

UEAPME¹ position paper on a proposal for a Council Recommendation on the validation of non-formal and informal learning

Introduction

Following a public consultation in 2010/11, the European Commission adopted a proposal for a Council Recommendation on the validation of non-formal and informal learning on 5 September 2012².

General comments

UEAPME welcomes the proposed Recommendation to better recognise and validate the skills acquired through non-formal and informal learning. It should contribute to enhancing the employability of workers and competitiveness of companies, alleviate the skills mismatch, as well as promote flexible learning pathways, and further facilitate bridges between VET and general education.

However, UEAPME considers the aim should not be to create validation systems in parallel to the formal education and training systems, but to integrate the validation process into existing national education and training systems. According to UEAPME such an integrated approach is the most appropriate way to ensure the results of the recognition and validation of informal and non-formal learning are fully accepted. Furthermore, the access to partial qualifications should primarily aim to encourage the take-up of further education and training, with the ultimate aim of gaining a full qualification.

Due to the diversity in the recognition and validation of informal and non-formal learning, including legal frameworks in Europe, the Recommendation should be implemented with the full involvement of social partners. In addition, any undue burdens and additional costs for SMEs and crafts companies must be avoided.

Specific comments

The Recommendation requests member states to set up national systems for the validation of non-formal and informal learning. UEAPME disagrees with the creation of “systems” and instead is in favour of procedures. This is also consistent with the Bruges Communiqué, which was jointly adopted by governments and European social partners. It sets as a short-term deliverable “to develop and promote the use of procedures for the validation of non-formal and informal learning supported by EQF/NQFs and guidance” for 2011 to 2014. Therefore, the text should throughout refer to national validation “procedures” and / or “approach” and not to systems.

Further, it is foreseen for individuals to “obtain” partial qualifications on the basis of the validation of non-formal or informal learning. Whilst we support the principle and consider that it serves as an important incentive for training and for improving competences, we disagree with the notion of “obtaining” a partial qualification. The purpose should be to “grant access” to partial qualifications as a stepping stone, taking into account that the ultimate goal should remain a full qualification.

¹ UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](https://ec.europa.eu/transparency/REG_INT/interest/55820581197-35).

² See UEAPME reply to the EC consultation on the promotion and validation of non-formal and informal learning in 2011. http://www.ueapme.com/IMG/pdf/UEAPME_reply_Consultation_non_formal_and_informal_learning_final.pdf

On the relationship of validation systems to the NQF, UEAPME points out that a system cannot be part of a qualifications framework. At the same time, we agree that the validation of learning outcomes should be clearly linked to the levels of the national qualifications framework and other EU transparency tools, such as ECVET to promote synergies.

UEAPME appreciates the proposed involvement of all stakeholders, including employers, chambers of skilled crafts and commerce. This inclusive approach should help to better spread the validation principles and to avoid unnecessary bureaucratic procedures and additional costs for SMEs and Crafts.

UEAPME particularly welcomes the EU's willingness to foster an exchange of effective good practice, as well as peer learning. It should help to overcome any prejudice and cultural barriers by proving that the validation of non-formal and informal learning is a serious exercise. Making the learning outcomes comparable requires adequate methods based on good evaluation tools and full transparency. Similarly, member states should provide better information and guidance on the validation mechanisms to all stakeholders and in particular to the end user.

On the implementation timeline, UEAPME has doubts as to whether the Recommendation can be fully in place and also cover all education sectors by 2015. This applies in particular to Member States that are less advanced in the area of validating non-formal and informal learning.

Conclusion

To conclude, UEAPME endorses the proposed Recommendation on the validation and recognition of non-formal and informal learning, which should make a valuable contribution to improving the employability of workers and better matching skill requirements of companies. However, some finetuning is still required to make it a fully workable proposal.

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For further information on this position paper, please contact:

Name: Helen Hoffmann

Title: Adviser for Social Affairs

Email: h.hoffmann@ueapme.com