

ETUC Position on enhancing validation of non-formal and informal learning

Adopted at the virtual Executive Committee meeting of 22-23 March 2021

Background

On 1 July 2020, the European Commission published a new package of policy initiatives, the so-called Updated Skills Agenda¹ accompanied by a [Commission Staff Working Document: Evaluation of the 2012 Council Recommendation on validation of non-formal and informal learning \(2020\)](#). The latter assesses the implementation of the [Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning](#) (NFIL).

The aforementioned Council Recommendation requires the Member States to support individuals when validating their skills for further learning and career development. The European Commission differentiates between **formal** (e.g. institutional education and training programmes), **non-formal** (e.g. in-company training) and **informal** (e.g. work and life experience) **learning**, from a lifelong learning perspective. According to the Council Recommendation “(i) **validation** means a process of confirmation by an authorised body that an individual has acquired learning outcomes measured against a relevant standard and consists of the following four distinct phases: 1. *Identification* through dialogue of particular experiences of an individual; 2. *Documentation* to make visible the individual's experiences; 3. a *formal assessment* of these experiences; and 4. *Certification* of the results of the assessment which may lead to a partial or full qualification; and (j) **recognition of prior learning** means the validation of learning outcomes, whether from formal education or non-formal or informal learning, acquired before requesting validation.”²

The European Commission's Advisory Group on European Qualification Framework (EQF) has been following up on the implementation of the Council Recommendation on NFIL. Countries were asked to link the qualifications/certificates validated through NFIL to the formal education and training qualifications in their national qualifications frameworks (NQFs). The EQF Advisory Group is now discussing the Commission Staff Working Document on the Evaluation of the 2012 Council Recommendation.

¹ [Communication on a "European Skills Agenda for sustainable competitiveness, social fairness and resilience", 2020](#)

² [Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning](#)

This position paper is ETUC's contribution to the EU-level policy discussion on enhancing policies and measures to support individuals in the validation of non-formal and informal learning. It seeks to:

- *Enforce the implementation of the Council Recommendation of 20 December 2012, on the validation of non-formal and informal learning (NFIL) by a Council conclusion;*
- *Enhance guidance and counselling available to workers and the unemployed through a dedicated EU policy, e.g. a Council Recommendation/Conclusion*

Digitalisation and decarbonisation are having an enormous impact on the European workforce. Thus, ETUC has been demanding effective upskilling and reskilling strategies that support workers in this transition. According to the latest Cedefop report³, 46.1% of the adult population, approximately 128 million adults in the EU-27 Member States, the UK, Iceland and Norway, need upskilling and reskilling. *“These adults may present low education, low digital skills, low cognitive skills or are medium-high educated at risk of skill loss and obsolescence. The estimates paint an alarming picture and hint to a much larger pool of talent and untapped potential than the 60 million low-educated adults usually referred as low-skilled”,* says the report. ETUC is deeply concerned that the COVID-19 crisis and its economic consequences will contribute to long-term unemployment of many people whose skills will become obsolete during job search. Therefore, **workers and the unemployed urgently need support** not only in accessing upskilling and reskilling trainings, but also **in validating their skills and competences**. As the Council Recommendation of 2012 on NFIL underlined *“The validation of learning outcomes, namely knowledge, skills and competences acquired through non-formal and informal learning can play an important role in enhancing employability and mobility, as well as increasing motivation for lifelong learning, particularly in the case of the socio-economically disadvantaged or the low-qualified.”*

We acknowledge that EU member states have made significant steps to improve their validations systems since the adoption of the Council Recommendation of 2012. 14 countries have improved their validation systems, in 22 countries validation became more accessible, and acquiring qualification through validation it is now possible in 18 countries (as compared to 12 countries in 2012)⁴. These numbers are encouraging, however they also show that the Council Recommendation have not yet been fully implemented in many countries. Governments need to make a greater effort to speed up the process. ETUC is also concerned that only 7 EU countries⁵ have a **specific national budget line** for validation, the others use a decentralised approach and short-term projects to support validation. In order to make validation processes available for all and fully inclusive, they must be free and taken place within public institutions.

³ CEDEFOP: [Empowering adults through upskilling and reskilling pathways. Volume 1: adult population with potential for upskilling and reskilling](#), 02/2020

⁴ [Commission Staff Working Document: Evaluation of the 2012 Council Recommendation on validation of non-formal and informal learning \(2020\)](#) [Commission Staff Working Document: Evaluation of the 2012 Council Recommendation on validation of non-formal and informal learning \(2020\)](#)

⁵ BE, ES, FR, IT, LU, NL, RO

Also, we regret that there is **not enough support provided to the individuals** to validate their skills and competences. The Evaluation report⁶ outlines that many individuals start the validation process without finalising it, primarily because the validation process can be time and energy consuming. In addition in many instances, **paid education leave and /or financial assistance** is not provided for the purpose of validation. ETUC has been advocating that countries should fully implement the **ILO's Paid Educational Leave Convention, 1974** (No. 140), to ensure the right to paid leave to acquire further professional study, to support career development, and for the validation of skills and competences.

Employers need to give their fair share in providing quality and inclusive upskilling and reskilling to their workers, in help them validating their skills and competences, and in recognising their employee trainings. They should also support their workers by providing paid leave to validate their skills and competences. ETUC welcomes that the number of countries where validation is possible via labour market actors (companies, employer organisations, etc) have increased during the last 9 years, but regrets that this is only possible in 17 countries⁷ and not throughout the EU. At the same time, it is important to avoid the misuse of the validation processes by employers as a cheap and rapid method of qualifying their employees. Validation must not be used to keep low-skilled workers as low-qualified. On the contrary, validation should become the initial point for further training of employees.

It is also important to improve the **guidance and counselling** provided to workers and the unemployed informing them on validation processes. As training reps system is an important instrument, the **trade unions** that provide information to workers at shopfloor level about training opportunities need financial assistance to extend their support in this respect. This is essential, especially in the case of support to **“low-skilled” and “low-qualified”** workers who may lack motivation in participating in trainings but who have gained important skills and competences through a long work experience. Knowing in advance that there is the possibility and opportunity to receive effective support to validate skills and competences can be very motivating for such workers to receive further training.

According to the Evaluation report, regrettably, targeted validation support to **migrants and refugees** is primarily available through funded projects and not as part of the normal channels. This is why further support to trade unions is important. These unions, who are members of the UnionMigrantNet, already provide support to migrants and refugees on validation of skills and competences. ETUC and the European Economic and Social Partners have been working on the LABOUR-INT⁸ project to enhance the efforts of the social partners, and other stakeholders, in supporting the recognition and validation of skills and competences of migrants, asylum seekers and refugees. However, setting up **systematic and sustainable systems** supported by the governments should be the ultimate goal.

ETUC is glad that the EQF Advisory Group started to discuss about how to enhance validation strategies in order to better support individuals through the following approaches: 1. Raising awareness; 2. Building trust; 3. Sharing information; 4. Offering guidance and counselling; 5. Facilitating access; 6. Financing validation; 7. Tailoring to individual needs

⁶ [Commission Staff Working Document: Evaluation of the 2012 Council Recommendation on validation of non-formal and informal learning \(2020\)](#)

⁷ [Commission Staff Working Document: Evaluation of the 2012 Council Recommendation on validation of non-formal and informal learning \(2020\)](#)

⁸ <http://www.labour-int.eu/skillsmigration/>

and objectives; 8. Protecting individual rights, 9. Making standards visible; and 10. Ensuring portability and transferability. ETUC has consulted its member organisations⁹ on how these approaches can make validation a reality for the individuals.

As a conclusion, **ETUC is asking the European Commission to enforce the implementation of the Council Recommendation of 20 December 2012, on the validation of non-formal and informal learning (NFIL), with a Council conclusion, respecting national competence on education and training and validation processes.**

1. Raising awareness

Trade unions are well informed about the value of validation of training. Unfortunately, many systems still do not offer a clear understanding on how the validation process works. Such systems also are lacking in ensuring that employers support the validation and recognition of trainings that would lead to full qualifications. Enhancing the **national social dialogue** on validation and recognition procedures is an important tool to raise awareness on the weaknesses of certain national systems on such procedures.

The European Social Partners (ETUC, BusinessEurope, SMEUnited and CEEP/SGI Europe) conducted research on employee training during a 2-year project (2016-18) on Promoting Social Partnership in Employee Training. It transpired that the lack of validation and recognition of employee training, adult learning and work experience are obstacles in motivating adults and workers to attend trainings. Trade unions underlined that national policies on validation and the implementation of the Council Recommendation of 2012 on NFIL can be effective only if they are decided within appropriate **social dialogue** with the social partners. The problem is, however, that social dialogue on validation policies is still weak or lacking in several European countries; even though the Council recommendation of 2012 on NFIL clearly states that trade unions should be involved in the development and implementation of the policy at national level.

The [Joint Recommendation of the European Social Partners](#), which is the final outcome of the social partners' project, highlights that *“Employee training can contribute towards creating a good working environment, which ensures employees’ well-being in their work, motivates them, and enables them to progress in their career and earnings”*. However, career and salary progression happens where there is validation and recognition of the training and is generally defined within a collective agreement. In addition, the *Joint Recommendation* lays down that *“(12) Trade union representatives can play an active role in encouraging workers to take up training and/or benefit from career guidance services, and provide support services to employees for using the potential of validation of non-formal and informal learning. Trade unions should provide their representatives with the appropriate resources and training to do so. Employers should seek to ensure that their **career guidance and HR** support services are available to all workers and that they keep workers informed of training opportunities. (13) Member States, social partners and education and training providers, should design employee training in a way that is based on the learning outcomes approach and that is **compatible with the validation and certification of***

⁹ ETUC Permanent Education and Training Committee members were asked to express their opinion on these topics between 24 November and 4 December 2020. Responses were received from DGB (Germany), GSEE (Greece), CGIL, Cisl and UIL (Italy), FNV (Netherlands), UNIO (Norway), UGT-E (Spain), Saco, LO and TCO (Sweden).

*skills, as defined in national practices and which provides access and help to acquire further and higher qualifications. In addition, non-formal and informal learning should be better acknowledged as part of **career progression and be validated as part of employee training.***”

2. Building trust in validation

Similarly to quality and inclusive education, training and lifelong learning is a right within the **European Pillar of Social Rights**. The right to access quality and inclusive validation and recognition processes should also be guaranteed to all adults, unemployed and workers. Individuals will be more inclined to trust the validation procedures if they know that workers’ unions were involved in the decisions pertaining to the validation processes; if the process is based on agreed **standards and quality assurance**; if there is **transparency of the systems**; and **transferability of certificates** is ensured. The best way to agree on a competence policy and to trust the outcome, is through **effective social dialogue** between government and the social partners, together with a broad cooperation with the training institutions.

The evaluation and accreditation of the professional competences acquired through work experience and through non-formal training is a fundamental action for **social justice**, and an important pillar of lifelong learning. Formal recognition of workers’ qualification, obtained through validation by the company, both in **employment contracts and in collective bargaining**, will help to build trust in the process.

Workers and the unemployed will increase their trust in validation procedures if this leads to **certification by public institutions** or by accredited institutions, and when **social partners** are involved in the validation procedures and assessments. **Assessment procedures** within the validation process need to be quality assured to be lawful, reliable, and objective.

Validation procedures should best be part of the respective national education and qualification system. Validation and recognition systems need to be complementary to the existing **qualification system**, and the certificates and qualifications provided through validation procedures should link to the national qualification framework. This is important as formal qualifications are the reference point whereby employees can be assured that they can utilise the results of the validation. When the validation procedures do not lead to a full qualification, the worker should be informed of the training offer available and how to carry it out in order to obtain a full qualification.

Career guidance and counselling, guidance of training and in-company mentoring (i.e. Unionlearn programs), are basic prerequisite for raising awareness and knowledge of the possibilities available in a validation procedure. To this end, not only **guidance services need to be expanded and standardised**, but it is equally necessary to massively increase the awareness about validation among employers, employees, employment services and schools.

3. Dissemination of information on validation

Workers and employers still have little knowledge about the possibilities that validation offers. Several ETUC member organisations reported that the availability of information on validation processes are often fragmented due to many actors dealing with validation (eg VET institutions, universities, chambers, etc). Such a decentralised approach is not helpful for individuals, especially for the workers and demotivate them from starting validation procedures. This problem could be overcome if public employment services not only provide guidance and counselling for the individuals on continuous VET but also on validation procedures.

Trade unions at the EU, national and local levels can play an important role in offering information about the benefits of validation and can give support to employees in the process. This role needs to be recognised and facilitated by governments.

4. Guidance and counselling before, during and after validation

Guidance and counselling need to be provided at each of the four stages of the validation process described within the Council Recommendation of 2012. Support to individuals before, during and after the assessment and certification process is necessary to meet their expectations, to increase chances to succeed, and to reduce dropouts from the validation process. It is of utmost importance to ensure that **qualified guidance practitioners** have a broad understanding of, and updated information on, validation procedures. Specialised and qualified professionals are a requirement to support individuals during the whole validation process.

Trade unions experiences indicate that **guidance structures are fragmented**, employment services tend to be more job placement-oriented and less qualification-oriented. Guidance during validation depends on the policy in the company and the involvement of trade unions and social partners within the validation systems. Some employers and sectoral social partners are supported by training funds, which means they can organise this process very well. However, **guidance should be ensured as a right for all employees** and its' **quality and inclusiveness** need to be improved. Good information and guidance are important preconditions to make validation fully inclusive, and governments should support this by effective policy and budget.

Regrettably many workers still work in sectors with a weak, or lacking, **social dialogue**, which is an obstacle in ensuring quality guidance and counselling at the workplace. It is essential that employers are encouraged to invest in their workers and that governments ensure for the **national right, and national or regional budget, for guidance and counselling**, for all employees, at all stages in the validation process. ETUC requests for a **European policy to support this by a Council recommendation about guidance and counselling**.

Trade unions can play an important role in the guidance process, because they have the trust of employees and they know how employees need to develop their skills. Several trade unions are supported, either by governments or by the companies, to provide guidance and counselling on available training to workers in the companies, on the validation of such training, and on how to motivate workers to attend these sessions. Nonetheless, trade

unions at the EU, national and local levels need more support to ensure that updated information on the validations procedures reach the workers, and to establish a **trade unions' guidance system (training reps)** in other countries.

Supporting trade unions by the different national or regional administrations of the EU member states through the development of information and orientation projects or public collaboration agreements for workers with financial support, also from European funds, should be a measure to consider.

5. Facilitating access for the individuals

ETUC believes that validation procedures and lifelong learning must be part of a structured **labour market strategy** and governments should ensure that these two policies are linked and that actions are not isolated. **Effective national and company level policies**, and actions that facilitate a better connection between validation and career guidance are needed. This would make full use of validation opportunities, and support the individual throughout the validation path.

Validation should fit, and be thought for, within the overall career aspirations of the individual. There are **restrictions in validating certain professional qualifications**, but possibilities should be broad for everyone to have access to validation, leading to certification and qualifications of all professions and occupations. Some **validation procedures are too complicated and less accessible** for low-qualified workers. Validation procedures should not be time and energy consuming and they should be tailor-made for the individuals. Validation is also useful for allowing access to a VET examination.

6. Financial support to validation

The costs of the validation process is often regulated by a collective agreement or paid by a sectoral training fund. Where this is not the case, individuals have to pay for the procedure (additional trainings, learning materials, exams, access to additional training, certificate, etc) themselves, only a few countries have a national budget to support validation processes according to the Evaluation report. This is unacceptable. It also demotivates, especially the low qualified workers and the unemployed. Therefore, trade unions demand a **sustainable public budget** to cover the cost of the validation procedure and of training, and **effective investment by employers** in their workers' employee training and the validation of their skills and competences.

Individual learning accounts/training vouchers should be allowed to be used for supporting access to validation procedures. In some training funds, or collective agreements, validation is linked to individual learning paths. This practice should be extended to all European countries, as it is an effective and helpful approach for employees to strengthen their position in the labour market.

7. Tailoring the process to individual needs and objectives

National policies need to stimulate and facilitate validation procedures that are flexible and adaptable to specific individual needs. Validation processes should ensure that individuals can get information about the validation process and enter into a process that is tailor-made for their needs. Trainings should be accessible geographically. It should ensure work-life balance. It would be essential to extend the **time and supply** of the validation processes.

Employers (HR) and union representatives should ensure there is appropriate worker-outreach at workplaces. Many employees do not know about the possibilities of validation of their work experience up until it is already too late, for example, when they are at risk of becoming unemployed or about to change the sector. At this stage, however, it is too difficult to organise the validation process.

Validation is most successful when the demand for validation of work experience comes from the employee himself or herself, rather than being "imposed" from above. The employees must be offered **options** to apply for a validation procedure and be informed about the whole process and the outcomes of the validation process.

Clear communication about the value of the certification is important. Governments should ensure and organise **communication campaigns** to raise awareness about the value of validation for the employees, sectors and employers; and the impact of the validation on the career and jobs of the employees. It is also important that governments offer free and independent advice and support for workers.

8. Protecting individual rights during validation

Every adult should have the right to access quality and inclusive validation processes and they should be treated fairly and just during the process. The voluntary nature of the process requires the guarantee of simplicity, accessibility, transparency, objectivity, traceability, confidentiality, methodological correctness, completeness, and fairness of the validation procedures. **A fair, high quality and inclusive** validation process should ensure that individuals achieve the same results under the same conditions. This has to be achieved through the qualification agencies in the context of interinstitutional coordination and in dialogue with the economic and social partners at every level.

ETUC members report that **sometimes validation is used in the process of dismissing an employee**. Therefore, it is essential to regulate the validation process to ensure that it is independent, that the worker is the owner of the results of the validation, and should not be obliged to share the results of the validation with his/her employer. ETUC believes that validation systems should be improved in order to provide targeted support to workers and the unemployed who are **socio-economically disadvantaged**, and to **migrants and refugees** who may need additional help (eg translators) to support the validation processes.

Gender equality should be ensured by supporting female workers and the female unemployed within the validation procedures, taking also into account family responsibilities.

9. Making standards visible for the individuals

Governments must guarantee that validation processes issue **trustworthy certificates**. National guidelines, agreed with the social partners, must indicate, in detail, the minimum standards of the validation procedures. Many standards are sectoral, validation standards need to be designed to work across sectoral borders and between training institutions and the labour market. However, few standards are recognised across sectors, so it would be important to enhance **intersectoral cooperation** with effective policy.

It would be essential to ensure better understanding and cooperation between the education system and the labour market on the validation procedures, with the strong support of **research**. A legal framework should guarantee the participation of the social partners. It should be transparent. It should monitor quality standards of the procedures and the training providers (VET institutions or companies), many of whom issue certificates without having accreditation or respecting quality control. This is the problem of having many organisations providing **micro-credentials**, as underlined it in ETUC **position**.¹⁰

10. Ensuring portability and transferability

In order to support a **just transition** of workers within the labour market and the **freedom of mobility** within Europe, the transferability of certificates needs to be guaranteed. This is possible if the validation procedures ensure that the certificates or qualifications issued at the end of the process link to formal qualifications / occupations. Very often the results of validation lead to a partial qualification requiring further training. Guaranteeing that workers can access this complementary training is particularly necessary for them to obtain their **full qualification**.

Governments should guarantee the **quality assurance** of validation procedures and the proper monitoring of providers, in order to increase trust in the certificates and to make them transferable. Certificates, unfortunately, are still limited in their transferability among sectors and between VET and higher education institutions. Many employees do not know how to use their certificates and what are their opportunities even at the national level. In order to overcome this challenge governments, social partners and relevant stakeholders (eg education institutions) should develop a **common format of learning outcomes and agree on recognition of certificates and degrees** at national level, and between institutions and sectors.

¹⁰ [Joint ETUC – ETUCE Position on Micro-credentials in VET and tertiary education, 2020](#)