴ Academic/research institutions: 27 out of 31 respondents; NGOs: 33 out of 38; Trade unions: 6 out of 7

³⁶⁵ BE: 11 out of 12 respondents; PT: 19 out of 23; SI: 10 out of 12; ES: 12 out of 14; SE: 9 out of 11.

³⁶⁶ Based on Expert group meeting discussions

- VNFIL targeting the low skilled can also potentially contribute to a negative perception of validation outcomes among the wider business community.

Within the higher education sector, despite validation being increasingly considered as an efficient and sustainable way to attract mature students and adult learners in the context of an ageing population, it was argued that the CR does not cover access to lifelong learning or lifelong learning needs and there is no provision for dealing with obstacles to validation and how these could be removed (e.g. allocation of study, compensation to the employer, work-life balance)³⁶⁷.

Considering the broad scope of the CR, a recurrent and summative view is that the CR is not enough on its own to support the social and economic integration of certain disadvantaged groups and their specific needs, who may require broader interventions across a range of different policy fields³⁶⁸. This also relates to the view that there is limited evidence about how validation processes for different target groups work in practice.

4.3.2.2 Responsiveness to the needs of different stakeholders³⁶⁹

The complex nature of validation is reflected in the breadth of the principles outlined in the CR that is considered to set an expectation for a multi-stakeholder approach to build trust and ensure that the outcomes of VNFIL meets the needs of different target groups (especially disadvantaged groups) and that they are accepted in society and the labour market.

Overall, there is a relatively high degree of consensus that the CR is relevant in terms of its responsiveness to different stakeholders at the national level, ensuring their views are taken into consideration. As identified in the Expert group discussions, the relevance of stakeholder involvement and collaboration between policy stakeholders, formal education and training institutions, the labour market actors and civil society seems to be more pronounced today than it was in 2012.

The extent to which the CR is responsive to the needs of stakeholders was also included in the OPC³⁷⁰. Results from the public consultation reveal that 67% of respondents on behalf of an organisation (or 106 out of 159) agreed that the CR has appropriately addressed the needs of their respective organisation (32% or 50 respondents to a high extent and 35% or 56 respondents to some extent). In addition, 72% of the responding organisations (or 117 out of 162 respondents) believed interested parties should be involved in the development of validation policies and initiatives: either to a high extent (32%; 52 respondents) or to some extent (40%; 65 respondents)³⁷¹.

Despite a high degree of consensus on the relevance of multi-stakeholder collaboration for the development of VNFIL arrangements, it has been argued that the CR provisions on multi-stakeholder partnerships does not go far enough as to describe how in practice these partnerships could take place despite specifying who they should involve, and that the CR did not contain anything new regarding stakeholder collaboration for practitioners/countries already involved in VNFIL³⁷². A consideration in this respect, is not about which stakeholders are included, excluded or absent, but rather the depth of implementation from key stakeholders, together with a clear understanding of the purposes of validation and expectations of each of the stakeholders involved.

³⁶⁷ Based on KIIs in BE-fr, MT. Confirmed during Expert group meeting discussions.

³⁶⁸ Based on KIIs in AT, BE-fr, CY, IT and SI. Confirmed during the Expert group meeting discussions

³⁶⁹ Refers to Invitations 4 and 5 in the Terms of Reference

³⁷⁰ OPC Q10

³⁷¹ OPC Q11

³⁷² Based on Expert group meeting discussions; also based on a KII in AT

Given it is not the intention or purpose of the CR to prescribe how multi-stakeholder partnerships should work in practice, the 2015 European Guidelines for VNFIL provide information on the range of stakeholders involved, their respective functions in VNFIL and, the conditions to improve the coordination of validation arrangements among stakeholders. Moreover, it is argued that the CR alone cannot resolve such issues and whilst the CR promotes opportunities for stakeholder involvement and collaboration, the CR cannot be responsible for the outcome. There is the recognition that the CR is only the beginning of a longer-term approach to validation and that the system within which validation is parsed is more complex and requires substantial investment for VNFIL to be equally relevant to all stakeholder types³⁷³.

Whilst mainly supportive of the relevance of the CR, representatives from certain stakeholder types provided insights into the responsiveness of the CR from their specific perspective. Overall there is a view that collaboration between stakeholders representing education and training, civil society and the labour market should be strengthened within the context of a lifelong learning approach. Information about existing opportunities for validation should be consolidated to facilitate greater collaboration between stakeholders.

In terms of **labour market stakeholders**, the relevance of the CR in promoting opportunities for up-skilling and re-skilling remain relevant with support for a continued focus in this area. It has been suggested the CR might benefit from being more consolidated by focusing on where validation is really needed and where it can generate the highest returns on investment³⁷⁴, and that channels guaranteeing involvement of labour market stakeholders could be more strongly emphasised in the CR³⁷⁵.

Within the **education and training area**, relevance is best served by guaranteeing that stakeholders across all the different sub-sectors of education and training are involved in VNFIL to meet a wider range of target groups³⁷⁶.

While the CR is regarded as flexible and adaptable enough to cover the needs of the different sectors involved in VNFIL, efforts are needed to enhance the involvement of **civil society stakeholders** more broadly in VNFIL arrangements at national level. Conversely, as civil society stakeholders continue to face challenges in efforts to comply with regulatory and quality assurance requirements, opportunities to engage in validation processes are increasingly becoming limited³⁷⁷.

Some mixed reactions were received regarding the responsiveness of the CR to different stakeholder types, denoting in certain cases the **lack of a common vision amongst stakeholders about the purpose of validation**.

- Tensions between employers or industry stakeholders and formal education institutions around the definition of skills and qualifications standards can arise and therefore act as a barrier to multi-stakeholder collaboration, emphasising the need for validation to be better adjusted to skills needs on the labour market³⁷⁸.
- In the Czech Republic, it was argued that the measures and principles outlined in the CR are more relevant to policymakers given its high-level tone than to stakeholders involved in the actual implementation of validation.

In addition, there is a view that not all stakeholder types are involved in validation arrangements given that some countries tend to prioritise validation in relation to

³⁷³ Based on KIIs in IE and SE; point also raised during the Expert group meeting discussions

³⁷⁴ Based on Expert group meeting discussions

³⁷⁵ Based on a KII in FI

³⁷⁶ Based on KIIs in BE and SI

³⁷⁷ Based interviews with EU umbrella organisations

³⁷⁸ Based on Expert group meeting discussions

certain areas, subjects, sectors or occupations, and not others. This limits collaboration between stakeholder types and restricts opportunities for validation across the broad areas of education and training, labour market and third sector and does little to reinforce stakeholder trust in validation.

On a general note, it appears that there is still a need to move toward greater collaboration between stakeholders whereby deeper insights into how cooperation and collaboration between different stakeholder types involved in validation processes currently work in practice is required. The CR nevertheless does constitute a first step in this direction.

4.3.3 Relevance of the measures and principles of the CR³⁷⁹

4.3.3.1 Relevance of the validation process set out in the CR³⁸⁰

Overall there is agreement that the four-stage approach to VNFIL outlined in the CR provides a framework to structure the design and implementation of a validation process, making the process more flexible and adaptable to individual needs.

Conversely, the extent to which all four steps are considered relevant and used in practice, depends on the context in which VNFIL is undertaken, the stakeholders involved and respective purpose of the initiative. As expressed in the CR, an individual can take advantage of any of the stages of validation, either separately or in combination, in accordance with his/her needs. It is well documented that for some individuals in certain circumstances, the identification and documentation are the most relevant stages of a validation process, whereby for some individuals it remains difficult to move on to the assessment and certification stages of validation or may not be the purpose of the validation initiative. This type of validation for formative purposes has an important role to play in leading people to further learning, exemptions for purpose of access, learning plans, etc. In other contexts, summative validation including assessment and certification are the most relevant stages of VNFIL for some individuals.

There is some debate about the relevance of a four-stage validation process and extent to which some, but not all four stages are covered in a given validation process. During the Expert group meeting, the issue of 'what and how many stages of validation constitute a validation process' was discussed.

In some countries (CZ, EL, SK) certain stages of VNFIL have been reported not considered relevant and not used as part of a validation process for reasons specific to national priorities, the sectors covered by the providers delivering VNFIL services, and other contextual factors (such as responsiveness to stakeholder needs).

- In the Czech Republic for example, the identification and documentation stages are not required to apply for assessment and certification. As previously noted, this follows the logic that validation is not targeted at low-skilled adults.
- In Slovakia, VNFIL focus predominantly on the last two stages of the validation process. At present this is partly explained by the lack of a conceptual framework for VNFIL and absence of legislative backing for the implementation of validation based on robust quality assured processes.

Views were expressed about the relevance of validation tools and methods and extent to which they are relevant to needs of different user groups during the individual

³⁷⁹ Relates to Sub-questions 5.2 and 5.3 of the Terms of Reference (5.3 on 'relevance of governance and support' has been amalgamated into 5.2 'relevance of measures', also to avoid repetition with 5.3 to avoid repetition with TOR sub-question 2.2 on the effectiveness of support actions)

³⁸⁰ Refers to Invitations 2 (stages of validation) and 3 (principles) in the Terms of Reference

stages of validation. Ensuring variation in assessment methods and adapting tools to ensure they are of relevance to different target groups and disadvantaged learners was highlighted – particularly in relation to individuals who may have had a negative experience of assessments³⁸¹ in the past. More generally, further insights into how to make use of the different stages of validation for specific purposes is required.

4.3.3.2 Relevance of CR principles

This subsection presents evidence specifically related to the relevance of the following CR principles; linking VNFIL to NQFs in line with the EQF; and using EU transparency tools to facilitate the documentation of learning outcomes

The data and information gathered for this study did not allow for every single CR principle to be covered from the perspective of relevance. Overall, there is agreement that the principles of the CR serve as an overall framework for VNFIL, collectively promoting the coordination of different aspects of VNFIL.

Linking VNFIL to NQFs in line with the EQF

Most stakeholders interviewed for this evaluation study emphasised the relevance of efforts to establish links between validation and formal education. This can be related to the work undertaken by most Member States in recent years to link or integrate VNFIL into NQFs and align qualifications in their qualification frameworks to the EQF.

Reasons in support of this view include³⁸²:

- The continued importance of non-formal and informal learning for the acquisition of new skills over one's lifetime that can be converted into qualifications to meet continuous changes and new demands in the labour market.
- The acquisition of educational qualifications by means of VNFIL for individuals to have another chance to participate in formal education, helping to bridge educational inequalities and offering further pathways for the development of skills and competences needed in life and in the labour market.
- The transferability of non-formal or informal learning validated in different countries through the alignment of NQFs to the EQF creates opportunities for geographical mobility for work or further learning.

Less positively, it has been argued that differences of opinion on qualification standards – often between formal education institutions, social partners and other labour market actors – suggest that formalised frameworks such as NQFs are not always up to speed with new occupational standards on the labour market given the rapidity of technological progress. In sectors such as ICT, employer standards are considered higher than formal standards, thus questioning the relevance of linking validation to NQFs and ensuring equivalence between validation outcomes and formal qualifications³⁸³.

Transparency tools

While Europass and Youthpass can be useful portfolio-type instruments, the extent to which they are relevant for validation purposes is questionable insofar the tools are used in the context of documenting learning outcomes more generally rather than specifically as part of VNFIL processes³⁸⁴.

Although this report provides examples of some Member States using European transparency tools specifically in VNFIL processes (see subsection 4.1.1.12), there are

³⁸¹ Based on an interview with an EU-umbrella organisation

³⁸² Based on KIIs in CY and CZ and Expert group meeting discussions

³⁸³ Based on Expert group meeting discussions

³⁸⁴ Based on Expert group meeting discussions

no insights into the advantages and disadvantages of requiring the use of transparency tools in validation processes. Moreover, there is a general view that the Europass tool (in particular) should to be updated to be of greater relevance in the context of validation and in doing so, the relationship between EU transparency tools and validation could be further enhanced, building on existing experiences relating the two.

EU Transparency tools were designed to achieve a high degree of (intra-European) internationalisation of studying and learning experiences. However, efforts in this regard so far appear to have been predominantly focused on Higher Education, which may explain why their relevance to VNFIL seems currently quite limited.

4.3.4 Relevance of governance and support³⁸⁵

This section focuses on the extent to which governance and support measures are considered relevant to support the achievement of the CR objectives. It should be read in parallel with section 4.1.2 on 'Support and follow-up actions' under the Effectiveness criterion.

Based on available data and information, overall EU level governance and support to help guide Member States' actions on validation in line with the CR are considered relevant and have contributed to the achievement of the objectives of the CR. However, there is some concern that that the CR has not sufficiently translated into enough specific support and follow-up actions involving stakeholders from various fields and backgrounds at the EU and national levels compared to other EU initiatives in related areas where full OMC processes are in place.

It has been argued that the relevance of governance and support at EU level could be improved by involving a wider diversity of stakeholders. This could be precisely achieved by organising validation events touching on a variety of subjects (e.g. on the role of employers and other labour market stakeholders in VNFIL; on collaboration between civil society organisations and formal educational institutions; on VNFIL for people with learning difficulties etc.)³⁸⁶.

There is enough evidence to suggest that the 2015 European Guidelines for VNFIL have proven to provide considerable support to policymakers and VNFIL practitioners across the EU. However, an update of the Guidelines may soon be needed to ensure continuous relevance of support, reflecting any contextual evolutions and any changes that may be brought to the CR³⁸⁷.

4.4 Coherence

The research seeks to establish the extent to which the CR is³⁸⁸:

- Internally coherent – with provisions and measures complementing one another – from the perspective of the Member States
- Coherent with national measures on VNFIL or with relevance to VNFIL
- Coherent with other EU policy initiatives and conducive to synergies with relevant EU instruments (e.g. ECVET, EQAVET)

³⁸⁵ Relates to Sub-questions 5.3 of the Terms of Reference and should be read alongside TOR sub-question 2.2 on the effectiveness of support actions)

³⁸⁶ Based on KIIs in FI and IE and raised during Expert group meeting discussions.

³⁸⁷ Based on KIIs in FI and IE. Also see section 4.2.3 in this report.

³⁸⁸ Relates to Evaluation Question 6 in the Terms of Reference

4.4.1 Internal coherence of the CR³⁸⁹

Information was collected from 15 Member States³⁹⁰ regarding the internal coherence of the measures of the CR: AT, BG, CY, EL, ES, FI, HR, IE, IT, NL, PL, PT, SE, SI, SK.

In all 15 Member States, it was stated that the measures in the CR – from a national perspective – are **largely internally coherent and complementary to each other**.

Despite this general assessment, limitations have also been mentioned in a handful of Member States (AT, IE, HR, SE):

- An Austrian stakeholder argued that while the CR measures are internally coherent in general and there was very little resistance to them content-wise, some may be defined in too broad terms to be clearly and consistently interpreted – also in relation to others.
- An Irish stakeholder pointed out that while the measures relating to the CR are internally coherent and complementary from the European perspective, this does not contribute to motivating Member States for action.
- From the Croatian perspective it was pointed out that the measures in the CR are regarded as coherent in theory, but there is no evidence to support this in practice.
- A Swedish stakeholder suggested that the CR could be present more coherently how VNFIL serves the needs of specific target groups.

4.4.2 Coherence of the CR with national policies on VNFIL

For the **majority of Member States** (20 out of 25 Member States for which relevant information could be collected: AT, BE, BG, CY, DE, DK³⁹¹, EE, ES, FI, FR, HR, IT, NL, PL, PT, RO, SE, SI, SK)³⁹² there is evidence that the **measures in the CR are largely consistent with the national measures related or relevant to VNFIL**. However, it should be noted that in some of these countries VNFIL is not a central issue in current policies, such as in Austria or Germany.

It has been reported in some Member States that **the CR has initiated or reinforced certain national VNFIL measures** or helped towards the reform of educational systems (e.g. in BG), and that the principles of the CR have for the most part a high degree of coherence with the organisation of the education and training sectors (e.g. in BE-nl). In some countries, new legislation was brought in based on the CR (e.g. in IT) or from existing laws that were amended or updated based on the CR (e.g. in BE, CY, SK). The adoption of NQFs in various EU countries since 2012 is also coherent with the CR. These processes reflect the willingness and efforts of many countries to adapt their policies to the aims and principles of the CR.

For several countries, **evidence of coherence has been linked to strategies, legislation or other national activities related to lifelong learning** (e.g. in AT, EE, HR, SK, RO). In some of these countries where validation arrangements were almost inexistent before 2012, the CR has even contributed to shaping LLL strategies. The interviews with key informants also highlighted other aspects that point to the coherence between national policies and the CR. Reference was made to policies in in

³⁸⁹ Relates to Question 6 in the Terms of Reference

³⁹⁰ Information from the remaining 13 MS was not collected for multiple reasons. See Section 2.2.1 for more information.

³⁹¹ In Denmark, national measures suggest coherence with the CR, although explicit references to the CR are rare. More frequently, references point to the Nordic Network for Adult Learning, which Denmark is part of.

³⁹² No statement was made on this subject by the interviewees from three Member States (LU, LV, UK).

higher education (FI³⁹³), to the National Skills Strategy (DE³⁹⁴), to employment-related policies (BG, IT), or to policies related to volunteering (RO³⁹⁵).

Although a high degree of coherence between CR actions and national VNFIL or VNFIL relevant actions was observed, there was also a **need for improvement** identified in some of these countries.

- In Italy, the overall objective of the CR is fully integrated in the public debate, and in the legislative and regulatory framework of VNFIL within the country (i.e. the system established by Decree 13/2013). Nevertheless, there is still a need for more targeted actions towards some groups facing emerging challenges due to a changed political context which has led to new policy priorities: recognition of migrants' competences, smoother transitions from school to work and from work to work.
- In the Netherlands, validation (the labour market route) is a national measure that is in a way coherent with the CR. However, its outcomes are not always automatically accepted by the formal education system. Because of this, validation has become less popular in the last few years.

Only in five Member States (CZ, EL, IE, LT, MT) were there stakeholders who pointed to a **lower degree of coherence** between measures in the CR and national measures related to VNFIL or relevant to VNFIL. The lack of coherence between the CR and national validation policies in these countries mainly refers to national systems not complying with the comprehensive approach put forward in the CR (e.g. CZ, MT) or to insufficient participation in VNFIL practices and lack of funding (e.g. LT).

In some countries a mixed response was received from certain stakeholders³⁹⁶:

- While authorities in Greece emphasised that they try to follow the CR and its measures, some inconsistencies in their application were found due to the top-down approach to governance in the country.
- In Ireland, the CR was generally considered as coherent with national measures covering further education and training in that all sectors have engaged more deeply with validation over the period 2012-2019 and funding programmes and national policies support this deepening engagement, bringing services closer to citizens. However, from a more practical perspective, there are no VNFIL measures *per se* so there is a disconnect between what the CR is stating and the take-up at the national level.

In **one** case, it was **not possible to evaluate coherence**, since no developments have occurred: Hungarian policies in areas closely related to VNFIL do not seem to be influenced by the CR. It would be an exaggeration to say that Hungary has had an inventive policy in these areas in recent years³⁹⁷.

³⁹³ Mikkola, Pia; Haltia, Petri (2019). *AIEMMIN HANKITUN OSAAMISEN TUNNUSTAMINEN KORKEAKOULUISSA. Selvitys aiemmin hankitun osaamisen tunnustamisen ja tunnistamisen periaatteista ja käytänteistä korkeakouluissa* [The recognition of previously acquired skills in Higher Education institutions. A review of the principles governing the recognition and identification of the previously acquired knowledge and practice in higher education institutions – Comment: study on RPL procedures in Finnish HEIs, conducted by the Ministry of Education], p. 16.

³⁹⁴ Launched in 2019 and has given additional impetus to VNFIL approaches. However, since Germany has a very mature and well-functioning VET system, the establishment of supplementary validation structures plays a subordinate role in current education policy.

³⁹⁵ The National Strategy for Lifelong Learning 2015-2020: <http://pubdocs.worldbank.org/en/944481496304564701/The-National-Strategy-for-Lifelong-Learning-mare.pdf>

³⁹⁶ Based on KIIs in EL and IE

³⁹⁷ Based on a KII in HU

In summary, there is overall good coherence between the CR and national policies on validation but also lifelong learning, particularly in those Member States that had little by way of validation before 2012. In some other countries, competing political priorities or specific governance arrangements may negatively affect the degree of coherence between the CR and national policies or strategies.

4.4.3 Coherence of CR with other relevant EU policy initiatives

The CR on VNFIL touches on several policy areas, such as education and training, employment, youth, guidance, migration, and has explicit links to a number of other policy initiatives and tools – the EQF, Europass, Youthpass and European instruments on credit and quality assurance. Coherence between these related initiatives and instruments refers to the following dimensions:

- Thematic coherence, i.e. the alignment of policy principles and objectives: In general, EU policies related to making learning visible, valuing learning independent of the context it takes place and flexible learning pathways have a thematic link to the CR on VNFIL.
- Conceptual coherence: Particularly the key principle of learning outcomes is the link between the related initiatives and instruments. Learning outcomes have been explicitly promoted in the European policy agenda for education and training since 2004. Learning outcomes – defined as ‘statements of what a learner knows, understands and is able to do on completion of a learning process’ – take the focus away from input factors such as duration, pedagogical methods, location etc. and shift this to achievements of individuals in terms of learning, irrespective of where and how these have been acquired.
- Organisational coherence, such as co-ordination in the management and implementation.

The following subsections examine thematic, conceptual and organisational coherence between the CR and the following EU policy initiatives and instruments: the EQF Recommendation (2008/2017); EU credit systems; EU transparency tools; EU quality assurance instruments; and the 2016 Upskilling Pathway Recommendation.

It concludes with an overview of national perspectives on coherence between the CR and EU policy initiatives and instruments in general.

4.4.3.1 European Qualifications Framework (EQF)

The Recommendation on the European Qualifications Framework (EQF) for lifelong learning was first adopted by the Council in 2008 and in 2017 repealed by a revised Recommendation. Conceptually, both initiatives are based on the learning outcomes approach and the thematic link between the two initiatives is explicitly spelled out in the two Recommendations:

- One of the wider aims of the EQF Recommendation is to ‘better linking formal, non-formal and informal learning and supporting the validation of learning outcomes acquired in different settings.’
- One of the principles of the CR on VNFIL is that ‘the validation arrangements are linked to national qualifications frameworks and are in line with the European Qualifications Framework.’

Based on developments by 2018, Cedefop assessed that NQFs have improved validation of non-formal and informal learning.³⁹⁸

Coherence between the CR on VNFIL and the EQF is further enhanced by the organisational structure in place: The EQF advisory group (EQF AG) had been established following the 2008 EQF Recommendation and was confirmed by the 2017 EQF Recommendation. The EQF AG is composed of representatives of national authorities, European social partners and stakeholders' organisations, with the Council of Europe as a standing partner, and is coordinated by the Commission with the support of Cedefop and the involvement of the ETF. The mandate of this group also includes the follow up of the CR on VNFIL, ensuring the representation of youth organisations and the volunteer sector and granting national authorities the opportunity to appoint a second representative to specifically follow the issues related to validation.

4.4.3.2 European instruments related to credit systems

The CR on VNFIL identifies as a key principle that '*(j) synergies exist between validation arrangements and credit systems applicable in the formal education and training system, such as ECTS and ECVET*'. Such crediting procedures usually are about the certification of components of qualifications, and validation arrangement most often certify components of qualifications rather than full qualifications.

The 2018 Inventory synthesis report notes that the principle of 'synergies with credit systems (ECTS and ECVET)' is still at medium level of implementation.

In particular, the take-up of ECVET in relation to validation policies and practices is apparently very limited. However, this is mainly due to the fact that ECVET is only in very few countries implemented as a credit system for supporting lifelong learning. The ECVET Recommendation is currently being reviewed³⁹⁹ and while its objectives and main principles will still be relevant, several options for the future of ECVET are being discussed (such as developing ECVET as a tool supporting mobility to be mainstreamed in the new Erasmus Programme or embedding the functions of ECVET within other EU instruments – EQF, Europass, Erasmus programme – in an overarching VET Recommendation).⁴⁰⁰

4.4.3.3 European transparency tools for documenting learning outcomes

The CR on VNFIL highlights the importance of using appropriate tools and instruments for the documentation of learning outcomes that allow for validation of non-formal and informal learning and draws attention to the relevance of common European tools for transparency, such as Europass and Youthpass.

While the 2018 Inventory synthesis report mentions that transparency tools are used in many Member States to facilitate the documentation of learning outcomes (mainly Europass and to a lesser extent Youthpass⁴⁰¹ and national tools), the extent to which it is frequently used to document VNFIL outcomes specifically remains unclear to date.

Thus, it was decided that Europass should be revised to allow for the identification and documentation of skills, including skills audits, acquired through non-formal or

³⁹⁸ Cedefop (2019). Qualifications frameworks in Europe – 2018 developments. Briefing note, May 2019, p. 4. https://www.cedefop.europa.eu/files/9139_en.pdf

³⁹⁹ DG EMPL (2018). Study on EU VET instruments (EQAVET and ECVET). Luxembourg: Publications Office of the European Union, 2019

⁴⁰⁰ ECVET Secretariat (2019). ECVET Thematic Seminar: Tools for VET-learner mobility 3 and 4 October 2019, Brussels Synthesis Report. <http://www.ecvet-secretariat.eu/en/system/files/documents/3992/ecvet-thematic-seminar-tools-vet-learner-mobility-flash-report.pdf>

⁴⁰¹ See also: Cedefop; European Commission; ICF (2016). Validation in the care and youth work sectors. Thematic report for the 2016 update of the European inventory on validation. Luxembourg: Publications Office.

informal learning, with or without geographical mobility⁴⁰². The latest 2018 Europass Decision⁴⁰³ is to provide, through an online platform, web-based tools for (among others) documenting and describing skills and qualifications acquired through working and learning experiences, including through mobility and volunteering. The Europass online platform (to be launched in spring 2020) is also to provide information on opportunities for VNFIL.

Thus, the new Europass – understood as a tool for lifelong learning and career management – will have greater coherence with the CR on VNFIL both thematically and conceptually.

It consists of three main elements: Digitally-Signed Credentials which state that the owner has certain skills or has achieved certain learning outcomes through formal, non-formal or informal learning; E-Portfolio (users can create a user account and develop their personal e-portfolio); Information related to skills and qualifications.

One of the key transversal features of the new Europass is interoperability. Based on interoperability with EURES (EUROpean Employment Services), Europass can be used for job matching, making use of the ESCO⁴⁰⁴ classification, i.e. allowing users to get job offers through Europass.

4.4.3.4 European instruments on quality assurance

Quality assurance instruments at European level mainly relate to the European Standards and Guidelines (ESG) for Quality Assurance in HE⁴⁰⁵ and the European Quality Assurance Reference Framework for VET (EQAVET)⁴⁰⁶.

- While focusing on the formal VET system, the ECVET Recommendation also aims to support the identification and validation of NFIL. One of the indicative descriptors at VET-system level (proposed to support Member States, as they deem appropriate, when implementing the Framework) refers to 'Standards and guidelines for recognition, validation and certification of competences of individuals.' The EQAVET Recommendation is currently being reviewed and it has been observed that it was generally not expected to have a significant impact on VNFIL given its focus on formal learning. Consequently, there has been little alignment between VNFIL and EQAVET developments across the Member States.
- The ESG (first adopted in 2005 and revised in 2015) are implemented by a voluntary network of quality assurance organisations in HE (ENQA) and through a self-regulation approach where HE institutions sign up to a register of that adhere to high quality assurance standards (EQAR). The ESG refer to the fair recognition of non-formal and informal learning.

The CR on VNFIL asks for transparent quality assurance measures in line with existing quality assurance frameworks to support reliable, valid and credible assessment. Thus, in those Member States EQAVET and ESG are in place, these instruments can theoretically be used to build bridges between formal learning and non-formal and

⁴⁰² European Commission (2013). REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT AND THE COUNCIL - Evaluation of the Europass initiative. Second evaluation of the Decision of the European Parliament and the Council on a single Community framework for the transparency of qualifications and competences (Europass). Brussels, 18.12.2013 COM (2013) 899 final, p. 10.

⁴⁰³ Decision (EU) 2018/646 repealing Decision No 2241/2004/EC.

⁴⁰⁴ European Skills, Competences, Qualifications and Occupations

⁴⁰⁵ Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). (2015). Brussels, Belgium. https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf

⁴⁰⁶ Recommendation of 18 June 2009 on the establishment of a European Quality Assurance Reference Framework for Vocational Education and Training (Text with EEA relevance) (2009/C 155/01). <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2009:155:0001:0010:EN:PDF>

informal learning. It is yet to be seen whether the revised EQAVET will place greater emphasis on non-formal and informal learning to improve coherence or alignment with the CR on VNFIL.

4.4.3.5 Upskilling Pathways

The 'New skills agenda for Europe' was launched in June 2016, with the Upskilling Pathways (UP) initiative constituting one of its key elements. The link between the CR on VNFIL and the UP is explicit: the latter calls for all low-qualified adults to be given the opportunity for an assessment of their skills, which is intended to support the establishment of tailored and flexible upskilling programmes. Moreover, this can be the first step for a full process of validation, including the certification of skills that low qualified adults have developed outside institutional education and training. There is thematically and conceptually a high degree of coherence between the CR on VNFIL of 2012 and the UP of 2016, especially as the latter takes fully into consideration of the the former.

4.4.3.6 Overview of perspectives on coherence in the Member States

Coherence with a wide range of other relevant European policy initiatives and instruments were noted by stakeholders from **14 Member States** out of the 21 for which relevant information could be collected: AT, BE, CY, CZ, EL, FI, HR, HU, IE, IT, MT, PL, SE⁴⁰⁷, SI⁴⁰⁸. In some cases, policy initiatives and instruments were explicitly mentioned⁴⁰⁹:

- EQF (AT, BE, CY, CZ, EL, HR, HU, IE, PL, SE, SI)⁴¹⁰
- ECVET (BE, CY, CZ, EL, HR, MT, SI)⁴¹¹
- EQAVET (BE, CZ, EL, HR, IE, SI)
- Europass (BE, CZ, HR, HU, IE, IT)⁴¹²
- ESCO (HU)
- Upskilling Pathways Recommendation (BE, CZ, EL, HU, IE, MT)

Several stakeholders reported that validation arrangements in their respective country cater for people missing basic skills, in accordance with the shared principles of the CR and the Upskilling Pathways Recommendation⁴¹³:

- In French-speaking Belgium, validation centres provide short training modules adapted to candidates who lack certain basic skills (e.g. language) to fulfil a

⁴⁰⁷ In Sweden, this refers to the NQF and the Bologna process (and the Lisbon convention on recognition). No formal decision has yet been taken on implementing the policy initiatives on ECVET and EQAVET.

⁴⁰⁸ No statement was made on this subject by the interviewees from seven MS (DE, DK, EE, LT, LU, LV, UK).

⁴⁰⁹ However, it should be noted that this list is not exhaustive. Some interviewees have, for example, given only examples or highlighted the instruments with which the greatest degree of overlap is seen. It is therefore quite possible that in some cases coherence may also be observed in other Member States than those listed in brackets for the respective instruments and initiatives. In addition, it should be noted that some respondents stressed that they see only the coherence between the CR and the explicitly mentioned other instrument, but not with others.

⁴¹⁰ For further information see section 4.2.2.2

⁴¹¹ ECVET is, however, not used in Slovenia.

⁴¹² An Italian stakeholder pointed out that synergies are currently very clearly outlined in the implementation of the new Europass framework web-based, where all tools, services and relevant information about guidance will be displayed for EU citizens and for EU operators (Learning providers and employers). Within the new Europass portal, validation of non-formal and informal learning is considered one of the top priorities in building the referred section of the portal devoted to citizens' individual career management.

⁴¹³ Based on Expert group meeting discussions

qualification standard. A project has also been launched for the recognition of transversal skills as an indicator of employability – such skills are included in the vocational profiles accompanying the qualification standards against which candidates are assessed. Furthermore, outreach and information sessions – e.g. job fairs, 'bus tours' – are used to promote flexible training opportunities as part of the validation process.

- In the Czech Republic, skills audits are provided in accordance with the principles of Upskilling Pathways, covering the identification and documentation stages of the validation process. However, these first two stages do not officially feature in Czech legislation on validation.
- In Malta, Level 1-3 training courses are provided by lifelong learning centre for potential validation candidates to fulfil a qualification standard. While training the low-qualified to follow through to validation remains challenging, the CR and Upskilling Pathways have both had an influence on the offer of basic skills courses to complement and give value to the knowledge they already possess.

Respondents from **seven Member States** (BG, ES, FR, NL, PT, RO, SK) pointed to **insufficient coherence with other relevant European policy initiatives and instruments**. In most cases, however, these arguments refer to lack of coherent organisational arrangements for implementation, which is in fact due to lack of use of the instruments rather than to a lack of coherence between the objectives of different European initiatives and the CR (this was observed for ECVET in Slovakia⁴¹⁴; ECVET, EQAVET and Europass in the Netherlands).

In summary, there is a good degree of thematic and conceptual coherence between the CR on VNFIL and other relevant EU instruments and initiatives; coherence in this regard is strongest for EQF and UP. It can be expected that the foreseen revisions to ECVET and the new Europass will further improve their thematic and conceptual coherence with the CR on VNFIL.

Organisational coherence is nevertheless the weakest overall, especially when taking into account implementation experiences across the Member States. This however tends to suggest a lack of use of various EU instruments in the context of VNFIL at the national level.

Again, it can be expected that any improvements of thematic and conceptual coherence between EU credit systems and transparency tools on the one hand and the CR on VNFIL on the other will naturally result in improved organisational coherence across the Member States; i.e. once the scope for use of such instruments in a VNFIL context is strengthened and clarified.

4.5 EU added value

This section looks at three aspects of EU added value⁴¹⁵:

- Volume effect: the extent to which the objectives enshrined in the CR would have been achieved without the intervention of the EU.
- Scope effect: the extent to which the CR is contributing to the convergence of national VNFIL approaches resulting in greater benefits across the EU.
- Process effect: the extent to which the CR has influenced national policy in VNFIL-related areas (e.g. career guidance, vocational training, skills audits).

⁴¹⁴ EQAVET, however, is used and considered more in line with the CR on VNFIL in Slovakia.

⁴¹⁵ Relates to Evaluation Question 7 in the Terms of Reference

4.5.1 *Volume effect: could the objectives of the CR have been achieved sufficiently by Member States acting alone?*⁴¹⁶

This section examines the extent to which the objectives of the CR could have been achieved by Member States acting alone, and the extent to which the main results/ outputs identified in the evaluation could have been achieved without EU intervention.

The greatest volume effects in this respect were identified in Member States where VNFIL arrangements were almost inexistent prior to the introduction of the CR in 2012: BG, CY, EL, IT, MT, PL, RO. In many of these countries (BG, CY, EL, PL, RO⁴¹⁷), EU funding support strengthened implementation efforts at the national level by providing additional capacity for the development of VNFIL systems and processes.

In Italy, the CR was reported to have enabled the scaling up of VNFIL and the convergence of regional practices through the definition of common minimal standards in national legislation⁴¹⁸. In Malta, the CR was understood as a compendium of good practice and therefore shaped the national approach to VNFIL⁴¹⁹.

Conversely, volume effects appear to be lesser in the case of more advanced or already well-established VNFIL systems (e.g. FR, LU, NL).

However, in seven Member States (BE, CZ, ES, FI, IE, SE, and SI), the view reported is that the CR has given some impetus to already existing national validation strategies or actions.

In Belgium⁴²⁰ and Spain⁴²¹, it was argued that governments acting alone would most probably not have made the same level of progress towards achieving the objectives of the CR. The perception in Slovenia was the provision of VNFIL would not have been as comprehensive and balanced across different areas without the CR⁴²².

In Finland⁴²³ and Sweden⁴²⁴, the CR was reported to have given a new strategic direction to VNFIL policy even though both countries already had advanced and relatively comprehensive VNFIL systems by 2012. A similar observation was made for Ireland where it is understood the CR may have influenced discussions and decisions on VNFIL provision⁴²⁵.

In the Czech Republic, the CR was reported to have given VNFIL validation greater visibility at the national level and was a useful resource for policy stakeholders in developing national education and training strategies⁴²⁶.

In Austria and Slovenia, it was argued that the evolution of VNFIL arrangements in recent years may not have come so much from the CR as from added value as other EU initiatives (such as ET2020, the Copenhagen and Bologna processes in Austria⁴²⁷, and the EQF Recommendation in Slovakia⁴²⁸).

The results of the public consultation reveal that 63% of the responding organisations (102 out of 162 respondents) believed that the CR has contributed to generating

⁴¹⁶ Relates to Sub-question 7.1 of the Terms of Reference

⁴¹⁷ Confirmed based on KIIs in BG, CY, EL, PL, RO.

⁴¹⁸ Based on KIIs in IT

⁴¹⁹ Based on a KII in MT

⁴²⁰ Confirmed based on KIIs in BE-fr and BE-nl.

⁴²¹ Based on a KII in ES

⁴²² Confirmed based on KIIs in SI.

⁴²³ Based on a KII in FI

⁴²⁴ Based on a KII in SE

⁴²⁵ Based on a KII in IE

⁴²⁶ Based on a KII in CZ

⁴²⁷ BMB & BMFWF (2017). *Strategie zur Validierung nicht-formalen und informellen Lernens in Österreich* <https://bildung.bmbwf.gv.at/euint/eubildung/vnfil.PDF?69ai4p>

⁴²⁸ Based on a KII in SK

national action towards more and better validation opportunities⁴²⁹ and that 60% (97 respondents) believed that the CR also contributed to enhancing the availability of validation in their respective country⁴³⁰, either to a high extent or to some extent.

Among the different organisation types, 45% of the respondents on behalf of companies or business organisations (5 out of 11) most frequently agreed to a high extent that the CR both contributed to national actions towards more and better VNFIL opportunities and to enhancing the availability of VNFIL. Conversely, respondents on behalf of trade unions most frequently thought that the CR only contributed to a little extent to national actions towards more and better VNFIL opportunities (29% or 2 out of 7 respondents; vs. 20% overall) or to enhancing the availability of VNFIL (57% or 4 respondents vs. 23% overall). Responses from organisations in Italy⁴³¹ and Portugal⁴³² – countries with most numerous answers – largely follow the overall trends. Overall, a considerable number of responding organisations highlighted that the CR has given impetus to policy activity in the field⁴³³.

Available evidence overall shows that the CR has contributed to progress towards establishing the recommended VNFIL frameworks and improving the availability of validation services at the national level. In other words, the CR's intended objectives would not have been achieved to the same extent by Member States acting alone.

4.5.2 *Scope effect: Were there benefits in replacing different national approaches with a more homogenous policy approach?*⁴³⁴

This section begins by examining the existence of benefits in replacing different national approaches to VNFIL with a more homogeneous policy approach, and the extent to which national systems are converging as a result of the CR. This is reviewed with reference to the understanding of validation and the nature of existing validation arrangements in the Member States. It then goes on to analyse the scope effects of the CR in terms of influencing or inspiring policies in other VNFIL-related areas.

It should first be noted that the CR was designed to be sensitive to the existence of national "circumstances and specificities", which justifies the ongoing differences in validation arrangements from one country to another.

Nevertheless, there is agreement to some extent that the CR has helped to develop a more common understanding of validation across the EU Member States including those that had already well-established VNFIL systems by 2012. This view was shared by national-level stakeholders in nine Member States (BE, BG, CZ, CY, DE, HU, SE, SI and SK) as well as among the participants of the Expert group meetings held as part of this evaluation study⁴³⁵.

- Going further, stakeholders in Belgium as well as a representative of an EU umbrella organisation in the youth sector attributed some degree of national policy convergence to the peer learning and information exchange activities organised by the European Commission since 2012.

⁴²⁹ OPC Q12

⁴³⁰ OPC Q13

⁴³¹ 4 out of 15 responding organisations agreed 'to a high extent' and 5 'to some extent' that the CR has generated national action towards more and better validation opportunities; 3 out of 15 responding organisations agreed 'to a high extent' and 6 'to some extent' that the CR has contributed to make validation more available to people.

⁴³² 3 out of 16 responding organisations agreed 'to a high extent' and 6 'to some extent' that the CR has generated national action towards more and better validation opportunities; 2 out of 16 responding organisations agreed 'to a high extent' and 9 'to some extent' that the CR has contributed to make validation more available to people.

⁴³³ Based on the review of 63 open answers to Q12.a

⁴³⁴ Refers to Sub-question 7.3 of the Terms of Reference

⁴³⁵ See Expert group meetings report

- On the other hand, it has been argued that policy convergence on validation in Nordic countries was linked to the work of the Nordic Network of Adult Learning (NVL), which may have inspired the CR by advocating at EU level the importance of enhancing links between national qualification frameworks and non-formal or informal learning, and of improving the coordination and quality assurance of VNFIL systems⁴³⁶.

Experiences from certain other Member States however reveal that the CR has not necessarily led to a more common understanding of VNFIL.

- For Austria, documentary sources suggest that what is exactly meant by validation in the national validation strategy is not fully clarified, with the concept of validation needing further specification.⁴³⁷
- In Croatia, it was highlighted that there is currently no national consensus or a standard definition of VNFIL even if the revised 2018 Croatian Qualification Framework Act might contribute to progress in this regard⁴³⁸.
- Luxembourg is reported to be experiencing a lack of domestic convergence in VNFIL policies due to its three-strand system (general education, VET, higher education)⁴³⁹.
- It has also been argued that many Member States do not seem to be building a single central system or comprehensive model for VNFIL, but rather specific arrangements, tools and approaches deemed fit for purpose in different areas⁴⁴⁰. There are indeed many differences across Member States in terms of sectoral and competence coverage and on the ultimate aims of VNFIL⁴⁴¹ – for instance, whether it is about improving access to employment only or about giving everyone a chance to participate in society, such as through volunteering⁴⁴².

In addition, results from the public consultation⁴⁴³ reveal that some responding organisations indicated that there is too little public discourse that would facilitate a common vision of validation among experts and policymakers, at both national and EU level.

⁴³⁶ Nordic Network for Adult Learning (2019). Validation of prior learning in the Nordic region – Connecting People and Policies. Policy brief. https://nvl.org/Portals/0/DigArticle/15791/NVL_Policy_brief_Validation_EN.pdf. View also based on an interview with a representative of the agency for high VET in SE.

⁴³⁷ See: Luomi-Messerer, Karin (2019). *Die österreichische Validierungsstrategie. Hintergrund, Entwicklung, Ausrichtung und erste Umsetzungsschritte*. In: Magazin erwachsenenbildung.at. Das Fachmedium für Forschung, Praxis und Diskurs. Ausgabe 37, 2019. Wien. <https://erwachsenenbildung.at/magazin/19-37/meb19-37.pdf>. / Lassnigg, Lorenz (2019). Paradoxe, unintendierte Begleiterscheinungen von Validierung non-formalen und informellen Lernens Beitrag für MEB 37, Juni 2019, Draft-Version, Langfassung [Paradoxical, unintended side-effects of validation of non-formal and informal learning Contribution for MEB 37, June 2019, draft version, long version]. <http://www.equi.at/material/valid-1f.pdf>, p. 1 / Schlögl, Peter (2017). *Schaffung eines strategischen Rahmens zur Validierung nicht formaler und informeller Lernergebnisse. Eine Zwischenbilanz aus Österreich*. [Establishing a strategic framework for the validation of non-formal and informal learning outcomes. Interim results from Austria]. BWP 6/2017, pp. 28-31. Also confirmed by a representative of the ministry of education in AT.

⁴³⁸ 2018 European Inventory – Croatia country report

⁴³⁹ Luxembourg ‘one-off’ report, 2019

⁴⁴⁰ Based on KIIs in AT, DE, FI, HU, NL

⁴⁴¹ Based on an interview with an EU umbrella organisation

⁴⁴² This contrast was particularly clear during the PLAs dedicated to transversal skills acquired in volunteering sector (January 2019) and the one dedicated to cooperation with civil society organisations (September 2017).

⁴⁴³ Based on the review of 63 open answers to Q12.a

Turning to scope effects in terms of the CR's influence in other policy areas relevant to validation⁴⁴⁴, this was reported in eleven Member States⁴⁴⁵ (BG, CY, CZ, ES, HR, IT, LT, PL, PT, SE, SI), most of which have relatively recent VNFIL systems. More specifically, the CR's influence was most frequently highlighted in relation to the updating or modernisation of:

- Career guidance policies and practices (CY, CZ, ES, HR, PL, PT, SI)
- Labour market activation policies, particularly skills auditing (LT, PL, PT, SE, SI)
- Lifelong learning policies (BG, HR, PT, SI) and VET systems (BG, CY, CZ, PL)
- Qualification and certification systems (CY, IT)
- Flexibility of provision in Higher Education (HR)

In summary, the CR has had some influence in fostering a more common understanding of VNFIL, but this has not naturally led to a more homogeneous policy approach across the EU in theory or practice. The many specificities of Member States' VNFIL systems can still be observed today, and differences in sectoral coverage subsist, which raises the question as to whether a shared vision of validation among stakeholders from different backgrounds is indeed possible.

On a positive note, the CR appears to have influenced policies and practices in validation-related areas in a considerable number of Member States, particularly career guidance.

4.5.3 Sustainability and process effect: To what extent do the issues addressed by the Recommendation continue to require action at EU level?⁴⁴⁶

There is a consensus across the different Member States that continued action at EU level on validation is still needed, albeit relatively different reasons were given by the responding national-level stakeholders to support this view.

The role of validation according to key EU strategies (e.g. Europe 2020, EU Pillar of Social Rights) is to facilitate citizens' insertion into and progression within the labour market for more inclusive societies while improving the matching of labour supply and demand. In eleven Member States⁴⁴⁷ (BE, BG, CZ, DE, ES, HR, IE, IT, LT, PT and SE), there was agreement that continued EU level action in the area of VNFIL is still required for achieving these goals.

A recurring view is that current and future EU action and policy direction keeps VNFIL on the national policy agenda as an effective solution to address the challenges posed by a rapidly changing labour market characterised by digitalisation, new forms of work and industrial reconversions.

In five Member States⁴⁴⁸ (EL, FI, HR, SI and SK), EU action on VNFIL was still deemed necessary to encourage the development of comprehensive systems at the national level.

- One of the strongest rationales for continued EU action came from Slovakia, where the CR is reported to have changed perceptions on VNFIL in leading to inter-ministerial discussions on how to expand its scope⁴⁴⁹.

⁴⁴⁴ Also see subsection 4.5.2 on Coherence between the CR and national policies

⁴⁴⁵ Based on KIIs in BG, CY, CZ, ES, HR, IT, LT, PL, PT, SE, and SI

⁴⁴⁶ Refers to Sub-question 7.3 of the Terms of Reference

⁴⁴⁷ Based on KIIs in BE, BG, CZ, DE, ES, HR, IE, IT, LT, PT and SE

⁴⁴⁸ Based on KIIs in EL, FI, HR, SI and SK

⁴⁴⁹ Based on a KII in SK.

- In both Croatia and Slovenia, it was argued that EU VNFIL interventions are still needed to address skills matches as well as the ongoing issue of young people dropping out of formal education⁴⁵⁰.

In several Member States, some stakeholders expressed the view that EU policy on validation should be reviewed or updated for it to add even greater value to national policy actions (AT, IE, LT, MT, NL, SE). A recurrent point was that the CR's approach to VNFIL might be too broad or generic leading to divergences in interpretation⁴⁵¹.

- In Austria, a suggestion was made that adapting provisions to specific areas (education and training, labour market, third sectors) or levels of governance (national, regional, local) might promote VNFIL more effectively⁴⁵².
- In Lithuania and Sweden, it was argued that target groups should be better defined and differentiated to ensure arrangements adapted to their respective needs⁴⁵³.
- In the Netherlands, a point was made that an update of the CR should feature the array of instruments that exist and are available for supporting VNFIL (e.g. exemption procedures, intake assessments, portfolios) like in the 2015 European Guidelines for VNFIL⁴⁵⁴.

The evidence gathered shows that validation is strongly believed to require continued and future EU action, especially in Member States with more recent VNFIL systems. In addition, stakeholders representing youth organisations and lifelong learning bodies at the EU level agreed that such interventions in the area of VNFIL is still needed to drive progress in the development of validation systems across the Member States.

5 CONCLUSIONS AND LESSONS LEARNED

This section presents the conclusions and a set of lessons learned for each of the five evaluation criteria: Effectiveness, Efficiency, Relevance, Coherence, EU added value.

The conclusions have a strong analytical component, expanding on the research findings presented in Section 4.

The lessons learned are derived from the conclusions presented in this section and cover two dimensions:

- The operational dimension: relating to the provisions of the CR that may need reviewing.
- The strategic dimension: relating to how validation may be better addressed by EU policy more broadly.

A subsection is specifically dedicated to lessons learned regarding evaluation and monitoring needs, as the lack of data relating to the implementation of the CR constituted a major limitation to the research throughout this study.

⁴⁵⁰ Confirmed based on KIIs in HR and SI.

⁴⁵¹ Based on KIIs in AT, IE and MT.

⁴⁵² Based on a KII in AT

⁴⁵³ Based on KIIs in LT and SE.

⁴⁵⁴ Based on a KII in NL.

5.1 Effectiveness

5.1.1 Conclusions

This subsection first reviews progress with regards to the general objectives of the CR, and second, its specific objectives. It then discusses the links between the progress observed and the CR, this is, its contribution to progress. The section finally outlines lessons learnt in relation to the effectiveness of the CR. The 2010 European Inventory noted that around two thirds of the countries it covered had a medium-low to low degree of development in their validation systems. Two years after the CR, the 2014 Inventory noted an expansion in the development of national validation strategies and policies, which continued their steady progress up to 2018, with more countries having transformed policies into practice. This provides the general context in which to look at the degree of effectiveness in the achievement of the objectives of the CR, examined in this evaluation.

5.1.1.1 General objectives

Member States have overall made relatively good progress towards meeting the general objectives of the CR since 2012. The first general objective of the CR refers to the provision of greater opportunities to validate knowledge, skills and competences acquired outside of formal education and training. The baseline assessment undertaken for this evaluation shows that Member States have improved the availability of, and accessibility to, validation initiatives since 2012. By 2018 all EU Member States offered validation procedures in at least one area (education and training, labour market or third sector), and available data on the take-up of validation generally suggests an up-wards trend. The results from the public consultation show that those respondents who had undergone validation frequently appreciated the fact that it gave them the opportunity to benefit from a truly personalised learning experience. There is also a high degree of consensus that the CR has raised the profile of validation in the policy discourse and serves as a framework to organise and negotiate structural support for validation in national policy. However, the evaluation has shown that despite the progress achieved the coverage of validation remains partial and asymmetrical in the EU. Provision is still far from being comprehensive in most EU Member States which tend to prioritise validation in relation to certain areas, subjects, sectors or occupations, and not others, thus limiting opportunities for the widest possible access to validation.

The second general objective of the CR referred to the provision of opportunities to use validated skills and competences for working and learning purposes across the EU. Regarding this objective, most Member States report improvements on the integration of their validation systems and formal education. This has been reflected particularly in the enhancement of the links between validation and formal qualification and credit systems. Almost all Member States are reported to have linked validation to their respective NQFs, which themselves are aligned to the EQF. Validation allows for the award of full or partial qualifications in an increasing number of counties, and the recognition and acceptance in other countries of these is in theory supported by EU transparency policy and tools. The evidence on the effects of validation on the improvement of labour market prospects is scarce. There is available evidence of improvements in some countries, such as EL, ES, IT or SE, but this is not the case in most others.

5.1.12 Specific objectives

The baseline assessment also shows good progress towards meeting the specific objectives and applying the key principles of the CR across the EU⁴⁵⁵.

- The four-stage approach has been broadly adopted in most Member States, often with terminological and procedural adaptations in their respective validation systems and practices, which can include emphasis on certain stages depending on Member State.
- Validation allows for the award of full or partial qualifications, or credits towards them, in an increasing number of countries –the increase in relation to credits has indeed been very marked. Validation often complies with the same or equivalent standards to those obtained through formal education programmes.
- Links between validation and NQFs have been established in most Member States, as various countries have been developing their NQFs, and linked them to the EQF, since 2012. It should be noted, however, that not all possible links have been developed in Member States. For example, by 2018 VNFIL could be used to access formal education linked to NQF qualifications in 17 Member States. In some countries, links have been established at some EQF levels but not others.
- There has been notable progress in the inclusion of transparent quality assurance measures in validation initiatives – primarily driven by the increase in the number of countries with QA frameworks that are specific to validation – and in the link between those initiatives and formal credit systems, including ECVET and ECTS.
- Lack of awareness on validation is a major barrier to access, although its importance varies by country and by economic sector within countries, as the French case suggests. The availability of information and guidance before and during validation appears to have improved across the Member States since 2012. The findings suggest that guidance on the process of validation initiatives –once an individual is aware of a validation initiative- is more widespread than the embedding of guidance on the existence and benefits of validation initiatives in generic guidance services. For example, guidance on validation is yet far from being common practice when working with unemployed adults. This means that there is scope for further development in bringing together policies on validation, guidance and up-skilling in national strategies.
- The CR noted that validation is likely to benefit disadvantaged groups in particular. Both, the validation initiatives that aim to support disadvantaged groups and skills audit opportunities have increased notably across the Member States since 2012. Nevertheless, a major challenge continues to be the high barriers to entry that persist for such groups. These include the costs, complexity and length of validation processes, service fragmentation and the perceived low value of validation in certain countries.
- While there has been progress in the provisions to ensure that staff involved in validation develops appropriate competences, this is an area where further progress is required, as the provision of training opportunities for staff involved in validation is consistent in only around half of the Member States.

⁴⁵⁵ These are outlined below following the order presented in the ToR sub-question 1.2, but information on additional aspects (links to European Transparency Tools, multi-stakeholder cooperation and EU follow-up activities) related to the specific objectives of the CR –as outlined in the intervention logic- have also been included. Some of those aspects are related to Evaluation question 2.1 and 2.2.

- While most Member States have encouraged multi-stakeholder cooperation on the development of validation systems and services, there are still countries where this is not the norm. There is also variation in the stakeholder types involved, which reflects country-specific systems. As such, the development of strategic partnerships in the area of validation tends to respond to country-specific priorities.
- While learning providers often allow access to formal programmes following validation of prior learning, this is not an access route that is generally sufficiently promoted and publicised.
- No clear picture emerges as to the extent to which EU Transparency tools are used in validation processes. Europass and Youthpass appear to be the most popular tools to document the skills people have developed through specific experiences. In some cases, like ES, some validation processes require the use of these tools, whereas SE has given regard to the documentation of validation outcomes being compatible with EU mobility tools.
- Regarding follow-up of the CR and its support mechanisms, national-level stakeholders value the follow-up activities offered by the EU (Commission and Cedefop) on the implementation of the CR.
 - Follow-up has been ensured through the EQF advisory group, report on progress following the recommendation has been provided (although Joint Reporting Exercises in validation have had a lower profile than in relation to other areas and ET2020 reports do not cover validation in depth), and Cedefop has reported on validation in its reports on NQFs.
 - Support activities have taken the form of peer-learning activities, the updating of the European Guidelines for VNFIL and the European Inventory on Validation, and funding from EU programmes. These support activities were highly valued and have served to raise national stakeholders' awareness and to promote good practices in the area of validation. Peer learning is also generally valued. EU funding programmes appear to have been most effective in the early-stage development of validation systems and services in the countries that joined the EU in or after 2004.

Overall, however, and in spite of these activities, stakeholders consider that support activities in the area of validation are more limited than for other EU initiatives and processes in related areas, such as the EQF or the Bologna process. There is less intense monitoring than in those cases and support activities have not always given Member States enough impetus to act to implement the principles of the CR systematically and comprehensively.

5.1.13 Contribution

The links between the positive trends previously mentioned and the CR are generally difficult to establish – see for example the discussions in the report regarding skills audits (where only in a few countries progress could be directly linked to the introduction of the CR), quality assurance or multi-stakeholder approach. Challenges referred in large part to the existence of a number of other European and national initiatives in related areas, without which the CR would have had more limited effects. Indeed, changes in the area of validation are not isolated from other reforms (e.g. of lifelong learning systems) that have taken place in the EU during the last decade.

Without developments in the creation of NQFs and the shift to learning outcomes in European lifelong learning systems, most notably, it would have been difficult to observe similar progress to that reported in the evaluation, even in the presence of the CR. Such developments push validation forward as they create conditions that facilitate the adoption of actions and policies related to it. These, in turn, make education and training systems more responsive to individuals' needs, more flexible

and permeable, allowing for the recognition of learning regardless of the context in which it has taken place and facilitating progression within lifelong learning systems through individualised pathways. In this respect, the contribution of the CR to the progress observed most often takes the form of a contributory factor, rather than the only factor explaining changes and progress.

However, two aspects are to note:

- First, there were several cases in which those links could be observed. This occurred particularly in countries that were at an early stage of development regarding validation in 2012. In this respect, the CR has had an effect in terms of the reduction of disparities in the level of development of validation systems across the EU. The CR contributions were also made clear in the evaluation, for example in terms of providing visibility to validation at national level and having what could be called a 'structuring effect' on the issues addressed by national reforms –related to the priority measures that the CR outlined. Moreover, the public consultation undertaken for the evaluation also suggested that the CR has contributed to the generation of national policies towards more and better validation –a view held by around two thirds of responding organisations.
- Second, where the evaluation found that the link between the progress observed and the CR was not clear, this most often referred to a lack of sufficiently strong data to establish that link rather than to the existence of data on the absence of the link. The latter occurred only in a minority of cases.

5.1.2 Lessons learned

The effectiveness of the CR has been different across the EU Member States. This could be expected for two reasons. First, Member States were at different stages of development on validation in 2012. Second, the CR primarily outlined the need to set up certain validation policies, structures and practices (for those very Member States nothing or almost nothing in place).

As a result, those Member States where validation arrangements did not exist for the most part had clearer indications on what was expected from them compared to those Member States with advanced validation arrangements (the latter group interpreted the CR as not presenting requirements for them). Future measures could consider complementing the nature of what is required from a focus on the establishment of initiatives or systems to more performance-based goals, in order to stimulate action in all countries.

While respect for national needs and circumstances is important, future initiatives could also be more specific regarding requirements to develop validation systems in a comprehensive way, improving their coverage of the education and training area, the labour market area and the third sector. The development of validation measures across sectors will aid the further achievement of the objectives set out in the CR.

Future actions could take a variety of forms, for example an update of the CR, and/ or the establishment of more stringent forms of Open Methods of Coordination (OMC) in this area. There may also be scope for a future EU-level intervention bringing together the principles of the CR and those of related EU initiatives (e.g. Council Recommendations on Upskilling Pathways and on the integration of the long term unemployed into the labour market, New Skills Agenda, Youth Guarantee, etc.), to facilitate synergies between the policy areas of validation, labour market activation and lifelong learning on the one hand, and to contribute more effectively towards the wider EU objective of achieving sustainable economic growth and inclusive societies.

While there has been progress in relation to the adoption of a multi-stakeholder approach to the development of validation, the evaluation has found a lack of detailed knowledge of the CR amongst some of the targeted stakeholders in Member States. This suggests that there is a need for a more thorough dissemination and awareness

raising activities around this and related measures – including national validation measures – in the future. Together with awareness raising, consideration could be given to the stimulation of harmonisation of validation practices in educational institutions at the national level, in order to improve their accessibility and transparency for users.

5.2 Efficiency

5.2.1 Conclusions

The first evaluation question on efficiency refers to the costs and benefits of the CR⁴⁵⁶. In a few countries, the CR has been reported to contribute to rationalising the use of financial and other resources in the development and provision of validation. ESF co-financing has had capacity building effects in Member States where validation systems were still in their early stages of development in 2012, improving the cost-effectiveness of their implementation in the longer term. The evaluation came across various examples of past ESF-funded projects that led to the establishment of sustainable VNFIL arrangements. Smaller-scale validation initiatives co-financed by ESF may not always have the same degree of sustainability.

There is also a general belief amongst the EU and national-level policy stakeholders consulted that the benefits validation brings about for society and the economy exceed the costs of developing and providing validation services. However, evidence to prove it remains scarce. This is because whereas data on the benefits is more common, there is a dearth of evidence as to the costs generated by the implementation of the CR in Member States.

In a considerable number of Member States, there is no consolidated data on the costs associated with validation, which prevents an analysis of the proportionality of costs⁴⁵⁷. As mentioned, Member States generally reported that theoretically the benefits of validation should exceed the costs, but no data was provided to support this view, except in the case of SE, where a cost-benefit analysis carried out in 2018 showed that validation is profitable for both the economy and society. At European level, the costs of implementation of the CR have been relatively low and centred mainly around time of staff with expertise in the area, peer-learning and related activities and a small number of research projects. Collaboration with the EQF advisory group has enhanced the efficiency of implementation by reducing travel and time costs.

The evaluation of the factors that have influenced efficiency variations across Member States⁴⁵⁸ is again hampered by lack of data on the costs of evaluation initiatives. However, during the evaluation it was observed that in most countries, public funding constitutes an important resource for the development and provision of validation services. The lack of engagement from private sector stakeholders in the financing of validation initiatives leads to situations where costs are disproportionately borne by public institutions in certain Member States. This lack of engagement can be related to a lack of multi-stakeholder collaboration on validation. Conversely, there is some evidence to suggest that the application of the CR's principles on multi-stakeholder collaboration – whereby all parties can agree to a common vision on validation – is a factor of efficiency and helps to spread costs between different types of stakeholders, which can contribute to the sustainability of initiatives. Tailoring validation processes

⁴⁵⁶ Evaluation sub-question 4.1.

⁴⁵⁷ Evaluation sub-question 4.3

⁴⁵⁸ Evaluation sub-question 4.2.

to specific target groups can be another factor of efficiency, because it generates savings in the application of validation.

5.2.2 Lessons learned

The lack of systematic data on the costs of validation initiatives at Member state level hampers the possibility to undertake a full evaluation of the efficiency of the CR. Such lack of data is often due to validation initiatives being developed by various bodies independently and in the absence of a common legal or funding framework in Member States. Also, often, public spending on validation is amalgamated together with spending on other education/training or activation measures. Addressing these aspects in collaboration with Member States would enhance the possibilities of systematic analysis of the efficiency in the implementation of measures related to the CR.

There is a tendency among Member States to group the implementation of the CR together with the implementation of other related EU-level instruments when developing their own policies and initiatives on validation. This is a positive approach, to the extent that synergies and coordination in the national implementation of EU initiatives may result in efficient provision of services to individuals and organisations. However, this makes it more difficult to provide an accurate assessment of the impacts the CR has generated on its own.

Certain factors to improve the efficiency of validation provision are nevertheless worth considering from an operational perspective:

- Multi-stakeholder collaboration – whereby relevant parties can agree on a common vision on validation – can be a factor of efficiency and helps to spread costs between different types of stakeholders. Consideration could be given to further specifying successful models of multi-stakeholder collaboration rather than enumerating which stakeholders should be involved in the design and implementation of validation initiatives.
- Tailoring validation processes to specific target groups instead of a promoting a holistic ‘one-size-fits-all’ approach can be another factor of efficiency, because it generates savings in the application of validation. Consideration could be given in policy to the further promotion of tailored validation services to specific target groups, depending on their distance from the labour market or education system.

5.3 Relevance

5.3.1 Conclusions

The relevance of the objectives of the CR persists, as its objectives continue to address present socio-economic needs and concerns of stakeholders in Member States⁴⁵⁹. The CR has helped to address a need to enhance the visibility of validation in the public domain, has encouraged the development of validation initiatives to enhance both the competitiveness of the workforce, and has promoted up-skilling and lifelong learning, in particular of those with lower levels of formal educational achievement. As such, the CR objectives are perceived to be relevant to the current social context, including their focus on improving the situation of disadvantaged groups – with validation being increasingly considered, for example, to address the situation of low-skilled adults and long-term unemployed or as an aid to the socio-economic integration for newly-arrived migrants. However, it has been pointed out that the CR does not place enough emphasis on the importance of innovative

⁴⁵⁹ Evaluation sub-question 5.1.

approaches to reach disadvantaged groups, particularly considering that many individuals in these groups may have had negative experiences of assessments.

Regarding the relevance of the CR to the labour market more specifically, there is some evidence that its principles are fit for purpose in light of challenges such as the modernisation of occupations and the digitalisation of work likely to result in significant re-structuring of tasks, job-redesign and movement of individuals between occupations⁴⁶⁰. In this context, the importance of validation for economic efficiency and the transition between jobs is likely to be heightened.

The CR aims to encourage multi-stakeholder collaboration, but this may not be enough to overcome differences of opinion among different stakeholder types as to what purpose validation should serve and this can inhibit their fruitful collaboration. For instance, employers and labour market stakeholders will only have an interest in validation if it offers a guarantee of one's proficiency and employability while other stakeholders may attach more importance to the social inclusion aspects of validation. Therefore, the relevance of the CR may vary depending on the perspectives of different types of stakeholders.

The measures outlined in the CR continue to be relevant to achieve its set objectives⁴⁶¹. The CR's principle regarding the establishment of links between validation and NQF/EQF is highly relevant given the importance of non-formal and informal learning for the acquisition of new skills over one's lifetime that can be converted into qualifications to meet new demands in the labour market. It is therefore important that NQFs are up to speed with new occupational standards on the labour market to ensure continued relevance of linking validation to NQFs. In addition, the alignment of NQFs to the EQF is relevant to the aim of greater intra-EU mobility as the learning validated in a different country to that where the individual lives could be recognised by a qualification covered by the NQF of that other country – and, through the EQF then also in the country of residence of the applicant – where (s)he may want to continue studying or working.

The evaluation has also shown further divergences on the more technical elements of validation in the context of the implementation of the CR. This does not require the definition of a single model for validation, but rather an in-depth analysis of different models and an appraisal of their relative strengths and weaknesses, for example:

- The extent to which the four stages of validation are universally relevant to all users: A particularly important aspect is assessment, linked to the issues of recognition and stakeholder trust and, together with certification, the most recurrently used stage in national VNFIL initiatives. How to balance⁴⁶² formative (sometimes called assessment for learning, in which feedback tends to play a key part⁴⁶³) and summative assessment (sometimes called assessment of

⁴⁶⁰ Arntz, M., Gregory, T. and Zierahn, U. (2016) 'The risk of automation for jobs in OECD countries' OECD, Paris. Brown, P., Lloyd, C. and Souto-Otero, M. (2018) 'The prospects for skills and employment in an era of digital disruption: a cautionary note' SKOPE Working Paper 127, University of Oxford.

⁴⁶¹ Evaluation sub-question 5.2.

⁴⁶² On the differences and commonalities between formative and summative forms of assessment see Harlen, W. and James, M., (1997) Assessment and learning: differences and relationships between formative and summative assessment. *Assessment in Education: Principles, Policy & Practice*, 4(3), pp.365-379. Crisp, G.T. (2012) 'Integrative assessment: reframing assessment practice for current and future learning' *Assessment & Evaluation in Higher Education*, 37(1), pp.33-43.

⁴⁶³ Progress in the use of this type of assessment in formal education across countries has been uneven. See Birenbaum, M., DeLuca, C., Earl, L., Heritage, M., Klenowski, V., Looney, A., Smith, K., Timperley, H., Volante, L. and Wyatt-Smith, C., (2015) International trends in the implementation of assessment for learning: Implications for policy and practice. *Policy Futures in Education*, 13(1), pp.117-140.

learning) in validation processes⁴⁶⁴, the use of innovative forms of assessment for learning, authentic assessment⁴⁶⁵, or the processes and stakeholder engagement to set up and work with standards and learning outcomes, for example, could receive greater attention in the work following up from the CR.

- The relevance of having the same standards in VNFIL as in formal education (especially when certain sectors may value occupational experience more than formal qualifications): there has been a broadening in the conception of the skills that should be assessed, for example, in the context of International Large Scale Assessments (such as PISA's development from an exclusive focus on cognitive skills to also encompass non-cognitive, socio-emotional skills including collaboration, task performance or emotional regulation⁴⁶⁶), which shows an increasing interest in knowledge, skills and competences that are likely to be acquired in good part outside of the formal education system. Real work offers clear opportunities for valid assessment⁴⁶⁷ and assessment that is more holistic than mainstream forms of assessment in formal education, such as tests and examinations.

The perceived usefulness of EU transparency tools such as the Europass CV or Youthpass in validation processes: there needs to be further work on finding ways of giving visibility to skills acquired outside the formal education system, especially transversal skills, not least to facilitate intra-EU mobility for work or studies through validation

With regards to governance and support structures, the EQF advisory group and the organisation of peer-learning activities have been relevant and have contributed to the achievement of the objectives of the CR⁴⁶⁸. However, as noted, support structures for the CR have been less intense than for some other EU initiatives in related areas. In relation to validation, a full OMC process is not in place, because even though there are exchanges of good practice, indicators to measure progress have not been formally defined and periodic formal reporting on progress has not been agreed. This also makes benchmarking challenging.

5.3.2 Lessons learned

In light of the current changes in the labour market, brought about by digitalisation and automation, the importance of validation for economic efficiency and the transition between jobs could be heightened. This is a factor that underlines the relevance of continuing support for the development of validation systems.

A view expressed by some stakeholders is that the CR does not address sufficiently the needs for support for social and economic integration of certain disadvantaged groups who require broader interventions across a range of policy fields. In this respect, it would be advantageous to place greater emphasis on the integration of validation measures with other support measures, across a range of policy fields, required by these groups.

⁴⁶⁴ See also European Commission, CEDEFOP and ICF (2014) 'European Inventory on validation of non-formal and informal learning: Thematic report: validation methods.'; Souto-Otero, M. (2016) 'Validation of non-formal and informal learning in Europe: research, policies, legitimacy and survival' in Bohlinger, S., Dang, K. A. and Klatt, G. (eds.) *Education Policy*. Peter Lang.

⁴⁶⁵ Darling-Hammond, L. and Snyder, J., (2000) 'Authentic assessment of teaching in context' *Teaching and teacher education*, 16(5-6), pp.523-545.

⁴⁶⁶ See <http://www.oecd.org/education/cefi/social-emotional-skills-study/>

⁴⁶⁷ Vaughan, K., and Cameron, M. (2010). *A guide to good practice in industry training organisation structures and systems for on-job assessment*. Wellington, New Zealand: New Zealand Council for Educational Research.

⁴⁶⁸ Evaluation sub-question 5.3.

Member States with advanced validation arrangements have overall been less prompt to take action on the CR. This is likely to be associated with the nature of the measures outlined in it. Future initiatives could ensure that the measures put forward seek effects across a wider set of countries, including those with advanced validation arrangements.

Further work would also be beneficial in terms of deepening the exchange of experiences on the technical elements of validation and further exploring the international dimension of validation as described above in this section. Moreover, the relevance of governance and support structures could also be enhanced, incorporating a fuller OMC process in validation. New monitoring tools or existing tools such as the European Inventory could be used to provide the bases for country-specific recommendations in validation, for example.

5.4 Coherence

5.4.1 Conclusions

The evaluation analysed the internal coherence of CR measures as well as their coherence with other European initiatives and with national policies.

First-hand evidence gathered for this study shows that there is overall agreement that the measures outlined in the CR are coherent with one another. The CR is also coherent with other European policies and initiatives (more generally and in the area of validation specifically), transparency tools and financing instruments, although there are several areas that would benefit from further development.

The CR is thematically and conceptually coherent with EU policies across a range of areas: education and training, employment, career guidance (e.g. the New Skills Agenda and the Upskilling Pathways Recommendation) and explicit links to a number of EU-level instruments: (e.g. EQF, credit systems, transparency tools, and quality assurance frameworks). However, coherence in practical or organisational terms was found lacking, due to lack of implementation of EU policies or instruments at the national level.

The CR is also coherent with the shift to learning outcomes that the EU has been promoting over the last decade, and its work on the EQF and NQFs, as already noted. These are preconditions for the good functioning of validation: learning outcomes approach facilitates the recognition of non-formal and informal learning in formal education systems, for example, and this recognition is then extended to other EU countries through the EQF. This, in turn, facilitates more individualised and age-neutral learning pathways and the opening up of formal education systems. Validation, on the other hand, is required to give full meaning, in practice, to those developments.

The coherence between the CR and EU transparency tools could be further clarified. While there is a recognition of the existence of potential synergies between them, stakeholders often reported to require further guidance on how those could be materialised in practice. The new version of Europass and its online platform (operational from Spring 2020) may address this issue.

The multiplicity of EU credit systems (e.g. ECVET, ECTS) and quality assurance frameworks (e.g. EQAVET, ESG) in education and training appears to have led to a situation in many Member States where there is uncertainty as to how best combine their application to improve the development, accessibility and transparency of validation arrangements across the EU.

Coherence between the CR and national validation policies was reported in most Member States. In some cases, the CR and national-level policies have mutually reinforced each other in the implementation process. In a clear example of coherence,

national policies in some countries have been explicitly created or updated based on the CR. This has taken place with regards to national validation policies, but also – in some cases – with regards to other strategies and legislation related to broader lifelong learning policies. Significant progress in the development of NQFs since 2012 in various Member States has also been coherent with the CR. There is evidence that the 2016 Upskilling Pathways has inspired national-level validation initiatives for the low-qualified and low-skilled that are coherent with the principles of the CR. An identified shortcoming with regards to coherence is the lack of adoption of the comprehensive approach to validation put forward in the CR, which may be due to the fact that the various EU policies and instruments relating to validation are seen as not sufficiently joined up.

5.4.2 Lessons learned

Coherence between the CR and EU financing instruments could be further enhanced by exploring possibilities for the internationalisation of validation, as described in more detail in the section on relevance.

There are clear complementarities between the CR and the European Guidelines for VNFIL, as well as the European Inventory on Validation. However, at various points in the evaluation it was clear that that it would be beneficial to undertake further actions explaining how the Guidelines and the CR can be used to complement each other in supporting the development of lifelong learning systems.

The CR could address more explicitly issues related to the clarification of the strengths and weaknesses of different tools to be employed for the identification, documentation and assessment of learning, which is a key theme for the success of validation systems and would further enhance its coherence with the European Guidelines.

A similar conclusion can be reached with regards to the CR's coherence with transparency tools. While various stakeholders noted the existence of potential synergies between the CR and such tools, they often reported a need for further guidance on how those could be materialised in practice and suggested that further support was required in this respect.

There may therefore be scope for a future EU-level intervention bringing together the principles of the CR and those of related EU initiatives (e.g. Upskilling Pathways etc.), to facilitate synergies between the policy areas of validation, labour market activation and lifelong learning on the one hand, and to contribute more effectively towards the wider EU objective of achieving sustainable economic growth and inclusive societies.

5.5 EU added value

5.5.1 Conclusions

The CR has provided EU added value thanks to the exchanges of good practices that it has promoted and in the identification of a common set of principles that should guide the strategic direction of national validation systems.

The CR appears to have generated the greatest volume effects in Member States where validation registered a lower level of activity prior to 2012; in those countries it is unlikely that national policies alone would have developed validation systems to the same extent without EU intervention. In certain Member States, with more advanced validation systems, the CR has given validation some visibility and strategic direction feeding into discussions on policy initiatives. EU funding support strengthened implementation efforts at the national level by providing additional capacity for the development of VNFIL systems and processes related to the CR.

The CR has had some scope effects in that it has contributed to the development of a more widely shared understanding of and approach to validation at EU level. There is

evidence from several countries that the validation approach set out in the CR is contributing to the modernisation of policies related to validation, particularly in the area of career guidance.

However, the CR has rarely led to profound legislative changes at the national level. As a result, Member States' validation systems have kept their specificities and remain fairly differentiated. This can be explained by national differences in perception as to the purpose and usefulness of validation in addressing priorities of a social or economic order, something that was already acknowledged in the design of the CR. The CR was indeed designed to be sensitive to the existence of national circumstances and specificities, which justifies the existence of differences in validation arrangements from one country to another.

5.5.2 Lessons learned

Given the current and future trends shaping the world of work, validation can be expected to be an increasingly important component of lifelong learning and professional development.

This alone justifies continued EU policy action in the field of validation, to drive national-level actions to improve its availability and to encourage its use across other policy areas or measures dedicated to the sustainable integration of individuals in the labour market.

5.6 Evaluation and monitoring needs: lessons learned

Several lessons in relation to evaluation and to monitoring needs were identified during the evaluation process. First, the evaluation has been able to benefit from monitoring work provided by the European Inventory on Validation. The longitudinal nature of this project has been particularly useful for the evaluation, as it has aided the construction of the baseline for the project. On the other hand, the match between the information collected in the Inventory and the principles covered in the CR, could have been stronger, particularly in the editions closer to 2012. The timing of the Inventory could also have better corresponded with the timing of the CR.

Data on access to validation measures, suffers from a widespread lack of centralised and standardised data. The lack of robust evidence on the degree of efficiency of implementation of the CR points to the benefits that a more systematic and coordinated exchange of information actions at EU level would bring – in particular on the number of individuals benefitting from validation (participation, outcomes achieved, success rates, characteristics of participants, etc.), the costs of validation measures across the Member States, and on factors affecting the efficiency of spending in validation measures.

Given the collaboration with the EQF Advisory Group in the monitoring of progress, the implications of the reduced intensity of meetings of the EQF Advisory Group for validation require consideration.

Glossary

- AE: Adult Education
- AT: Austria
- BE: Belgium
- BE-fr: French-speaking Belgium (Brussels-Wallonia)
- BE-nl: Dutch-speaking Belgium (Flanders)
- BG: Bulgaria
- CBQ: Competence-Based Qualification
- CR: Council Recommendation (of 2012 on the Validation of Non-Formal and Informal Learning)
- CVET: Continuous Vocational Education and Training
- CY: Cyprus
- CZ: Czech Republic
- DE: Germany
- DK: Denmark
- ECTS: European Credit Transfer and accumulation System
- ECVET: European Credit system for Vocational Education and Training
- EE: Estonia
- EL: Greece
- EQAVET: European Quality Assurance in Vocational Education and Training
- EQF: European Qualification Framework
- EQF AG: EQF Advisory Group
- ES: Spain
- ESCO: European Skills, Competences, Qualifications and Occupations
- ESF: European Social Fund
- ET (2020): Education and Training (2020 EU strategic framework)
- FI: Finland
- FR: France
- GE: General Education
- HE: Higher Education
- HEI: Higher Education Institution
- HR: Croatia
- HU: Hungary
- HVET: Higher Vocational Education and Training
- IAG: Information and Guidance
- IE: Ireland
- IQS: Integrated Qualification System

- IT: Italy
- IVET: Initial Vocational Education and Training
- KII: Key Informant Interview
- KSC: Key Skills and Competences
- LLL: Lifelong Learning
- LM: Labour Market
- LT: Lithuania
- LTU: Long-term unemployed
- LU: Luxembourg
- LV: Latvia
- MS: Member State (of the European Union)
- MT: Malta
- NEET: Not in Employment, Education or Training
- NFIL: Non-Formal and Informal Learning
- NL: Netherlands
- NQF: National Qualification Framework
- OMC: Open Method(s) of Coordination
- OPC: Open Public Consultation
- PES: Public Employment Services
- PL: Poland
- PT: Portugal
- QA: Quality Assurance
- QAF: Quality Assurance Framework
- RO: Romania
- RPL: Recognition of Prior Learning
- RVCC: Recognition, Validation and Certification of Competences
- SE: Sweden
- SI: Slovenia
- SK: Slovakia
- TOR: Terms of Reference
- TS: Third Sector
- UP: Upskilling Pathways initiative
- UK: United Kingdom
- VET: Vocational Education and Training
- VNFIL: Validation of Non-Formal and Informal Learning
- VPL: Validation of Prior Learning

Annexes

Annex 1 SYNOPSIS REPORT ON STAKEHOLDER CONSULTATION ACTIVITIES

In accordance with the Better Regulation Guidelines, this Annex provides a synopsis or summary of all the consultation activities conducted as part of this evaluation study.

Three stakeholder consultation activities were carried out for this assignment.

- Key Informant Interviews (KIIs)
- Expert group meetings
- Open Public Consultation (OPC)

A1.1 Key informant interviews (KIIs)

Field research for this assignment began with KIIs across all EU28 Member States and at EU level.

The stakeholders that were prioritised included:

- National EQF Validation representatives, who may be from ministries or government executive agencies
- Ministries and other policymaking bodies in charge of VNFIL (stakeholders not represented on the EQF advisory board)
- National organisations specialised in validation-relevant issues such as career guidance and labour market activation (e.g. PES, but also youth organisations)
- National authorities for qualifications and certifications (usually responsible for NQFs)
- National education and training institutions providing VNFIL
- EU or international organisations active in VNFIL (e.g. EU youth organisations)

The study team has aimed to conduct at least 60 KIIs in total: between two and four KIIs per Member State as well as between five and ten KIIs with EU or international organisations.

In total, 72 KIIs were conducted. In some Member States, no KIIs could be conducted (DK, LV) while in several others fewer than two were completed (EE, LT, RO, UK). This was mostly due to lack of responsiveness or lack of detailed knowledge of the CR among some of the targeted stakeholders.

Table A1.1 Number of KIIs completed by Member State and at EU level

Member State	No. of KIIs completed	Member State	No. of KIIs completed
Austria	2	Italy	4
Belgium	3	Latvia	0
Bulgaria	2	Lithuania	1
Croatia	3	Luxembourg	2
Cyprus	3	Malta	2
Czech Republic	3	Netherlands	4
Denmark	0	Poland	3
Estonia	1	Portugal	3

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Member State	No. of KIIs completed	Member State	No. of KIIs completed
Finland	3	Romania	1
France	3	Slovakia	2
Germany	2	Slovenia	2
Greece	4	Spain	2
Hungary	2	Sweden	4
Ireland	5	United Kingdom	1
Number of EU-level KIIs completed			5
Total number of KIIs completed			72

The following table shows the type of stakeholders taking part in the KIIs for this evaluation study. Representatives of education ministries in the Member States most frequently took part in the KIIs, followed by national VET agencies and qualification authorities. Across these three stakeholder groups, half of the EQF AG members were interviewed.

Table A1.2 Overview of KIIs completed by stakeholder type

Stakeholder type	No. of KIIs completed	
Ministry of education representatives	21	No. of KIIs with 14 EQF AG members
National VET agency representatives	12	
Qualification authority representatives	11	
VNFIL organisation representatives	8	
HEI and academia representatives	8	
Chambers of commerce and crafts representatives	4	
Labour market agency representatives	2	
Ministry of labour representatives	1	
EU umbrella organisation representatives	5	
Total	72	

Below is the topic guide that was used to collect information from the KIIs. This topic guide was tailored to specific key informants depending on the organisation they represented and their level of knowledge.

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Table A1.3 Topic guide for KIIs

Question	EQF/valida tion reps.	Ministries in charge of VNFIL and NQF authorities	PES and other career guidance specialists	VNFIL providers	EU/Interna tional organisatio ns
<i>Effectiveness</i>					
1. How would you describe the progress regarding availability and accessibility of validation procedures since the adoption of the Recommendation in 2012?	✓	✓	✓		✓
2. To what extent are processes for validating informal and non-formal learning comprehensive (include the "four steps" of the Recommendation)?	✓			✓	✓
3. To what extent are these processes comprehensive in terms of educational and occupational sector coverage?	✓	✓	✓		
4. To what extent is validation accepted as a route to achieve a full or partial formal qualification or credits towards it?	✓	✓	✓	✓	✓
5. To what extent are there synergies existing between validation arrangements and credit systems applicable in the formal education and training system? Are validation arrangements linked to NQF and to EQF?	✓	✓		✓	
6. Have validation arrangements increasingly targeted disadvantaged groups since the adoption of the Recommendation in 2012?	✓	✓			✓
7. To what extent is information and guidance (IAG) available on the process, assessment and outcomes of validation? How has that evolved since the adoption of the Recommendation?	✓		✓	✓	
8. To what extent is guidance and counselling available during validation processes? Do you see any evolution since the adoption of the Council Recommendation?	✓		✓	✓	
9. What processes are in place for quality assurance of validation?	✓	✓		✓	

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Question	EQF/valida tion reps.	Ministries in charge of VNFIL and NQF authorities	PES and other career guidance specialists	VNFIL providers	EU/Interna tional organisatio ns
How has this developed since 2012?					
10. To what extent are quality assurance systems transparent and ensure reliable and credible results are produced?	✓	✓		✓	
11. To what extent are the qualifications and other outcomes obtained through validation equivalent to those obtained through formal education, and have the same value in the education system and the labour market?		✓	✓	✓	
12. Are European Transparency tools used appropriately to document the learning outcomes of validation (e.g. Europass)? If so, do you see any evolution since the adoption of the Recommendation?	✓		✓	✓	
13. Is there any evidence that the Recommendation has led to an increasing number of individuals making use of validation to improve their professional prospects? (I.e. to seek (better) employment or to undertake further education or training)	✓	✓	✓	✓	
14. Is there any evidence on trends regarding take-up of validation initiatives and on the evolution of outcomes at any point since 2012? Are these trends linked to the Recommendation's related actions (if so, in what ways)?	✓	✓	✓	✓	
<i>Efficiency</i>					
15. Are the costs of implementing the Recommendation commensurate with the development of validation arrangements and the level of validation activity reported?	✓	✓	✓		✓
16. Are the costs of implementing the Recommendation fairly spread between different relevant stakeholders: public bodies, educational institutions, employers, third sector organisations and individual end-beneficiaries?	✓				

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Question	EQF/valida tion reps.	Ministries in charge of VNFIL and NQF authorities	PES and other career guidance specialists	VNFIL providers	EU/Interna tional organisations
17. Do the benefits of validation actions to individuals, the economy and society exceed the costs of their implementation? Can you point to any evidence or data for this?		✓	✓		✓
<i>Relevance</i>					
18. Do you think the objectives of the Recommendation remain relevant in the current policy context and address current needs (in your country)?	✓	✓	✓		
19. Do you think the Recommendations is responsive to the needs of the different types of stakeholders it involves, and most importantly, to individuals benefitting from validation practices	✓	✓	✓	✓	✓
20. To what extent are EU actions (reporting, guidelines, inventory, etc.) helpful guiding your actions on validation in line with the Recommendation? Any room for improvement?		✓			
<i>Coherence</i>					
21. Do you see synergies and/or overlaps of the Recommendations with other related European policy initiatives and instruments (e.g. ECVET, EQAVET)?	✓	✓			✓
22. Has the Recommendation led to an improved common understanding of what VNFIL and entails across the Member States? Has there been a move towards more comparable systems across the Member States? If yes, in what ways/ areas? If not, why not?	✓	✓			✓
<i>EU Added value</i>					
23. Do you think that Members States could have achieved the objectives and intended results of the Recommendation on their own to the same extent without EU intervention?	✓	✓			✓

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Question	EQF/valida tion reps.	Ministries in charge of VNFIL and NQF authorities	PES and other career guidance specialists	VNFIL providers	EU/Interna tional organisatio ns
24. Has the Recommendation influenced policy in areas related to VNFIL such as career guidance, training, skills auditing?	✓	✓	✓		
25. Do you think the issues outlined in the Council Recommendation still benefit from EU level action in the current organisational, technological, labour market and social context?	✓	✓	✓		
Total number of set questions per stakeholder group	22	20	15	12	10

A1.2 Expert group meetings

Two Expert group meetings were held in Brussels to enable a reflection on the evaluation's interim findings and to facilitate the exchange of experiences and observations among stakeholders the implementation of the CR (in different Member States and the EU) and on the topic of validation more generally.

The two thematic meetings held were as follows:

The role of employers and other labour market actors in validation arrangements	Wednesday 13 November 2019
How validation arrangements relate to national qualification frameworks (NQFs) and the shift to learning outcomes and flexible learning pathways	Thursday 14 November 2019

Ten countries were represented (BE-Fr, CZ, ES, IE, IT, MT, PL, SE, SK and Norway), with the following breakdown of national-level stakeholders: two from national ministries, two from national institutions for education and training, two from regional-level labour organisations, three from an organisation in charge of validation, two from training and academic institutions, one from a business organisation. Stakeholders from 3 EU umbrella organisations and from two EU institutions were also represented.

Below is a summary of the **key messages** from the Expert group meetings.

The role of employers and other labour market actors in validation arrangements	<ul style="list-style-type: none"> • The CR is effective and relevant in helping Member States conceptualise validation and in creating momentum for multi-stakeholder collaboration involving employers and labour market actors. • The CR has generated considerable added value in those Member States where validation is still in its early stages of development. • Limited evidence overall as to whether the CR has enabled people to use their validation outcomes for entering the labour market and progressing within it.
How validation arrangements relate to national qualification frameworks (NQFs) and the shift to learning outcomes and flexible learning pathways	<ul style="list-style-type: none"> • The CR has helped establish learning outcomes (knowledge/skills/competences) as a 'currency' for validation across the EU. • The intended objectives of the CR are restrained by the fragmentation of validation processes observed in many countries, compounded by the lack of a common vision among different stakeholder types in some cases. • While the CR has helped shape a more common understanding of validation across the EU, there is very limited evidence of validation outcomes being used for intra-EU mobility purposes.

Overall conclusions

- The CR is regarded as having continuously fed into discussions on validation in many Member States and has been used as for developing validation processes in those countries where they were mostly inexistent prior to 2012.
- Validation cannot operate separately and needs to be embedded in wider skills and lifelong learning strategies, which requires institutional change to facilitate multi-stakeholder collaboration.
- It may still be too early to assess the extent to which the CR and other relevant EU-level instruments can be applied to improve links between validation and formal education systems, to develop flexible learning options as a gateway to validation and to facilitate EU mobility.
- Validation does have a bright future as it can be expected that skills will increasingly require updating to remain relevant to the rapid evolutions of the labour market.

The full report on the Expert group meetings is available from Annex 2.

A1.3 Open Public Consultation (OPC)

The Open Public Consultation (OPC) has served to gather views on the Council Recommendation from the wider community of experts and practitioners on VNFIL on the one hand, and from people who have undergone a VNFIL process or who would benefit from VNFIL on the other (i.e. end beneficiaries⁴⁶⁹). Certain questions were therefore only targeted at organisations with knowledge of VNFIL while some others were specifically targeted at individual end-users of VNFIL.

Following its translation into 22 other European languages, the OPC was launched on 7 August 2019 and closed on 13 November 2019. It was disseminated to the relevant networks of DG EMPL with the targeted networks having been requested to disseminate the OPC to their respective beneficiaries and partners.

National ministry stakeholders taking part in the KIIs have also been asked to disseminate the OPC to their relevant networks, while national-level VNFIL and career guidance organisations have been encouraged to do likewise with their beneficiaries.

A **summary of the results** of the OPC is presented here. The analysis covers all responses submitted between 7 August and 13 November 2019.

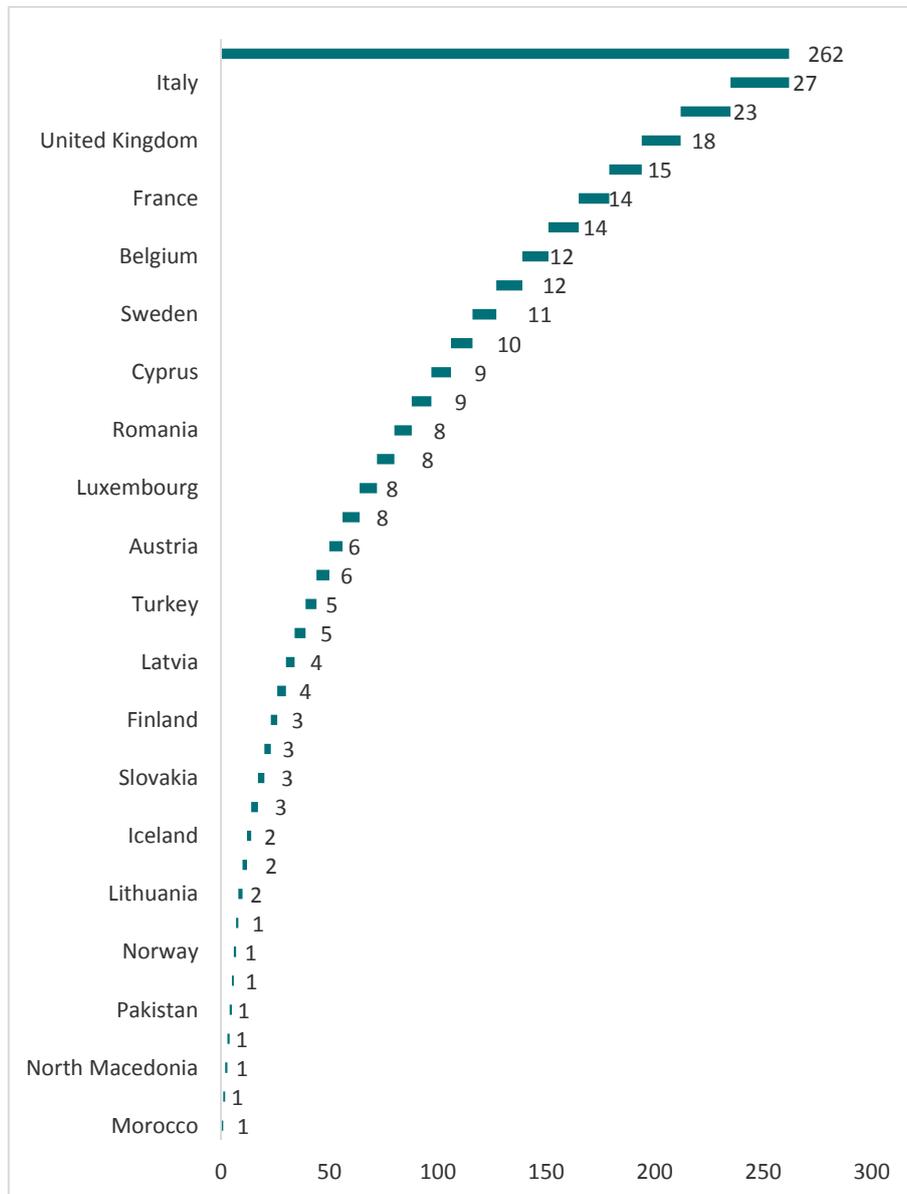
The OPC generated a total of **262 responses**. In addition, **ten organisations submitted a position paper** together with their OPC responses: seven at the national-level and three at the EU-level.

⁴⁶⁹ Particularly among socio-economically disadvantaged groups: e.g. such as individuals who are unemployed or at risk of unemployment or who are low-qualified

Study supporting the evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning

Respondents from Italy were most numerous with 27 responses (10%), followed by 23 participants (9%) from Portugal, and 18 responses (7%) from the United Kingdom. Importantly, response was received from each EU Member State.

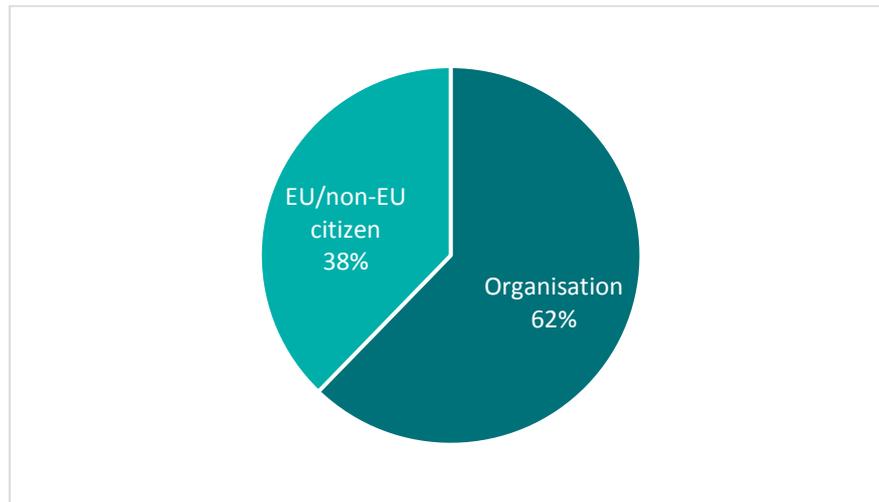
Figure A1.1 Overview of responses by country



N=262, Source: OPC results

In terms of participant type, the 262 responses split unevenly between organisations (163 responses or 62%) and EU/non-EU citizens (99 responses or 38%). This sample size provides a good basis for analysis as both groups are sufficiently represented, whilst it also allows for further segmentation by type of organisation.

Figure A1.2 Overview by participant type



N=262, source: OPC results

When analysing the type of organisations in the sample, public authorities are most prevalent (44 responses), followed by NGOs (38 responses) and academic/research institutions (31 responses).

Table A1.4 Type of organisations in the sample

Type of organisation	No. of responses
Academic/research institution	31
Non-governmental organisation (NGO)	38
Public authority	44
Other	26
Company/business organisation	11
Business association	6
Trade union	7
Total	163

N=163, Source: OPC results

The **key OPC findings** can be summarised as follows:

- Nearly three out of four respondents thought there are possibilities for people in their respective country to undertake VNFIL
- 77% respondents agreed people should be able to have their NFIL validated in all cases with a further 21% in some cases only
- 60% of the responding organisations believed that the CR contributed to make validation more available to people
- 63% of the respondents who had undertaken validation recently indicated receiving either a full or a partial qualification.

The full results and full analysis are available from Annex 3.

Annex 2 REPORT ON THE EXPERT GROUP MEETINGS

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Introduction

As part of the study supporting the evaluation of the 2012 Council Recommendation on the validation of non-formal and informal learning (hereafter CR), two expert group meetings were held in Brussels on 13 and 14 November 2019, each covering the topic of validation from a specific thematic angle.

- The role of employers and other labour market actors in validation arrangements (Wednesday 13 November 2019)
- How validation relates to NQF and the shift to learning outcomes and flexible learning pathways (Thursday 14 November 2019)

Various Member State-level and EU-level organisations were represented. The stakeholders who attended are listed in the table below:

Name	Organisation	Country	Meeting(s) attended
Jan Bruha	National Institute of Education	Czechia	13-14 November
Ildiko Pathoova	Ministry of Education, Science, Research	Slovakia	13-14 November
Alain Kock	Consortium de Validation des Compétences	Belgium-FR	13-14 November
Severine Deneubourg	Consortium de Validation des Compétences	Belgium-FR	13 November
Deirdre Keeley	Cork Institute of Technology	Ireland	13 November
Enrico Bressan	Fondazione Centro Produttività Veneto	Italy	13 November
Tormod Skjerve	Virke - The Federation of Norwegian Enterprises	Norway	13 November
Małgorzata Dudziak	Provincial Labour Office in Krakow	Poland	13 November
Julio Mariano Carballo	Ministry of Education and Vocational Training	Spain	13 November
Anna Kahlson	National Agency for VET	Sweden	13 November
Judit Lantai	European Youth Forum	EU	13 November
Capucine Anbergen	Consortium de Validation des Compétences	Belgium-FR	14 November
Suzanne Gatt	University of Malta	Malta	14 November
Alfonso Aliberti	European Youth Forum	EU	14 November
Francesca Operti	European Association for the Education of Adults	EU	14 November
Carlo Scatoli	DG Employment, Social Affairs and Inclusion	EU	13-14 November
Martina Ni Cheallaigh	DG Employment, Social Affairs and Inclusion	EU	13-14 November
Ernesto Villalba	Cedefop	EU	13-14 November
Koeno Nomden	DG Employment, Social Affairs and Inclusion	EU	13-14 November

These meetings enabled EU and national-level stakeholders and experts to share their experiences on validation and to provide insights on the effects of the CR in this respect. They served as a source of information for this evaluation study, with the aim of complementing and verifying the information obtained from the desk research, stakeholder interviews and the online open public consultation.

Description of the themes and questions covered

For both meetings, the participating stakeholders addressed a set of thematic questions and as well as several questions linked to the criteria of the evaluation study.

- The first Expert group meeting on the role of employers and labour market actors in validation had a focus on questions relating to the **effectiveness** and **relevance** of the CR in improving the availability of validation services and their accessibility.

- The second Expert group meeting on the link between validation and NQF and the shift to flexible learning (pathways/outcomes) had a focus on questions relating to the **effectiveness** of the CR in linking validation to national qualification standards and to its **coherence** with other relevant EU instruments to achieve better comparability between national validation systems across the EU.
- In both meetings, discussions also addressed questions relating to the **added value** of the CR (as an EU-level intervention) from a national perspective in the area of validation.

An overview of the questions addressed in each of the expert group meetings is provided in the table below.

The role of employers and other labour market actors in validation – 13 November	How validation relates to NQF and the shift to flexible learning – 14 November
<p><i>Discussion 1: Involvement of employers/labour market (LM) actors in the design of national validation strategies</i></p> <ul style="list-style-type: none"> • To what extent are employers/LM actors able to support the development of validation in accordance with the objective and principles of the CR? • To what extent does the CR give employers/LM actors a role in developing validation? <p><i>Discussion 2: Role of employers/labour market actors in improving visibility of validation and promoting its use</i></p> <ul style="list-style-type: none"> • To what extent are employers/LM actors able and willing to promote the use of validation and improve its visibility as a result of the CR? • To what extent does CR offer efficient solutions for improving the visibility of validation and promoting its use? 	<p><i>Discussion 1: Links between validation and NQFs – outcomes of the validation process and their recognition</i></p> <ul style="list-style-type: none"> • To what extent are there synergies in place between validation and NQFs (EQF) in the education/training area, labour market area and third sector • To what extent does validation lead to qualifications according to a recognised standard <p><i>Discussion 2: How is validation relevant to the shift to flexible learning pathways and outcomes approach</i></p> <ul style="list-style-type: none"> • To what extent is the CR coherent with EU instruments and initiatives to achieve flexible learning pathways

The role of employers and other labour market actors in validation – 13 November	How validation relates to NQF and the shift to flexible learning – 14 November
<p>In summary</p> <p>To what extent has the CR contributed to:</p> <ul style="list-style-type: none"> • Providing citizens with greater opportunities for validation of their non-formal or informal learning? • Enabling citizens to use their validation outcomes to enter and move within the (EU) labour market? <p><i>Would the same results have been achieved by the MS alone (without this CR)?</i></p> <p><i>Does this issue continue to require action at EU level?</i></p>	<p>In summary</p> <p>To what extent has the CR contributed to:</p> <ul style="list-style-type: none"> • Providing citizens with opportunities to use validation to work and learn across Europe? • Enabling citizens to engage in lifelong learning/flexible learning? <p><i>To what extent do you observe comparability across the MS in this regard thanks to the CR?</i></p>

Discussion points

A2.1 The role of employers and other labour market actors in validation arrangements

A2.1.1 Involvement of employers and other labour market actors in the design of national validation strategies

The starting point for these discussions was the importance given in the CR to the involvement of employers, social partners and wider labour market actors in the development and implementation of validation arrangements, in line with the objectives and principles of the CR.

Influence of the CR: experiences and observations at the national level

Considerable differences were revealed regarding the involvement of employers and labour market actors in the design and implementation of validation strategies at the national level, which made it difficult to appraise the extent to which the CR has had any systemic influence on the involvement of these stakeholders in policymaking.

In **French-speaking Belgium** (Brussels-Wallonia), **the CR was reported to have had a legal influence on multi-stakeholder collaboration arrangements**. The CVDC⁴⁷⁰ has intensified collaboration between social partners, education and training providers, PES and other labour market actors to develop validation methodologies, including for disadvantaged groups. From this collaboration, a vade-mecum guide on the tailoring of validation services to specific disadvantaged groups was produced.

Italy is another country where the **CR has had direct influence on the design of validation arrangements**; the national legal framework does refer to the CR explicitly. The Italian validation system has a strong labour market dimension with PES playing a central role and are given scope to collaborate with employers and other labour market actors. However, the validation system is strongly regionalised, which means the extent of such collaboration

⁴⁷⁰ Consortium de Validation des Compétences

will vary according to the region. In addition, there are still too few opportunities for validation due to a lack of PES staff and resources.

Like Italy, **Spain** has a strong regional framework for validation offering scope for the involvement of employers and labour market actors with regional authorities, which can be supported through public funding. Spanish legislation provides for social partners to directly take part in the design of validation policies. Nevertheless, it is not possible to attribute this to the CR.

For countries with validation systems already established before 2012, it was reported that the **CR served mainly as a source of inspiration for continued collaboration** between policy stakeholders, formal education and training institutions, and labour market actors in the area of validation.

- In **Czechia**, validation is almost exclusively driven by the labour market while the system predates the 2012 CR. While the CR has not influenced validation arrangements, it has helped ensure continuity of attention to validation as a topic at the national level.
- In **Ireland**, the CR has put validation on the discussion table but without influencing legislation on the matter. There is otherwise collaboration between the national network of validation practitioners and sector organisation, but it is not possible to ascertain if this has been influenced by the CR as there is no public funding for implementing it. The economic crisis nevertheless led to the intensification of validation services after the introduction of the CR in 2012. Some Irish employers were reported to use validation as a mechanism to retain staff.
- In **Sweden**, sector organisations and the wider business community are the main organisers and providers of validation. The CR has however enabled continuous dialogue among different stakeholders: the Swedish government had proposed a new validation definition based on the four-stage approach of the CR, arguing that anything less than the four stages cannot be considered as validation. This was met with opposition, mainly from sector organisations who disagreed with this definition and the proposal was subsequently abandoned.

The **CR was reported to have had a structuring effect in Slovakia and Poland** where validation is still a 'work in progress'.

- In **Slovakia**, the CR is useful for conceptualising validation arrangements even though they remain quite limited. PES provide since 2013 skills audits after which candidates can undergo training before moving on to validation – very few individuals apply for validation without undergoing the necessary training.
- The CR has also helped with the conceptualisation of validation in **Poland** where PES now provide skills audits as part of a project to detect those candidates who have some potential for validation.

Despite these developments, it remains difficult to appraise whether the CR has facilitated the involvement of employers and labour market actors in the design and offer of validation services in both Slovakia and Poland.

Opportunities and challenges

It was suggested that input from the business community in the design of validation systems will become increasingly important for updating formal qualifications and ensuring their continuous relevance to a rapidly changing labour market. Validation can be used to update qualifications frameworks by including non-formal qualifications and industry standards into the NQFs.

On the other hand, several participants mentioned the existence of tensions between employers or industry stakeholders and formal education institutions around the definition of

skills and qualifications standards (e.g. in the ICT sector where professional standards are deemed higher than formal ones). Yet, it is formal education institutions who are empowered to define these standards in public policy. Such tensions can act as a tension to multi-stakeholder collaboration as they possibly reveal the lack of a common vision among policymakers, formal education institutions and labour market actors as to what validation should be about.

Experience shows that developing partnerships between public policy stakeholders and the business community on validation takes time, and that the institutional traditions of different countries can restrain this type of collaboration. However, it is expected that future labour market evolutions are likely to create a need for labour market actors to inform policy on validation and related topics such as vocational training and lifelong learning.

Suggestions for improvement

It was pointed out that the CR does not specify how multi-stakeholder collaboration ought to take place, despite specifying who it should involve.

Some participants highlighted that multi-stakeholder collaboration remains too institutionalised and top-down in many countries, preventing a more proactive involvement from labour market actors.

Conversely, it was believed bottom-up collaboration would have a greater impact on the availability of validation services, as these would be designed on a needs-basis and with the right level of resources. Bottom-up collaboration would thus facilitate the involvement of the business community – including SMEs – in widening the offer of validation.

It was also highlighted that validation should not operate in isolation from the definition of skills strategies and qualification standards, as this may complicate the involvement of employers and other labour market actors. This again relates to the point that the offer of validation could be better adjusted to skills needs on the labour market.

A2.1.2 The role of employers and labour market actors in improving visibility of validation and promoting its use

The discussions for this session were based on the importance for employers and labour market actors to promote the use of validation in keeping with the objectives and principles of the CR.

Influence of the CR: experiences and observations at the national level

A recurring argument was that making a positive case to labour market actors about the benefits of validation is the best way to secure their commitment to promoting its use and to ensure validation outcomes receive acceptance from employers.

- **French-speaking Belgium** (Brussels-Wallonia) operates its validation system since 2003 based on legally binding cooperation agreements with social partners who provide orientation on the qualifications for which validation needs to be developed. **The cooperation agreement was updated in 2019 based on the CR**, giving social partners even more control over the selection of qualification standards for validation. In addition, the CVDC has for the past year been actively promoting the benefits of validation to companies providing technical and financial help to those interested in developing validation for their workforce.
- In **Sweden**, the validation system is governed by sectoral agreements but has not been influenced by the CR on a more technical level. The Swedish system naturally serves the interests of sector organisations. It has been reported that validation is now used for recruitment, and even more extensively in sectors and companies experiencing skills shortages.

- In both **Sweden** and **French-speaking Belgium** social partners along with formal education providers take part in the assessment and certification processes. This is also the case in **Spain** as a way of guaranteeing a certain level of commitment to validation among labour market actors even though validation suffers from low visibility overall.

It was however argued that **some of the principles of the CR might not always be conducive to securing the commitment of labour market actors** in promoting the use of validation. This can be explained by the **extent to which employers are willing to invest resources in supporting the identification and documentation** of skills among people (including disadvantaged groups) who may be far from the labour market. It also stems from the necessity to distinguish between low skills and low qualifications, with the low-qualified often being perceived as the best suited audience for the assessment and certification stages of validation to obtain the missing qualifications justifying their skills.

- In **Sweden**, practical experiences have shown that validation targeted at the low-skilled (especially migrants) have proved ineffective. Validation is more about detecting skilled people lacking the qualifications to prove their skills, especially when used as a recruitment strategy. Those with very low employability need above all training; otherwise there is a risk validation will earn a bad reputation among employers.
- Problems were reported in **French-speaking Belgium** regarding validation for very low-skilled jobs which for which they may not even been a standard at Level 1 or 2. Social partners have been reluctant to having qualification standards at such low levels as this would have implications for recruitment and wages.

Lastly, it was pointed out that the **effectiveness of the CR** in getting labour market actors to extend the offer of validation may have been **limited by the lack of financial resources at the national level** to develop structural capacity and to mobilise sectoral expertise in this regard. This was reported to be the case in Slovakia and Italy.

Opportunities and challenges

Besides national experiences, two key points emerged as offering just as many opportunities as challenges for securing the commitment of employers and labour market actors in promoting the use of validation:

- Financial support for building validation capacity
- Targeting the right audiences

There is considerable scope in raising the awareness of companies about the benefits of validation. Validation has great potential as a means for employers to tap into a pool of talent, to assist them in their recruitment strategies and to make the most of their existing employees' skills. As such, employers would have every reason to invest in validation.

This is also important to remedy the lack of public financing which is acting as an obstacle to the development of capacity for the provision of validation in many countries. Raising awareness of the benefits of validation, and improving its visibility by the same token, is best served through strategic collaboration between public sector institutions and the business community.

Validation can generate savings for employers; its processes are meant to uncover the extent of people's skills, which enables companies to only invest in the training necessary for them to reach a qualification standard. However, experiences have revealed that public sector institutions may not be responsive enough in terms of adjusting validation processes to the skills needs of businesses.

Employers may not see the benefits of promoting the use of validation for people with low skills and low employability as they would often fail to see any returns on their investment. Validation targeting the low skilled can also potentially contribute to a negative perception of validation outcomes among the wider business community.

Suggestions for improvement

It was suggested that greater emphasis on the concrete benefits of validation would improve the effectiveness of the CR as it would encourage public institutions to enhance their collaboration with labour market actors and to give them a platform to share their experiences from the field.

At the same time, it was argued that an effective approach to validation needs to be better tailored to specific groups and consider how employability levels and aspirations can differ on an individual basis. The four-stage approach may not be the most efficient for those people who only miss the qualifications to prove their skills.

A2.1.3 Summary: How has the CR improved the availability of validation and allowed individuals to use validation outcomes on the labour market?

The CR was deemed to have been most effective and relevant in helping Member States conceptualise validation whilst creating some momentum for multi-stakeholder collaboration involving employers and labour market actors.

In this respect, some examples were given in French-speaking Belgium and Italy as to how the CR is effectively impacting on the availability of validation services. Examples from other countries reveal that multi-stakeholder collaboration ought to be better defined to ensure labour market actors are appropriately consulted on validation.

The CR has generated considerable added value in those Member States where validation is still in its early stages of development; it provides a template for offering comprehensive validation services even though the lack of funding and capacity is reported to affect their deployment.

There is limited evidence overall as to whether the CR has enabled people to use their validation outcomes for entering the labour market and progressing within it. This suggests that greater efforts might be needed to raise awareness in society of the benefits of validation.

A2.2 How validation relates to NQFs and the shift to learning outcomes and flexible learning pathways

A2.2.1 Links between validation and NQFs – outcomes of the validation process and their recognition

The purpose of these discussions was to understand whether the CR has effectively enabled the establishment of links between validation outcomes and national qualification frameworks (NQFs) in alignment with the EQF, implying an equivalence between validation certificates and certificates from the formal education system.

Influence of the CR: experiences and observations at the national level

Overall, considerable national differences emerged which makes it **difficult to appraise the influence and impact of the CR** in this regard.

- In **Slovakia**, while progress in **linking validation to the NQF** has been slow, the **CR but also the EQF Recommendation of 2017 are reported to be driving this process**. More NFIL qualifications have been mapped into the NQF. Level 3 certificates obtained from validation will soon have equivalence to formal education qualifications. For Level 6, the introduction of a 'professional bachelor's' with equivalence to a Higher Education (HE) bachelor's degree is foreseen. The ECTS credit system is used for HE but there is no credit system for VET.
- In **Czechia**, the validation system in place since 2006 has not been influenced by the CR. There is no NQF per se however NFIL qualifications correspond to EQF Levels 2-7. Validation law is separated from education and training laws. While there are plans to review the validation policy framework to extend it to adult education (non-formal

learning) in light of the CR and CEDEFOP's Validation Guidelines, there are no plans to introduce the CR's four-stage approach – the Czech system only covers stages 3 and 4: i.e. assessment and certification.

- In **French-speaking Belgium**, frameworks for linking validation to the NQF do exist but **are fragmented in practice**. The CVDC works together with social partners to define qualification standards and descriptors up to Level 4 while the process for Levels 5-8 is separately managed by Higher Education Institutions (HEIs). There have been issues around the equivalence of validation outcomes to formal qualifications up to Level 4 due a lack of cooperation between social partners and formal education institutions on the one hand, and to the existence of a parallel system for the definition of qualification standards not linked to the EQF. The CVDC has been instrumental in negotiating with both formal education institutions and social partners to ensure equivalence between validation outcomes and formal qualifications up to level 4 but has only been able to do so on a sector-by-sector basis.
- In **Malta**, the NQF enjoys a high level of awareness among all stakeholders; conversely, **validation is only provided to a limited extent and has not benefitted from major public investments**. Validation outcomes are only linked to an occupational standard with a corresponding EQF level. It is not linked to any credit systems, which creates complications for people wishing to use their validation outcome to enrol in an HEI. Further difficulties have been reported in converting NFIL competences into level 5-7 qualifications because of the highly academic dimension of HE qualifications.

It was reported that the **CR has only resulted in minor progress in the third sector in terms of encouraging the inclusion of volunteering (and transversal) skills into NQFs** and in making validation more visible: youth organisations report that in many Member States, young people are unaware of the possibilities they have to validate their volunteering skills.

Opportunities and challenges

According to experiences at the national level, the development of comprehensive NQFs represents a significant opportunity for improving the offer of validation. However, institutional fragmentation coupled with differences of opinion on qualification standards – often between formal education institutions, social partners and other labour market actors – were reported to be a major obstacle to achieving links between validation and NQF and equivalence between validation outcomes and formal education qualifications.

On the other hand, it was remarked that formal education institutions, particularly HEIs, will increasingly consider validation as an efficient and sustainable way to attract mature students and adult learners in a context where the population is ageing.

In addition, common standards for learning outcomes can be an enabler for validation outcomes to be better recognised in formal education.

Suggestions for improvement

The CR is strongly linked to the concept of learning outcomes already. However, a more holistic approach to the definition and application of learning outcomes may be necessary to ensure better linkages between validation and NQFs and to facilitate equivalence of qualifications.

A2.2.2 How is validation relevant to the shift to learning outcomes and flexible pathways approach

These discussions were about understanding the extent to which the CR is coherent with EU relevant instruments and initiatives to achieve flexible learning pathways, namely: Upskilling Pathways, credit systems such as ECVET and ECTS, and transparency tools to document validation outcomes such as Europass and Youthpass.

Influence of the CR: experiences and observations at the national level

Several stakeholders reported that **validation arrangements** in their respective country cater **for people missing basic skills**, in accordance with the **shared principles of the CR and the Upskilling Pathways** recommendation.

- In **French-speaking Belgium**, validation centres provide short training modules adapted to candidates who lack certain basic skills (e.g. language) to fulfil a qualification standard. The CVDC also took part in a project for the recognition of transversal skills as an indicator of employability – such skills are included in the vocational profiles accompanying the qualification standards against which candidates are assessed. Furthermore, outreach and information sessions – e.g. job fairs, ‘bus tours’ – are used to promote flexible training opportunities as part of the validation process.
- In **Czechia**, skills audits are provided in accordance with the principles of Upskilling Pathways, covering the identification and documentation stages of the validation process. However, these first two stages do not officially feature in Czech legislation on validation.
- In **Malta**, Level 1-3 training courses are provided by lifelong learning centres for potential validation candidates to fulfil a qualification standard. While training the low-qualified to follow through to validation remains challenging, the CR and Upskilling Pathways have both had an influence on the offer of basic skills courses to complement and give value to the knowledge they already possess.

Regarding **synergies with credit systems**, it was revealed that **ECVET is not used** in the context of validation in **French-speaking Belgium**. This is **also the case for Czechia** where in addition **ECTS was reported to be rarely used** by universities in validation for Levels 5-8. In **Malta**, **ECTS credits** were reported to be awarded only based on key competences, but not qualification standards.

Limited evidence of the use of EU transparency tools in the context of validation was given. In French-speaking Belgium, Europass is in theory used for documenting validation outcomes. In Czechia, qualifications obtained from validation can from this year be documented in Europass; it was however reported that practitioners do not know whether to use Europass or Youthpass and that therefore a unique EU transparency tool would be welcome.

On a general note, stakeholders agreed that having **validation outcomes recognised in another EU Member States remains extremely rare or difficult**, suggesting that the **CR has not had a real effect in this regard**. Such recognition tends to be limited to cross-border regions, also thanks to INTERREG initiatives. The CR is far from having had the same effect on the transparent documentation and recognition of validation outcomes as the Bologna process in higher education.

Opportunities and challenges

The Upskilling Pathways and flexible learning approach can act as a steppingstone to validation for people missing basic skills, giving them acknowledgment that their skills have value. However, it often remains difficult in practice for these people to move on to the assessment and certification stages of validation. In the context of higher education – from Level 5 onwards – it was argued that the acquisition of academic skills acts can be an obstacle to validation for people coming from a professional background.

While Europass and Youthpass can be useful portfolio-type instruments, it was questioned whether they can be effectively used for validation purposes.

Suggestions for improvement

The CR predates the Upskilling Pathways recommendation, with the latter referring to the former in several of its provisions. The CR however does not make it sufficiently obvious that validation should come with tailored and flexible training opportunities for the users. The Upskilling Pathways recommendation clearly insists on this point but insufficiently details how transitions to a validation process can take place in practice.

There would therefore be scope for any new recommendation to regroup the principles of the CR and of Upskilling Pathways. Any new policy initiative on validation should have stronger links to flexible learning pathways and should promote the use of innovative solutions (e.g. ICT) for flexible learning.

Better synergies between validation and EU credit systems could be potentially achieved through the definition of qualification standards attached to EU key competences for lifelong learning, especially transversal competences (e.g. acquired through volunteer work).

Lastly, it should be considered whether different EU transparency tools could be regrouped into a single resource with clearer guidance for their use in a validation process.

A2.2.3 Summary: To what extent has the CR contributed to engaging individuals in lifelong learning and to improving the comparability of national validation systems to facilitate EU mobility?

The CR has helped establish learning outcomes (knowledge/skills/competences) as a 'currency' for validation across the EU. However, it was argued that too little time has lapsed to make a valid assessment on the link between validation and NQFs, especially as the latest EQF Recommendation with multiple references to validation was only adopted in 2017. Similarly, it may be too early to observe how flexible or lifelong learning acts as a pathway to validation.

The intended objectives of the CR are restrained by the fragmentation of validation processes observed in many countries, which also comes from disagreements among different stakeholders (from public policy, formal education and the labour market) over the definition of qualification standards.

While the CR has helped shape a more common understanding of validation across the EU, there is still limited comparability between national validation systems in practice and therefore very limited evidence of validation outcomes being used for intra-EU mobility purposes.

Conclusions

The availability and accessibility of validation processes has improved since the introduction of the CR in 2012.

The CR is regarded as having continuously fed into discussions on validation in many Member States and has been used as an input for structuring and systematising validation processes in those countries where they were mostly inexistent prior to 2012.

The CR has contributed to the conceptualisation of a more common approach to validation at EU level, but it has only rarely resulted in legislative change at the national level. Institutional fragmentation has restrained the CR's effectiveness in many countries. Validation cannot operate separately and needs to be embedded in wider skills and lifelong learning strategies, which requires institutional change to facilitate multi-stakeholder collaboration. The fact that the CR is separate from other relevant EU-level instruments and initiatives may have contributed to the compartmentalisation of institutional arrangements in many countries, making any type of collaboration more difficult.

It may still be too early to assess the extent to which the CR and other relevant EU-level instruments can be applied to improve links between validation and formal education systems, to develop flexible learning options as a gateway to validation and to facilitate EU mobility.

Study supporting the evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning

Experiences from different countries suggest that building the expertise and capacity required to achieve this does take time.

Validation does however have a bright future as it can be expected that acquired skills will increasingly require updating to remain relevant to the rapid evolutions of the labour market.

Annex 3 OPC RESULTS AND ANALYSIS

A summary of the results of the OPC is presented here. The analysis covers all responses submitted between 7 August and 13 November 2019.

A3.1 Overall response

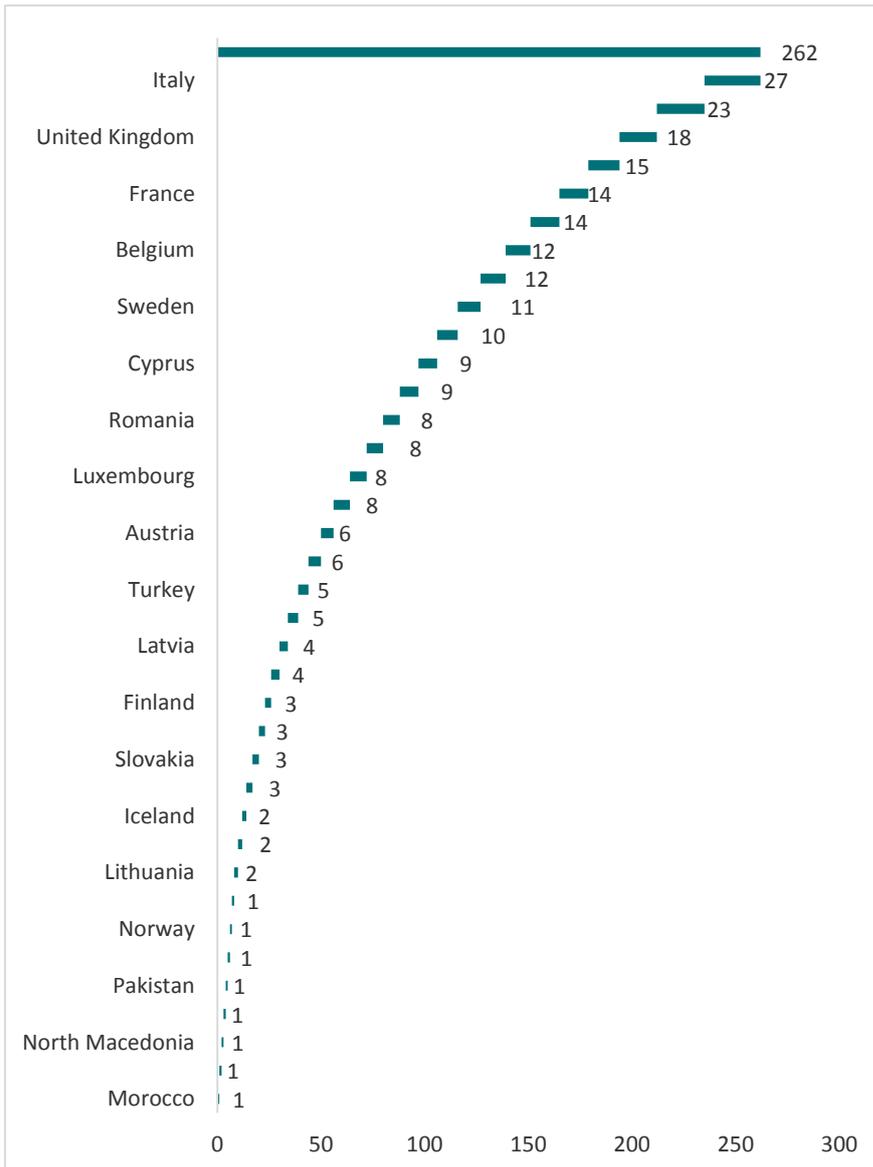
A total of 262 replies to the web based OPC, implemented between 7 August and 13 November 2019, were received. The final analysis of these is included in current report.

Due to a few incomplete or 'blank' responses, sample sizes show small variation across the questions. To that end, sample sizes are provided below each chart for reference.

A3.1.1 By country

Respondents from Italy were most numerous with 27 responses (10%), followed by 23 participants (9%) from Portugal, and 18 responses (7%) from the United Kingdom. Importantly, at least one response was received from each EU Member State.

Figure A3.1 Overview of responses by country

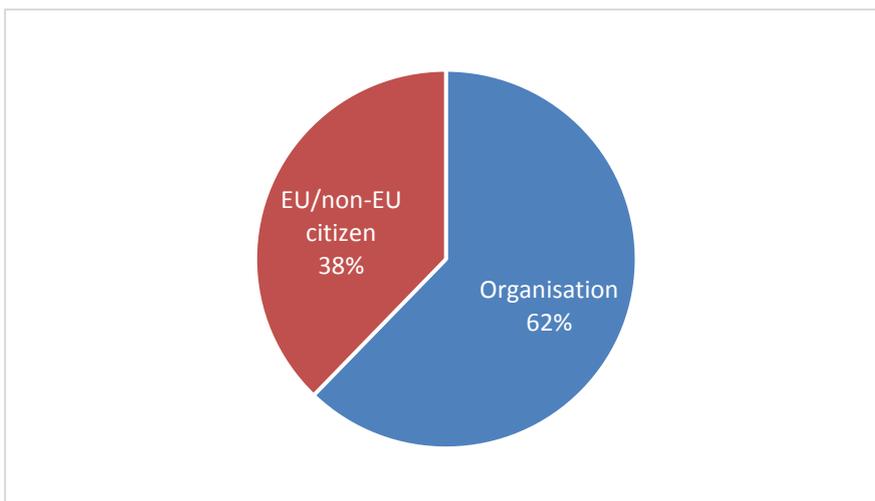


N=262, Source: OPC results

A3.1.2 By participant type

In terms of participant type, the 262 responses split unevenly between organisations (163 responses or 62%) and EU/non-EU citizens (99 responses or 38%). This sample size provides a good basis for analysis as both groups are sufficiently represented, whilst it also allows for further segmentation by type of organisation.

Figure A3.2 Overview by participant type



N=262, source: OPC results

When analysing the type of organisations in the sample, public authorities are most prevalent (44 responses), followed by NGOs (38 responses) and academic/research institutions (31 responses).

Table A3.1 Type of organisations in the sample

Type of organisation	No. of responses
Academic/research institution	31
Non-governmental organisation (NGO)	38
Public authority	44
Other	26
Company/business organisation	11
Business association	6
Trade union	7
Total	163

N=163, Source: OPC results

A3.2 General views and experiences (Q1 to Q3)

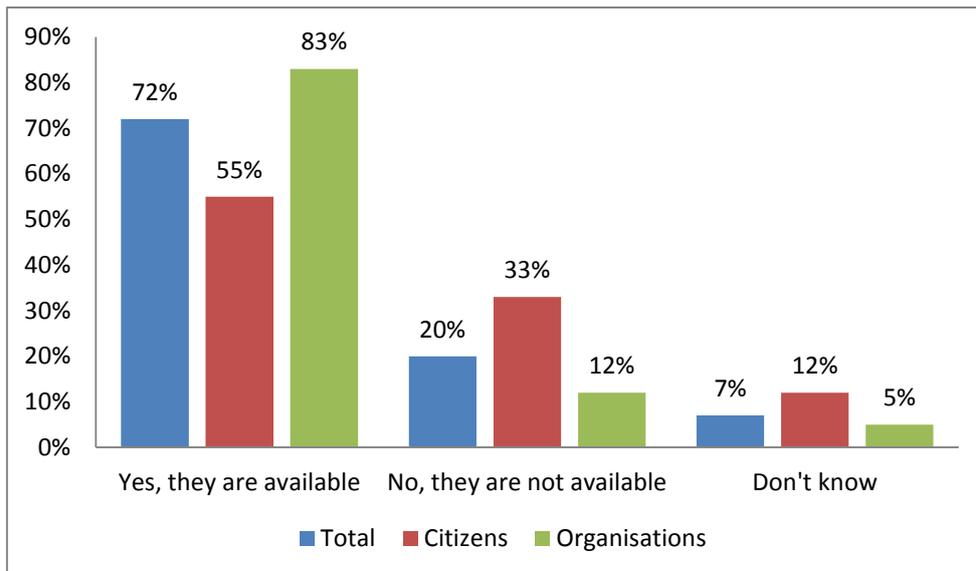
This section covers the OPC questions addressed to all respondents. These questions relate to respondents' personal views and experiences on VNFIL and on policies addressing it

A3.2.1 Availability of VNFIL (Q1)

Question 1 of the OPC asked respondents to indicate whether, to their knowledge, there are possibilities for people in their country to validate the skills they have acquired outside school or university. When looking at the overall results (Figure A3.3), nearly three out of four respondents thought this was the case, 20% believed that such possibilities were not available, whilst 7% selected the don't know option.

Rather unsurprisingly, a significantly larger share of representatives of organisations were aware of validation opportunities compared to citizens (28pp difference).

Figure A3.3 Q1 - To your knowledge, are there possibilities for people in your country to validate the skills they have acquired outside school or university?



$N_{total}=261$, $N_{cit}=99$, $N_{org}=162$ Source: OPC results

Whilst the sample size allows for in-depth analysis per type of organisation, it is not possible in all cases to analyse results by country. An assessment has been undertaken for countries with more than 10 responses whilst the below table provides a full overview regardless the sample sizes.

As it can be seen, validation arrangements appear to be least known in Slovenia (25%), Slovakia (33%), and Spain (57%). Conversely, 93% of the respondents from France and 91% of the respondents from Sweden believed that validating skills acquired outside of formal education is a possibility in their respective countries.

Table A3.2 Q1 response overview by country

Country of origin	Yes, they are available	No, they are not available	Don't know	Total # of answers
Albania	0%	100%	0%	1
Armenia	0%	100%	0%	1
Austria	83%	17%	0%	6
Belgium	83%	8%	8%	12
Bulgaria	88%	13%	0%	8
Croatia	67%	33%	0%	3
Cyprus	44%	44%	11%	9
Czechia	100%	0%	0%	4
Denmark	100%	0%	0%	1
Estonia	100%	0%	0%	2
Finland	100%	0%	0%	3
France	93%	7%	0%	14
Germany	60%	13%	27%	15
Greece	56%	33%	11%	9
Hungary	50%	0%	50%	2
Iceland	50%	50%	0%	2

Country of origin	Yes, they are available	No, they are not available	Don't know	Total # of answers
Ireland	90%	10%	0%	10
Italy	67%	22%	11%	27
Latvia	100%	0%	0%	4
Lithuania	50%	50%	0%	2
Luxembourg	75%	13%	13%	8
Malta	80%	20%	0%	5
Morocco	100%	0%	0%	1
Netherlands	75%	0%	25%	8
North Macedonia	100%	0%	0%	1
Norway	100%	0%	0%	1
Pakistan	0%	100%	0%	1
Poland	100%	0%	0%	6
Portugal	70%	22%	9%	23
Romania	88%	13%	0%	8
Slovakia	33%	67%	0%	3
Slovenia	25%	58%	17%	12
Spain	57%	36%	7%	14
Sweden	91%	9%	0%	11
Switzerland	100%	0%	0%	1
Turkey	60%	40%	0%	5
United Kingdom	83%	11%	6%	18
Grand Total	72%	20%	8%	261

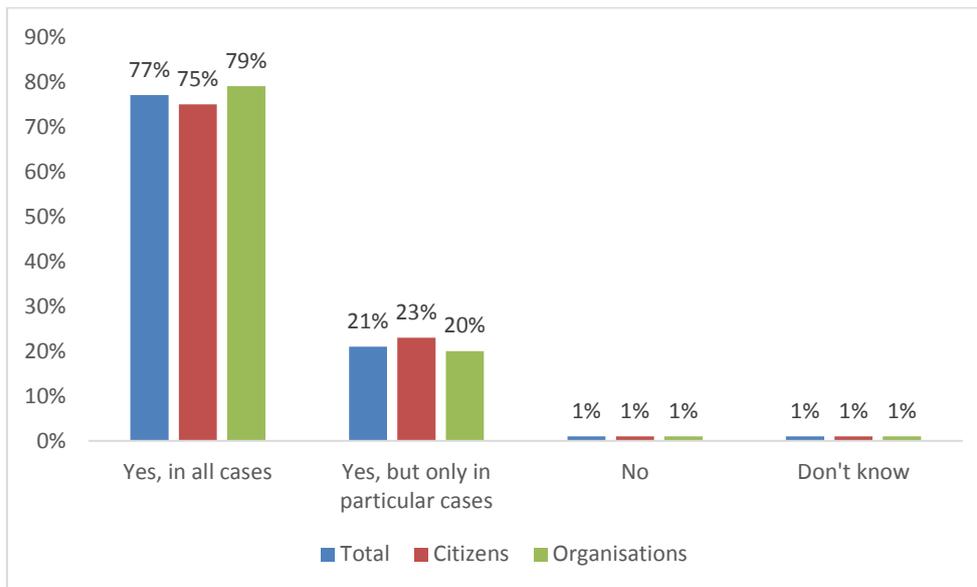
N=261, Source: OPC Results

A total of 88 open-text answers were received to further clarify and explain responses to Q1. Whilst the views are rather heterogeneous, most responses refer to the limited availability of validation arrangements. These are often provided through specific projects and/ or in relation to VET and hard skills. Put differently, well-developed and nationwide procedures are still seldom in place, thus further efforts are required according to the responses.

A3.2.2 Perceived relevance of VNFIL/CR (Q2)

Respondents to the OPC were asked about the relevance of the VNFIL recommendations through indicating whether they think that people who acquired skills in the workplace or outside of formal education should have the possibility to have them validated (Q2). In essence, nearly all respondents agreed with 4 out of 5 OPC participants selecting 'Yes, in all cases' with an additional 21% choosing answer option 'Yes, but only in particular cases'. This positive opinion prevailed among both citizens and organisations without major discrepancies.

Figure A3.4 Q2 - Do you think that people who acquired skills in the workplace or outside school should be able to have them validated?



$N_{total}=259$, $N_{cit}=99$, $N_{org}=160$, Source: OPC results

Analysing responses by type of organisation, representatives of academic/research institution, followed by trade unions and NGOs attached highest level of relevance to validation opportunities.

Table A3.3 Q2 response overview by type of organisation

Type of organisation	Yes, in all cases	Yes, but only in particular cases	No	Don't know	Total # of answers
Academic/research institution	87%	13%	0%	0%	31
Business association	40%	60%	0%	0%	5
Company/business organisation	73%	27%	0%	0%	11
Non-governmental organisation (NGO)	84%	13%	3%	0%	38
Other	69%	31%	0%	0%	26
Public authority	79%	19%	0%	2%	42
Trade union	86%	14%	0%	0%	7
Grand Total	79%	20%	1%	1%	160

$N=160$, Source: OPC results

Analysing results by country, one can observe notably positive results from Belgium Portugal, Slovenia, Spain, Sweden where the vast majority of respondents were of the opinion that validation possibilities should be available in all cases.

Table A3.4 Q2 response overview by country

Country of origin	Yes, in all cases	Yes, but only in particular cases	No	Don't know	Total # of answers
Albania	100%	0%	0%	0%	1
Armenia	100%	0%	0%	0%	1
Austria	60%	40%	0%	0%	5
Belgium	92%	8%	0%	0%	12
Bulgaria	38%	63%	0%	0%	8
Croatia	67%	33%	0%	0%	3
Cyprus	67%	22%	0%	11%	9
Czechia	75%	25%	0%	0%	4
Denmark	100%	0%	0%	0%	1
Estonia	100%	0%	0%	0%	2
Finland	67%	33%	0%	0%	3
France	79%	21%	0%	0%	14
Germany	73%	27%	0%	0%	15
Greece	63%	25%	13%	0%	8
Hungary	100%	0%	0%	0%	2
Iceland	0%	100%	0%	0%	2
Ireland	80%	20%	0%	0%	10
Italy	74%	26%	0%	0%	27
Latvia	75%	25%	0%	0%	4
Lithuania	50%	50%	0%	0%	2
Luxembourg	100%	0%	0%	0%	8
Malta	100%	0%	0%	0%	5
Morocco	100%	0%	0%	0%	1
Netherlands	88%	13%	0%	0%	8
North Macedonia	0%	100%	0%	0%	1
Norway	100%	0%	0%	0%	1
Pakistan	100%	0%	0%	0%	1
Poland	83%	17%	0%	0%	6
Portugal	83%	13%	4%	0%	23
Romania	88%	13%	0%	0%	8
Slovakia	67%	33%	0%	0%	3

Country of origin	Yes, in all cases	Yes, but only in particular cases	No	Don't know	Total # of answers
Slovenia	83%	17%	0%	0%	12
Spain	86%	7%	0%	7%	14
Sweden	82%	18%	0%	0%	11
Switzerland	0%	100%	0%	0%	1
Turkey	60%	40%	0%	0%	5
United Kingdom	78%	22%	0%	0%	18
Grand Total	77%	21%	1%	1%	259

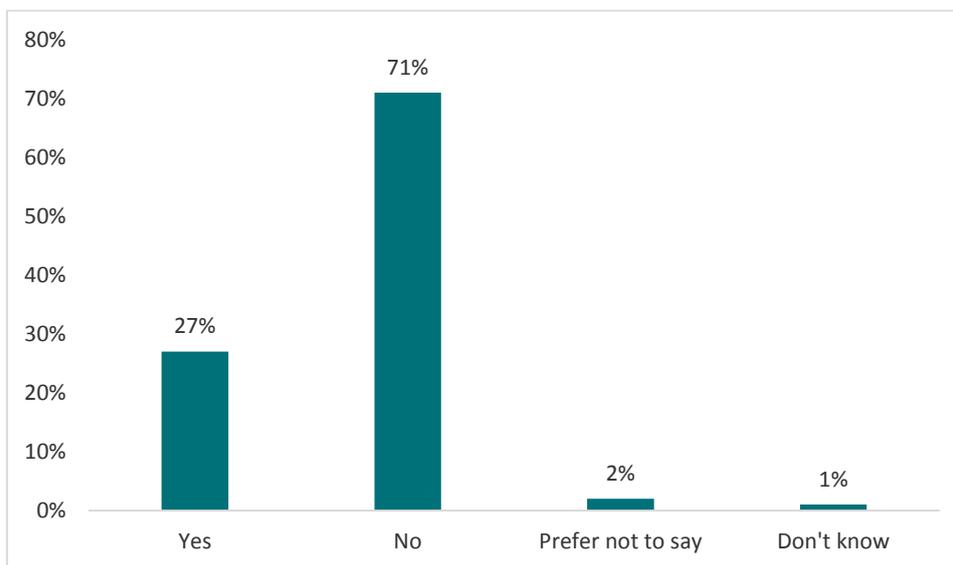
N=259, Source: OPC results

There is a consensus among those 48 OPC respondents who provided further comments in form of open-text answers that validation is relevant and is a necessity, especially in relation to lifelong learning. In the meantime, there are different opinions as to what skills/ education level and in what cases validation should cover. Different positions were also communicated concerning the outcomes of validation.

A3.2.3 Participation in VNFIL (Q3)

One out of four OPC respondents stated that they themselves have participated in a programme to validate skills acquired outside an education programme as shown in the figure below.

Figure A3.5 Q3 - Have you personally participated in a programme to validate skills you acquired (through work, community groups, volunteering etc.) outside an education programme?



N=256, Source: OPC results

The share of respondents indicating having participated in a validation programme in countries with the most numerous respondents is 22% in Italy and 26% in Portugal. Importantly, 61% of UK respondents indicated having taken part in a programme aiming to validate skills acquired earlier outside of formal education.

Table A3.5 Q3 response overview by country

Study supporting the evaluation of the Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning

Country of origin	Yes	No	Prefer not to say	Don't know	Total # of answers
Armenia	0%	100%	0%		0
Albania	0%	100%	0%	0%	1
Armenia	0%	100%	0%	0%	1
Austria	20%	80%	0%	0%	5
Belgium	33%	67%	0%	0%	12
Bulgaria	13%	88%	0%	0%	8
Croatia	100%	0%	0%	0%	3
Cyprus	50%	50%	0%	0%	8
Czechia	25%	75%	0%	0%	4
Denmark	0%	100%	0%	0%	1
Estonia	50%	50%	0%	0%	2
Finland	67%	0%	33%	0%	3
France	7%	93%	0%	0%	14
Germany	21%	64%	7%	7%	14
Greece	22%	78%	0%	0%	9
Hungary	50%	50%	0%	0%	2
Iceland	50%	50%	0%	0%	2
Ireland	22%	78%	0%	0%	9
Italy	22%	74%	4%	0%	27
Latvia	0%	100%	0%	0%	4
Lithuania	0%	100%	0%	0%	2
Luxembourg	50%	50%	0%	0%	8
Malta	20%	80%	0%	0%	5
Morocco	100%	0%	0%	0%	1
Netherlands	13%	88%	0%	0%	8
North Macedonia	0%	100%	0%	0%	1
Norway	0%	100%	0%	0%	1
Pakistan	0%	100%	0%	0%	1
Poland	0%	100%	0%	0%	6
Portugal	26%	74%	0%	0%	23
Romania	38%	63%	0%	0%	8
Slovakia	33%	67%	0%	0%	3
Slovenia	17%	83%	0%	0%	12
Spain	21%	79%	0%	0%	14
Sweden	0%	80%	10%	10%	10

Country of origin	Yes	No	Prefer not to say	Don't know	Total # of answers
Switzerland	0%	100%	0%	0%	1
Turkey	40%	60%	0%	0%	5
United Kingdom	61%	39%	0%	0%	18
Grand Total	27%	71%	2%	1%	256

Source: OPC results

A3.3 Technical part (Q4 to Q13)

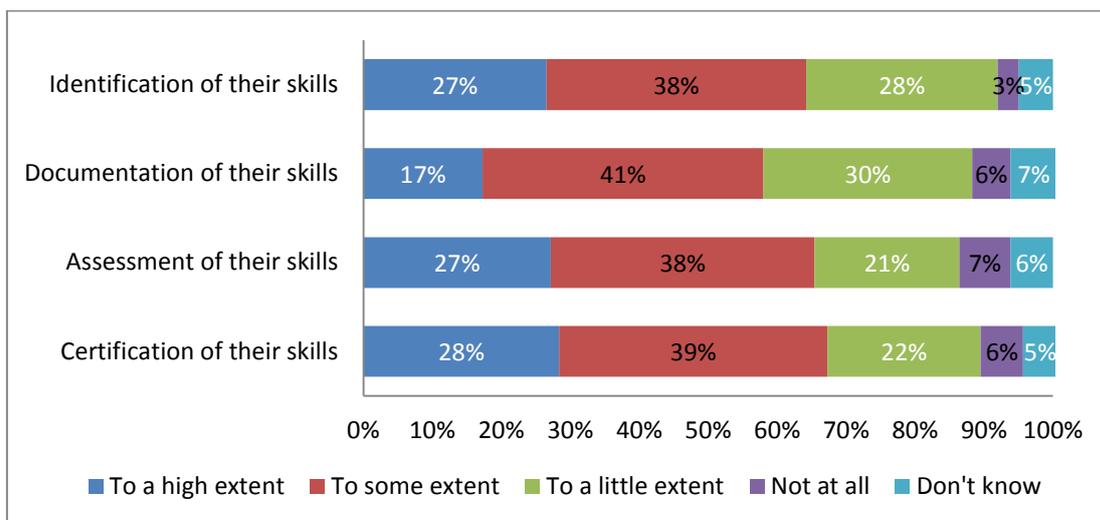
This section covers the OPC questions addressed to organisations either involved or interested in the implementation of the VNFIL CR.

A3.3.1 Effectiveness (Q4 to Q8)

Of the four distinct stages of validation, certification appears to be most prevalent whilst documentation of skills the least common, as presented in Figure A3.6. On a positive note, at least 60% of respondents believed in relation to all four stages that these can be obtained to a high or some extent.

No comparative analysis by country is yet possible due to the small number of responses by country.

Figure A3.6 Q4 To what extent can people in your country obtain:



N=162-163, Source: OPC results

A total of 34 respondents provided further comments. An important share of these describe hindering effects, including complex and lengthy validation processes, the limited possibilities for identification and documentation of skills, as well as limited awareness about the validation possibilities. As pointed out above, validation often covers only a set of professions and skills rather than being offered on a universal basis.

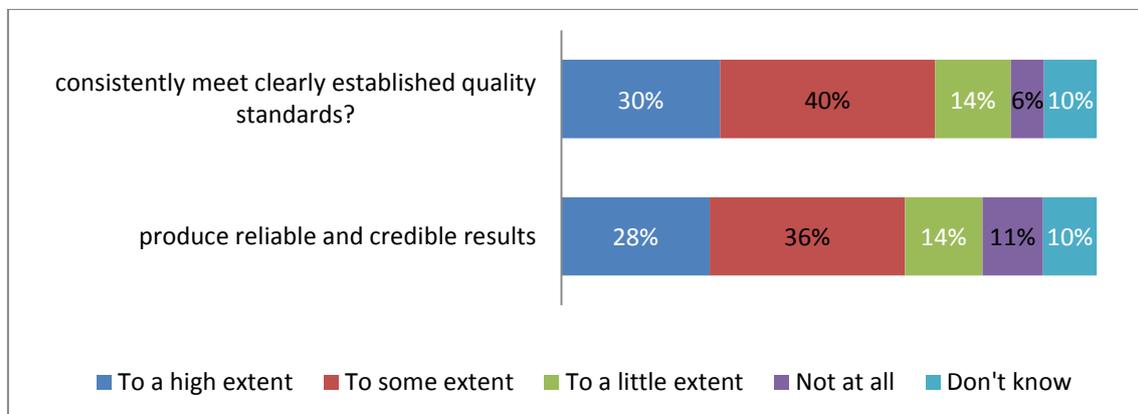
In relation to quality standards and reliable results of validation services, organisations taking part in the OPC were asked to give their opinion on two statements. As Figure A3.7 shows, answers are rather comparable and follow the same tendency. Approximately, one third of the respondents fully agreed VNFIL consistently meet quality standards and produce reliable results to a high extent, while 36% of the respondents agreed to some extent. In the meantime, 6% of respondents believed

that validation services do not at all meet consistently clearly established quality standards and 11% that they do not at all produce reliable and credible results.

Respondents on behalf of NGOs most frequently indicated that validation services in their respective country fail to consistently meet established quality standards (26% or N=10 responded 'to a little extent', and 11% or N=4 responded 'not at all') or to produce reliable and credible results (13% or N=5 responded 'to a little extent', and 26% or N=10 responded 'not at all'). Conversely, respondents on behalf of trade unions most frequently agreed that validation services in their respective country meet established quality standards (86% or N=6 agreed to some or to a high extent) and produce reliable and credible results (71% or N=5 agreed to some or to a high extent). In terms of countries, the share of those agreeing with the two statements is remarkably low among respondents from Italy (40%, N=6 agreed to some or to high extent in relation to statement meeting established quality standards whilst 28%, N=4 agreed to some or to high extent in relation to statement producing reliable and credible results) and Portugal (63%, N=10 agreed to some or to high extent in relation to statement meeting established quality standards whilst 44%, N=7 agreed to some or to high extent in relation to statement (countries with most numerous answers) compared to the average.

A total of 70 open-text responses were received and provided further insights related to the quality standards and reliable and credible results. Those with the opinion that validation services consistently meet clearly established quality standards associate this with the well-established legal frameworks, well-functioning implementation mechanisms, the links between validation and the NQFs and robust QA involved. In the meantime, a significant share of OPC respondents noted that there is no uniform, recognised system of validation or that the systems are currently being developed. In addition, they also state that validation is a complex, time consuming and costly procedure for employers.

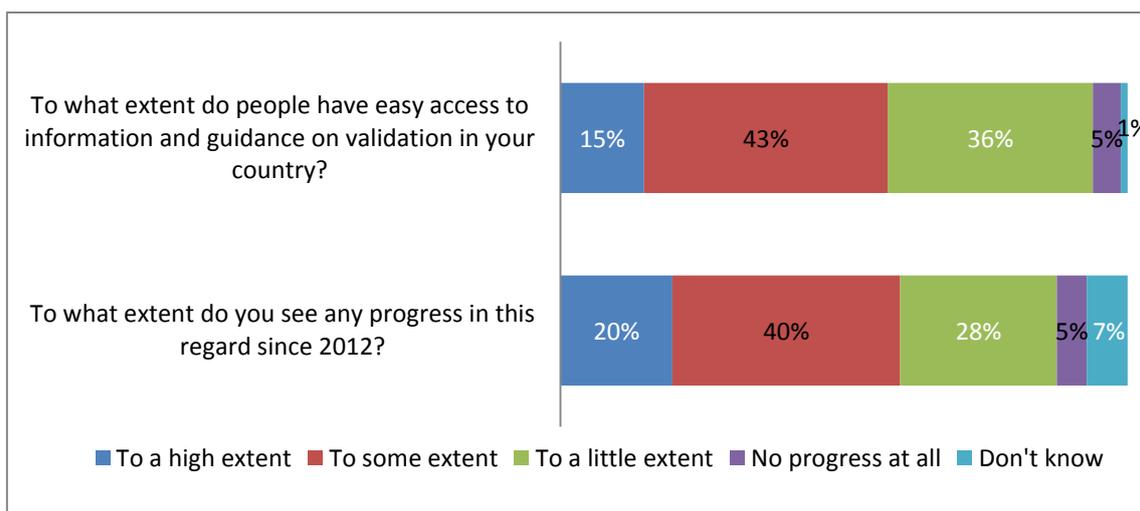
Figure A3.7 Q5 Do you think that validation services in your country:



$N_1=162$, $N_2=159$, Source: OPC results

Concerning easy access to information and guidance on validation, 58% of the responding organisations believed this was the case to a high or some extent, as shown in Figure A3.8. In addition, 60% considered progress has been relatively significant in this regard since 2012 with only 5% indicating there was no progress at all.

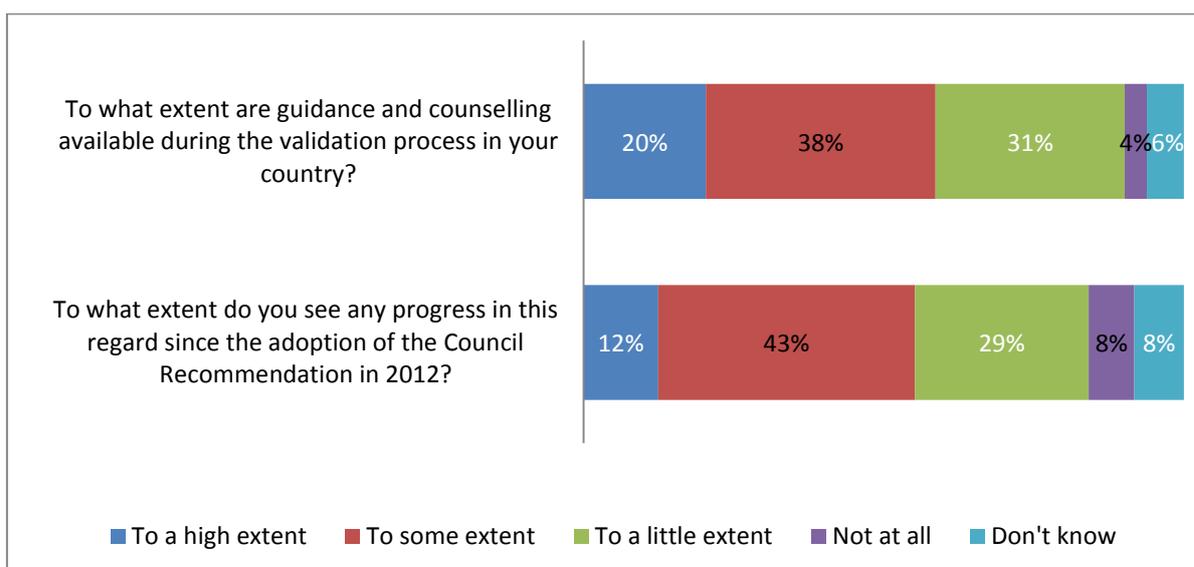
Figure A3.8 Q6 and Q6a response overview



$N_1=163.$, $N_2=152$, Source: OPC results

Looking at Figure A3.9, one can observe similar trends concerning the availability of guidance and counselling during the validation process, with 58% stating this is the case to a high or some extent. The share of those considering there was good progress (some or high) is somewhat lower in this case, amounting to 55% of all answers.

Figure A3.9 Q7 and Q7a response overview

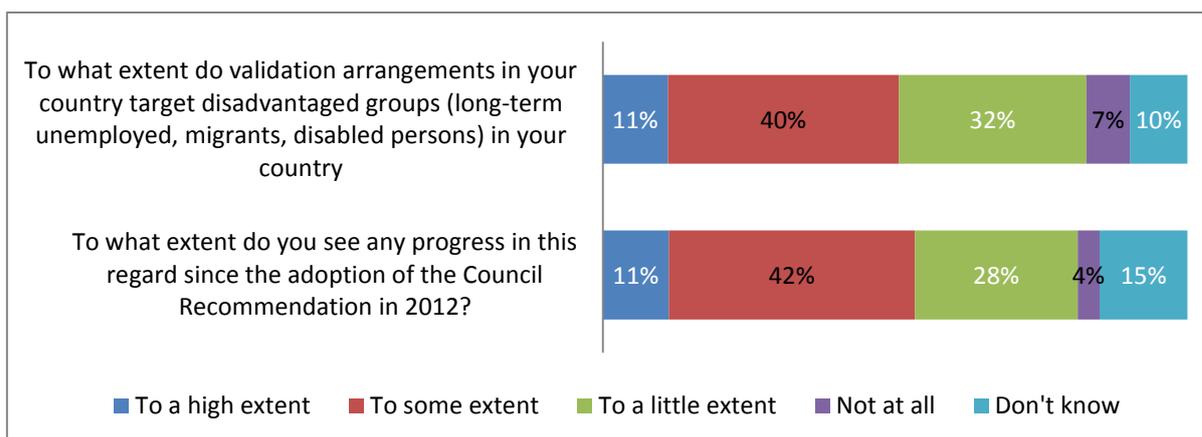


$N_1=162$, $N_2=145$, Source: OPC results

Just above half of the responding organisations believed that validation arrangements target disadvantaged groups (long-term unemployed, migrants, disabled persons) either to a high or to some extent, as presented by Figure A3.10. The share of those indicating 'to a little extent' or 'not at all' is the highest in relation to this effectiveness question.

As for progress, 53% of respondents were of the opinion that considerable progress was made.

Figure A3.10 Q8 and Q8a response overview

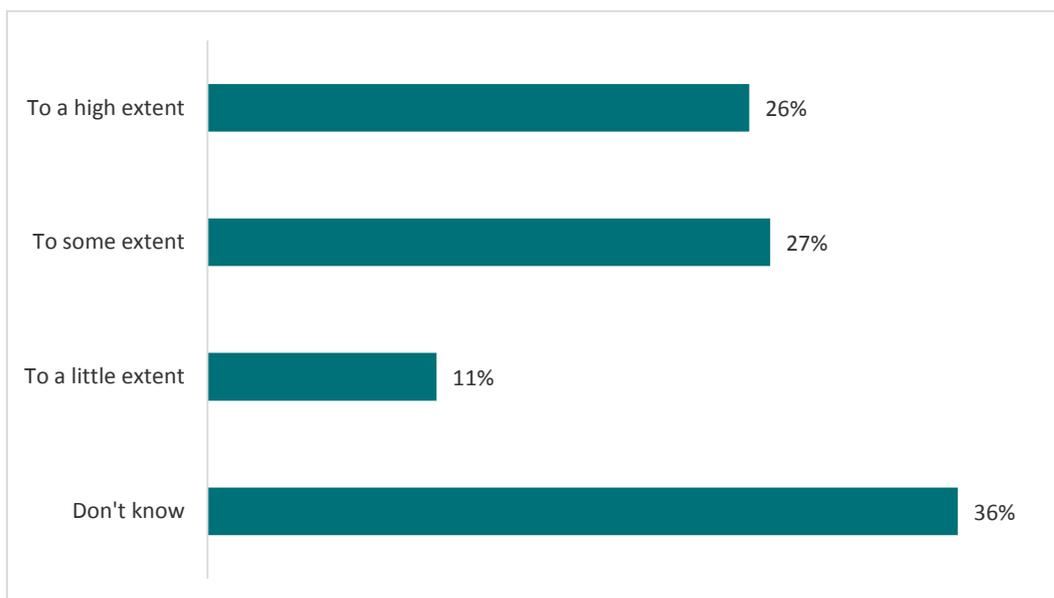


$N_1=162$, $N_2=133$, Source: OPC results

A3.3.2 Efficiency (Q9)

Concerning efficiency of the Council Recommendation, a significant proportion of the responding organisations (36%) did not know to what extent the costs of implementation are proportionate to the benefits to individuals, the economy and society. 27% thought this was the case to some extent with an additional 26% indicating the answer option 'to a high extent'.

Figure A3.11 Q9 Overall, to what extent do you consider that the cost of implementing the Council Recommendation are proportionate to the benefits to individuals, the economy and society?



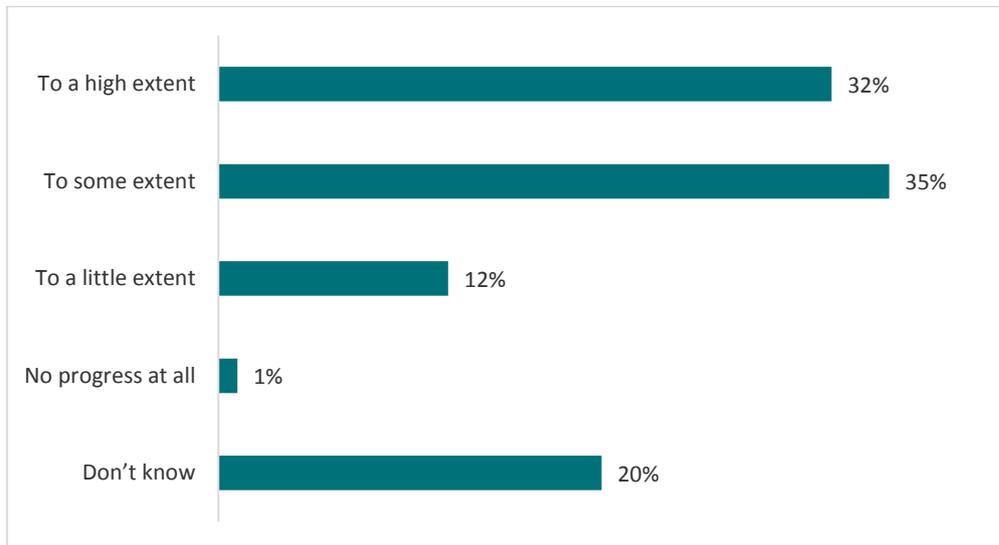
$N=162$, Source: OPC results. Answer option 'Not at all' not selected by any of the respondents.

When reviewing the 50 open-text answers, most respondents (53%) believe that benefits generated by the CR are relatively proportionate or superior to the costs of its implementation – in some cases they added that this is not yet the case but will be once validation arrangements are fully in place. These views refer to a more educated and competitive society, and the equal chances that are provided for all through validation. In the meantime, there are voices who find validation too costly and complicated with little return. Further clarification, however, is not provided in support of this statement.

A3.3.3 Relevance (Q10, Q11)

Most respondents on behalf of an organisation agreed (32% to a high extent and 35% to some extent) that the Council Recommendation has appropriately addressed the needs of their respective organisation, as shown in Figure A3.12. Conversely, 12% considered the CR to address the needs of their organisation to a little extent with 1% considering this was not at all the case.

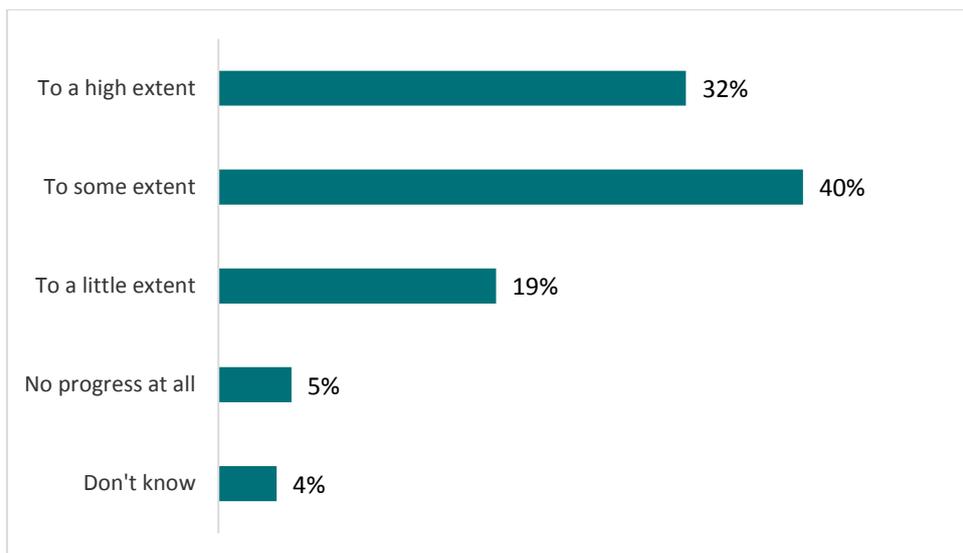
Figure A3.12 Q10 To what extent do you think the Council Recommendation appropriately addresses the needs of your organisation:



N=159, Source: OPC results

Concerning the involvement of all interested parties in the development of validation policies and initiatives, the majority of respondents indicated either high extent (32%) or to some extent (40%) as illustrated in Figure A3.13. Importantly, the share of those indicating 'to a little extent' is highest in relation to this relevance question, accounting for 19%. An additional 5% indicated this was not at all the case ('No progress at all').

Figure A3.13 Q11 To what extent do you think the development of validation policies and initiatives in your country involve all interested parties?

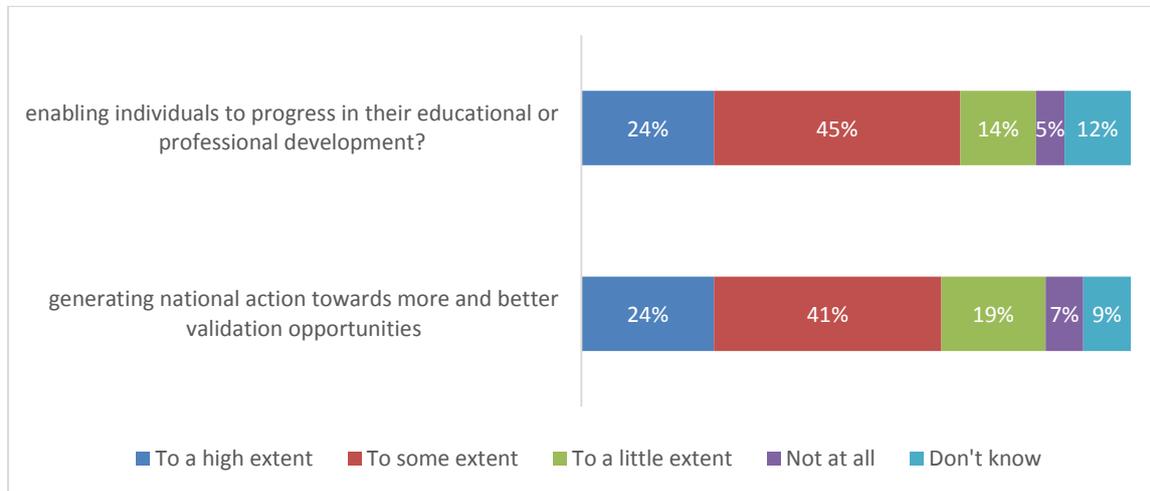


N=162. Source: OPC results

A3.3.4 EU added value (Q12, Q13)

Related to EU added value, OPC respondents were asked to what extent has the Council Recommendation contributed to enabling individuals to progress in their educational or professional development, as well as to generating national action towards more and better validation opportunities. Responses provided follow the same trend, thus are discussed together. In general, answer options 'high' and 'to some extent' were selected by every second respondent.

Figure A3.14 Q12 To what extent do you think that the Council Recommendation has contributed to:



$N_{1,2}=162$. Source: OPC results

Among the different organisation types, 45% of the respondents on behalf of companies or business organisations (5 out of 11) most frequently agreed to a high extent that the CR both contributed to national actions towards more and better VNFIL opportunities and to enhancing the availability of VNFIL. Conversely, respondents on behalf of trade unions most frequently thought that the CR only contributed to a little extent to national actions towards more and better VNFIL opportunities (29% or 2 out of 7 respondents; vs. 20% overall) or to enhancing the availability of VNFIL (57% or 4 respondents vs. 23% overall).

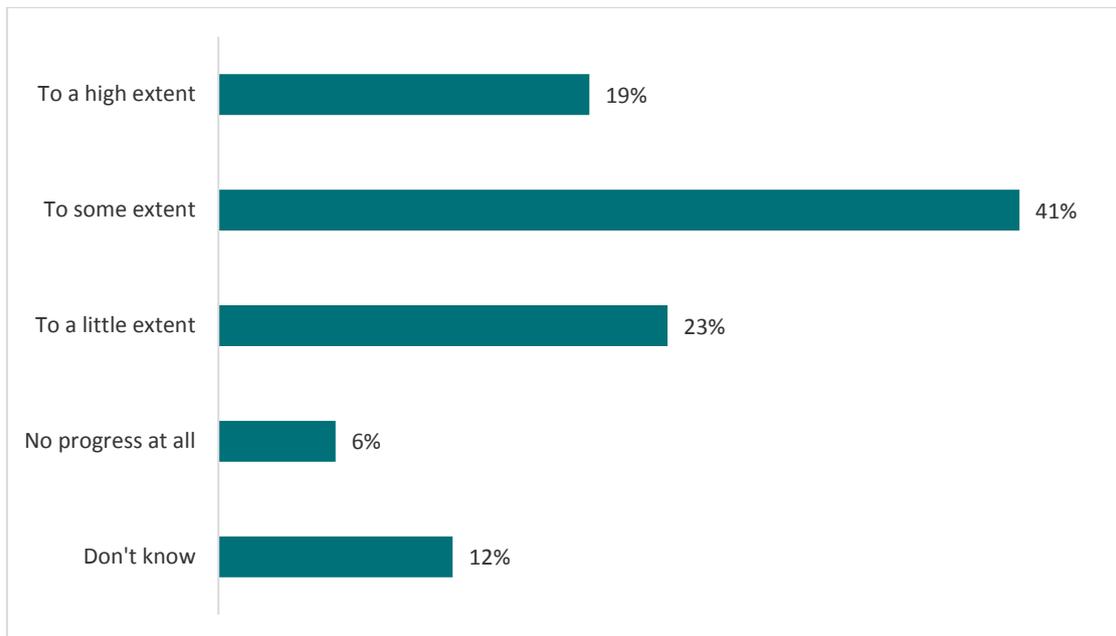
Responses from organisations in Italy and Portugal – countries with most numerous answers – largely follow the overall trends. In Italy, 4 out of 15 responding organisations agreed 'to a high extent' and 5 'to some extent' that the CR has generated national action towards more and better validation opportunities; while 3 out of 15 responding organisations agreed 'to a high extent' and 6 'to some extent' that the CR has contributed to make validation more available to people. In Portugal, 3 out of 16 responding organisations agreed 'to a high extent' and 6 'to some extent' that the CR has generated national action towards more and better validation opportunities; while 2 out of 16 responding organisations agreed 'to a high extent' and 9 'to some extent' that the CR has contributed to make validation more available to people.

A total of 63 free-text responses were provided in relation to the important role of the Council Recommendation. OPC participants mentioned that the Recommendation gave the impetus, have been and are the driving force for developing validation arrangements. To that end, some suggest a renewal and update of the Recommendation. On the other hand, a few respondents thought the results are visible only to a limited extent and feel that there is little public discourse that would facilitate a shared understanding both by decision makers and validation experts working at the field.

60% of the OPC respondents believed that the CR contributed to make validation more available to people to a high or some extent as presented in Figure A3.15. Conversely,

23% indicated this was the case to a little extent with 6% considering there was no progress at all.

Figure A3.15 Q13 In general, to what extent do you think the Council Recommendation has contributed to make validation more available to people?



N=162. Source: OPC results

A3.4 Experiences with VNFIL (Q14 to Q19)

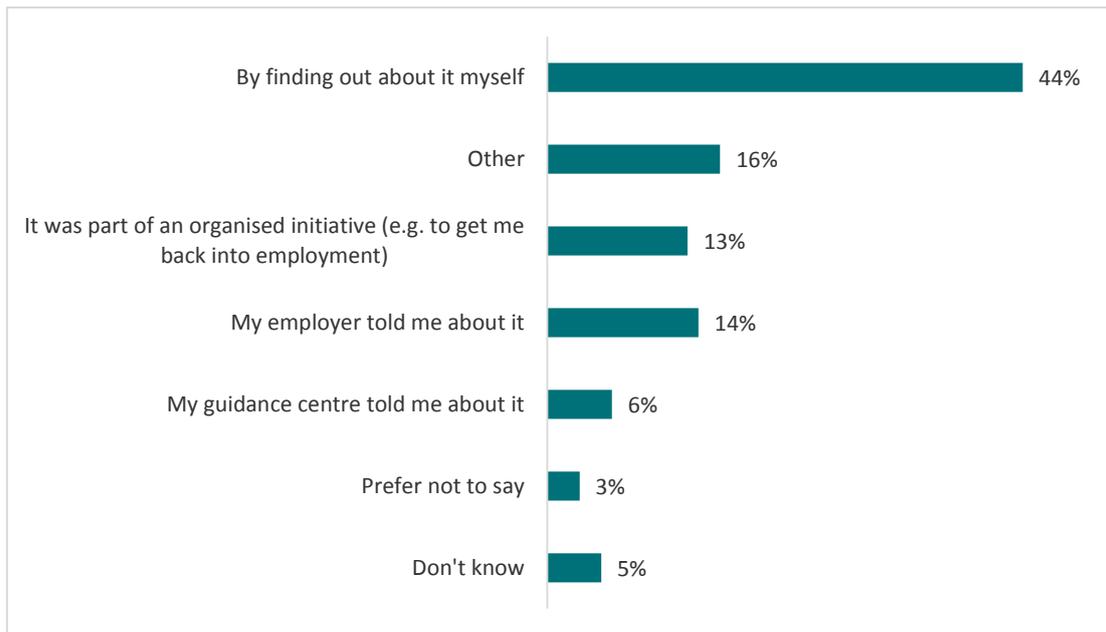
This section summarises the answers to the questions targeting respondents indicating having taken part in a VNFIL process. As reported in Q3, 27% of the survey respondents indicated having taken part in VNFIL. Due to the relatively low number of responses, cautious approach to the figures presented below is recommended in order to avoid inflating and misinterpreting tendencies.

A3.4.1 Access to VNFIL (Q14)

As OPC results suggest so far, the most typical way for a person to access a validation initiative is by finding out about it themselves (44% of responses). A nearly equal share of respondents indicating having recently participated in validation (13% and 14%, respectively) indicated that it was either part of an organised initiative, their employer told them about it; or they accessed it through other ways. Only 6% of the respondents indicated taking part in a validation activity after receiving information from their career guidance centre. Importantly, 16% selected the 'Other' option which were as:

- Using the Youthpass certificate in the remit of Erasmus+ projects
- Through regional initiative/ project
- Invited to be an evaluator

Figure A3.16 Q14 How did you access the validation initiative that you used? (Please select the most appropriate answer - only one)



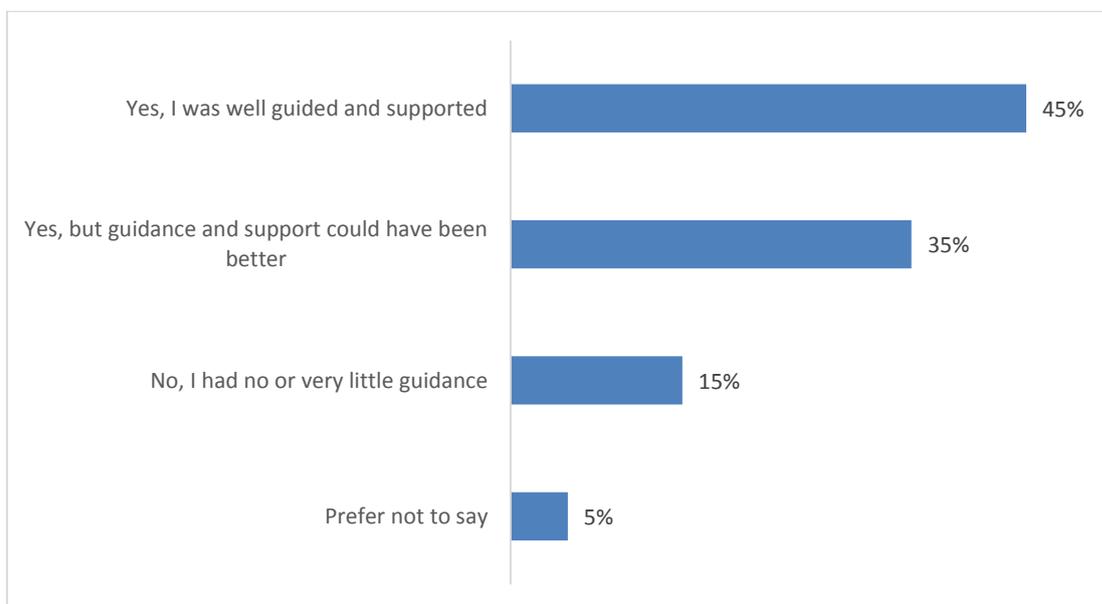
N=64, Source: OPC results

Only three open-text answers were received which do not provide further key insights.

A3.4.2 Guidance (Q15)

Nearly half of respondents stated they were well guided and supported during the validation process, whilst 35% said they received guidance and support, these, however, could have been better. Only 15% said they had no guidance at all or only to a limited extent.

Figure A3.17 Q15 Were you guided and supported during the validation process?



N=63, Source: OPC results

Nine open-text answers were received. Most responses reiterated the importance of guidance during validation process whilst one respondent mentioned that he had the opportunity to undergo a training on how to prepare a portfolio.

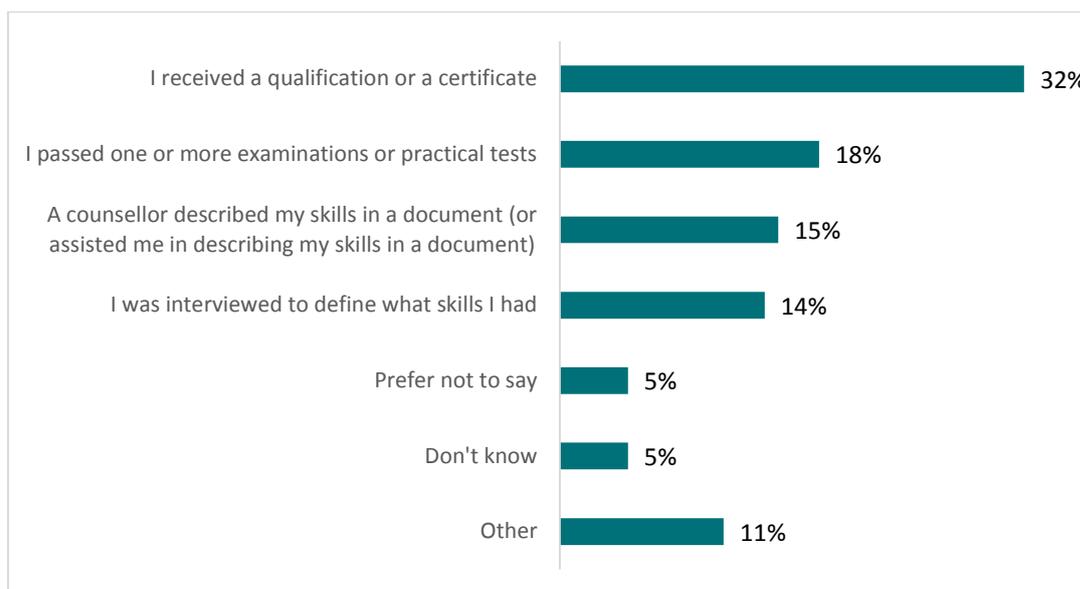
A3.4.3 Stages covered (Q16)

When asked about what steps did the validation process include (see Figure A3.18), a third of the OPC respondents stated they received a qualification or a certificate. This is followed by examinations or practical tests (18%), and the answer option 'a counsellor described my skills in a document (15%)'. An additional 14% indicated they were interviewed to define what skills they had.

Regarding the answer option 'Other', the following responses were provided:

- Presentation of personal development plan after portfolio assessment
- Documentation / submission of all certificates (work, education, training)
- Preparation of a dossier on the strategical skills

Figure A3.18 What steps did the validation process include? (Indicate as many as necessary)



N=106 due to multiple choice, Source: OPC results

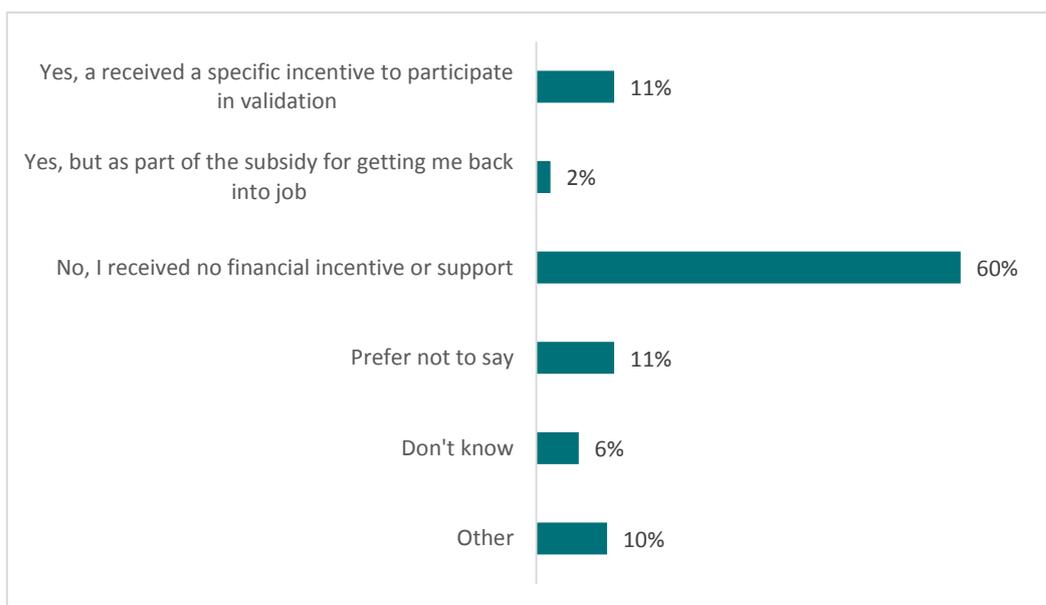
A3.4.4 Financial support (Q17)

The majority of respondents stated they have received no financial incentive or support related to validation process, as shown in Figure A3.19. Against this rather alarming result, 11% stated they have received a specific incentive to participate in validation and only 1% (1 respondent) said (s)he received financial support as part of the subsidy for getting him/her back into work.

Regarding the answer option 'Other', the following responses were provided:

- Training course funded by ESF;
- Project funded by the National Agency for Youth in Italy;
- Training programme publicly funded;
- Company provided tools;

Figure A3.19 Q17 Have you received any form of financial incentive or support related to the validation process?

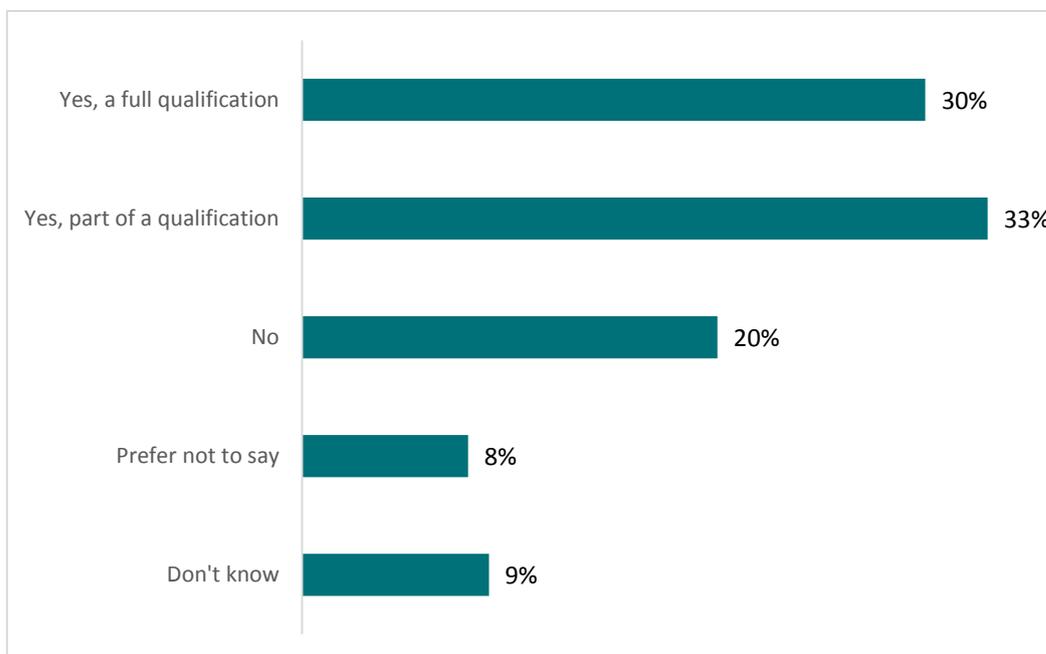


N=63, Source: OPC results

A3.4.5 Outcomes (Q18)

In terms of outcomes, 30% of the respondents stated they received a full qualification, whilst another 33% received part of a qualification as a result of taking part in a validation programme. Conversely, 20% stated neither of these was the case.

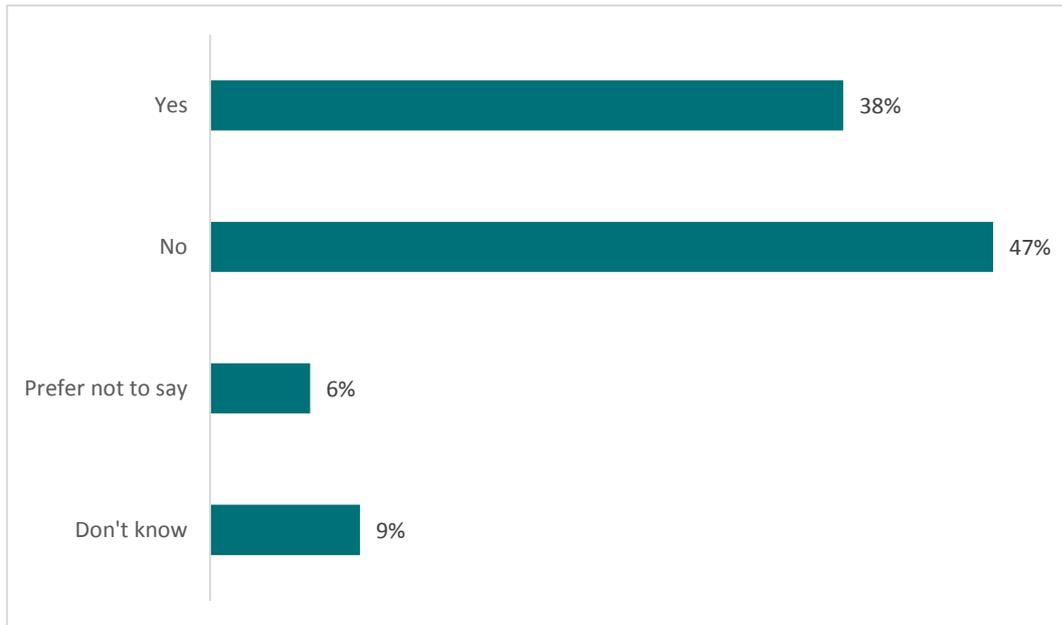
Figure A3.20 Q18 Did the validation programme you took part in enable you to obtain a qualification or certificate, or part of a qualification (e.g. exemption from part of a course)?



N=64, Source: OPC results

As shown in Figure A3.21, 38% of OPC respondents stated that the qualification or certificate they obtained after undergoing validation was identical (or equivalent) to a qualification or certificate obtained through formal education. In the meantime, 47% stated this was not the case, 6% preferred not to say it whilst 9% did not know.

Figure A3.21 Q18a Is the qualification or certificate you obtained after undergoing validation the same that can be obtained through a formal programme (i.e. from school, college, university etc.)



N=64, Source: OPC results

Only two open-text answers were received which do not provide further key insights.

A3.4.6 Overall experience (Q19)

A total of 23 OPC participants provided further insights about their overall experience. In terms of 'what went well', respondents said the validation offered them a truly personalised learning experience with goals and a guided process. Some respondents mentioned that validation made a change of career possible.

As for areas for improvement, respondents refer to the complex, lengthy, and often costly procedure. Recognition remains an issue and to that end 'government and the social partners should invest heavily in order to reinforce this awareness.

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