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VALIDATION OF NON-FORMAL AND INFORMAL LEARNING IN THE EU NEIGHBOURING COUNTRIES AND CENTRAL ASIA

A cross-country analysis report

THE EU AGENCY SUPPORTING COUNTRIES • TO DEVELOP THROUGH LEARNING

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PREFACE

This report was produced under the Inventory on Validation of Non-Formal and Informal Learning (VNFIL) in 16 ETF Partner countries. The study project was coordinated by Maria Rosenstock. The information was produced and updated at several stages: in 2018, ETF carried out monitoring of VNFIL in 3 Western Balkan countries (Kosovo*, Montenegro and North Macedonia) and Türkiye. In 2021, it conducted a cross-country study in another 5 countries: Azerbaijan, Georgia, Jordan, Moldova and Ukraine. Finally, in 2023, this exercise was extended to cover a total of 16 countries, including updated information from the above (9) countries and an additional 7 countries: Albania, Bosnia and Herzegovina, Kazakhstan, Kyrgyzstan, Morocco, Serbia and Tunisia.

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The report benefited from additional input from ETF experts Maria Rosenstock, ETF Human Capacity Development Expert and Coordinator for Qualifications, and Arjen Deij, ETF Senior Human Capital Development Expert. In addition, it was peer-reviewed by Cristina Mereuta, ETF Senior Human Capital Expert, and Anna Kahlson, Senior Advisor at the Swedish National Agency for Higher Vocational Education (MYH).

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* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence. Herein after 'Kosovo'.

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Introduction

Validation of non-formal and informal learning (VNFIL, hereinafter referred to as 'validation') is an essential element of lifelong learning policies, which supports the creation of new pathways and progression routes, elimination of dead-ends in education and recognising the importance of authentic experiential learning as a valid alternative to classroom settings. Validation can help with fulfilling people's potential by valuing and bringing to light all learning an individual has undertaken throughout their life with the aim of improving knowledge, skills/competences and/or qualifications for personal, social and/or professional reasons.

Most of the ETF Partner Countries are working on setting up validation arrangements, often inspired by the European policies and practices in this area.

In 2018 ETF started to monitor VNFIL systematically in the framework of the European Inventory on validation.[1] In 2021 ETF made VNFIL one of the priorities in the modernisation of qualification systems and decided to monitor VNFIL in all Partner Countries where there was a significant development in this field. In 2021 ETF carried out a cross-country study on validation in 5 countries: Azerbaijan, Georgia, Jordan, Moldova and Ukraine.[2] In 2023, this exercise was extended to cover a total of 16 countries, including updated information from the above 5 countries and an additional 11 countries: Albania, Bosnia and Herzegovina, Kosovo, Kazakhstan, Kyrgyzstan, Montenegro, Morocco, North Macedonia, Serbia, Tunisia and Türkiye. The ultimate goal of such endeavour is to support Partner Countries to boost cross-country learning and exchanges, identify priorities for implementation of validation, address challenges, re-focus policies and guide international cooperation projects including the ETF policy advice activities.

The aim of this study is to take stock of the state of play of validation of non-formal and informal learning in ETF Partner Countries and perform a cross-country analysis using a common methodology that is also used for EU Member States.

Based on study results, this executive summary provides information on key findings regarding features of validation schemes and recommendations.

Features of validation systems

Sectoral initiatives, **arrangements and practices in selected numbers of qualifications still prevail.** Although ETF Partner Countries have made variable progress in adopting and using validation arrangements, these are characterised by approaches focused on selected sectors and a small number of qualifications and are therefore not included in a single comprehensive mechanism for recognising competences obtained through non-formal and informal learning. In this context, it is too early to speak of VNFIL systems and national approaches as such and is more precise to highlight the prevalence of validation arrangements.

While the **adoption of relevant legislation** (including overarching laws as well as by-laws) is a key enabler for the implementation of validation, it does not necessarily ensure its wider usage. At the same time, the absence of more detailed, executive regulations that provide for the implementation of validation in some cases act as a veritable stumbling block to the development and implementation of validation arrangements. The majority of countries explored have already adopted detailed legislation related to validation (Azerbaijan, Georgia, Kazakhstan, Kosovo, Moldova, Montenegro, Serbia, Türkiye and Ukraine), but significant progress in terms of usage (increased number of beneficiaries) has only been observed in three of them (Moldova, Türkiye and Ukraine) in the last few years.

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[1] https://www.cedefop.europa.eu/en/projects/validation-non-formal-and-informal-learning/european-inventory
[2] https://www.etf.europa.eu/en/document-attachments/validation-non-formal-and-informal-learning-eu-neighbourhood

At system level, a clear **link between validation of non-formal and informal learning and other relevant policies and initiatives** (related to upskilling and reskilling, economic development, migration, active labour market programmes, social inclusion) is often still missing. Such a link is a key aspect for the sustainability of validation initiatives and their integration into existing systems. Kosovo provides a noteworthy example by introducing validation as an additional labour market measure for jobseekers, while Moldova uses validation as a re-integration measure for returned migrants. Jordan and Türkiye make use of validation as a social inclusion measure for migrants and refugees.

In the majority of countries and to varying degrees, the assessment and certification stages[3] are likely to be emphasised while identification and documentation – which are more closely related to career guidance provision – are less so. In this context, **putting the focus on the individual, reaching out to different target groups, considering their needs and circumstances and helping them fully benefit from validation service seems to be a challenge**.

For validation providers, a key issue is the **lack of a business model for validation,** in the sense that it is a challenge for them to provide validation services as part of a sustainable funding concept**.** This may partly stem from uncertainties regarding their target groups, the reasons people might seek validation and how the validation process is financially supported. In most cases, validation providers find themselves solely responsible for organising the validation process, including building partnerships, organising funding, assuring a quality service and reaching out to the candidates.

Financing and access to validation often form a serious impediment to participation accompanied by limited possibilities for support to individuals. In some countries, validation is employer dependent while in other countries candidates face high fees. Furthermore, the allocation of funding (at system level) for complementary courses is largely missing.

In some countries, the accreditation of validation providers includes **lengthy and burdensome procedures** that require passing through several instances. These procedures are geared towards making the accreditation process more quality assured and trusted, thus avoiding potential cases of corruption and abuse. However, the measures taken may also sometimes have negative effects potentially leading to costlier validation services for individuals or a decrease in the number of validation providers applying for accreditation.

In terms of beneficiaries**, some countries are succeeding in getting initiatives off the ground that reach many people**. Noteworthy examples can be observed in Türkiye, Jordan, Ukraine, Moldova, Montenegro and Kazakhstan. At the same time, several countries are not yet able to start pilots or visibly struggle to move beyond them. There is evidence for under-reporting of outcomes of validation procedures (i.e. cases are not documented) in general education (extramural exams), adult education and the third sector (e.g. validation initiatives carried out by youth organisations, volunteering organisations, NGOs and/or organisations supporting migrants, refugees, etc.)

In most of the countries examined, a common challenge lies in the **lack of trust** among education institutions and employers in the outcomes of validation processes. Additionally, there is a pressing **need for comprehensive and precisely targeted awareness campaigns** to communicate the advantages of validation to individuals who may currently have a limited understanding of these benefits.

Recommendations

- **Long-lasting political commitment** – the implementation of validation needs continuous political commitment. It may be that a country has an elaborate validation system including developed draft laws, a methodological framework, guidelines, etc. However, without political commitment the use of validation remains fragmented and unsystematic and therefore the respective impact is limited.

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[3] In the European context, validation of non-formal and informal learning is generally described in four phases – identification, documentation, assessment and certification – according to which the concept of validation is adapted to different contexts and purposes. Depending on the objective of the validation process, certain phases will be more emphasised than others. Some validation initiatives may only include some of the four stages.

- **Complete legislative framework** – in a minority of countries (e.g. Bosnia and Herzegovina, Jordan, Morocco, North Macedonia, Tunisia) the absence of legislation, including necessary by-laws, impedes the development and implementation of validation arrangements.

- **Identify who can benefit from validation and how** – in relation to the centrality of the individual in validation processes, there is still room for improvement in the 16 ETF Partner Countries studied. This can be achieved through clarifying the target groups for validation, better understanding their needs and circumstances through the use of career guidance services, user-friendly processes and additional support measures, such as access to adequate complementary training.

- **Move beyond a single initiative in one sector only** – all countries examined have sectoral approaches to implementing validation covering one or several sectors (typically, VET and the labour market) but none of them has a comprehensive approach for all the sectors.

- **Link validation to other national policies** – validation can be linked to social and economic policies and to economic sector development policies that target upskilling and reskilling. It can be considered as an active labour market measure, as a tool in migration management or in measures targeting economy formalisation. In the context of youth policies, the voluntary engagement of young people can be recognised. Linking with other policies can secure additional funding sources for validation and a pool of partners who can join the efforts of publicising the service among the various potential groups of validation candidates.

- **Mobilise diversified funding for validation** – all the countries reviewed lack a dedicated, sufficient and sustainable funding model for validation services and further system development. In most cases studied, the costs of the validation procedure are covered by the applicant, which may be a barrier to accessing validation.

- **Design and implement complementary training** – validation should serve as one of the instruments used to close the dead ends in the education system. For this to happen, the training providers need to be supported and incentivised to offer courses of various lengths and to accommodate flexible learning pathways.

- **Start relying on strong, trustworthy institutions** – given that the ETF Partner Countries analysed share a common challenge that relates to the general lack of trust in the outcomes of the validation processes, it is crucial that the validation providers selected to act as frontrunners in validation services are strong and trustworthy institutions. Consider the potential role of Centres of Vocational Excellence in popularising validation.

- **Build on the pilot activities rolled out during targeted awareness campaigns.**

- **Build quality assurance mechanisms that generate trust in validation but do not discourage participation** – quality assurance that can convince stakeholders may focus on the following aspects:
  - finding the right balance between providers' accreditation that is quality assured and accreditation procedures that are not too complex.
  - developing relevant job profiles of validation practitioners in the field of career guidance and assessment.
  - continuously improving validation services based on beneficiaries' surveys and provision of training opportunities for practitioners involved in validation procedures.
  - ensuring the quality of validation methods used.

- **Take advantage of IT and digitalisation** – although some countries have reported using digital tools to support validation (e.g. in the form of online registration of candidates, examination through online tests), further opportunities can be explored.

- **Collect feedback and systematically monitor the results** – the countries explored do not have a systematic approach to data collection, monitoring and evaluation in the field of validation, thus

making it difficult to gain a precise picture of the extent to which validation is implemented, how this has changed over time and what can be improved.

1. Introduction

1.1   A role of validation in the ETF Partner Countries

ETF Partner Countries face challenges in reforming their education and labour market systems marked by qualifications deficits, skills mismatches and scarce lifelong learning opportunities for adults. In some regions, this situation is exacerbated by a declining youth population. This pressures the policymakers to work on strategies and systems that will allow them to make maximum use of the existing skills of young people and adults. The need to attract foreign investment and to generate attractive employment opportunities calls for enhanced skill levels of the population. In light of the digital and green transitions, validation can make reskilling and upskilling faster and cheaper by making use of skills that people already have. It can support the creation of new pathways and progression routes and eliminate dead ends.

For individuals, validation can help with fulfilling people's potential by valuing and bringing to light all the learning an individual has undertaken throughout their life for personal, social and/or professional reasons.

Among ETF Partner Countries, many are working towards initiating or further developing arrangements for the validation of non-formal and informal learning. To a certain extent, these developments are also inspired by European developments and policies, in particular the 2012 Council Recommendation on the validation of non-formal and informal learning[4].

1.2   EU policy framework related to validation

In the EU policy framework underpinning the development and use of validation arrangements, several milestones play a pivotal role. The establishment of the **European Qualifications Framework (EQF)** 15 years ago as a translation device between the National Qualifications Frameworks (NQFs) of participating countries highlights the link between NQFs based on learning outcomes and validation of non-formal and informal learning. The **2012 Council Recommendation on validation of non-formal and informal learning** further enhances this link through the formulation of general principles that Member States need to consider when implementing validation arrangements, for instance, to establish links between VNFIL and NQFs and thereby offer certificates that have NQF levels on them. Other general principles refer to:

- targeting disadvantaged groups who are very likely to benefit from validation, like unemployed people or those at risk of unemployment (including workers who have experienced informal employment or have worked abroad), low-qualified adults and young people (NEETs), migrants, refugees, asylum seekers, school and training dropouts or people with disabilities;

- providing information and guidance to validation candidates;

- using transparent quality assurance (QA) measures such as reliable, valid and credible assessment procedures;

- assuring the development of professional competences of practitioners involved in VNFIL.

The European Pillar of Social Rights (2018) promotes a strong social Europe that is fair, inclusive and full of opportunity. It states that everyone has the right to quality and inclusive education, training and lifelong learning in order to maintain and acquire skills that enable them to fully participate in society and successfully manage transitions in the labour market. European Union Member States agreed that 60% of adults should be participating in learning by 2030. In order to reach out to everyone, strategies for upskilling and reskilling must increasingly consider all prior learning, irrespective of when and where skills were acquired. The COVID-19 crisis fundamentally changed the way we work and learn and showed how important it is to adapt to rapidly changing situations. The

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

European Skills Agenda 2020 is accompanied by actions supporting people in developing skills for life that encompass validation, including initiatives related to Upskilling Pathways, Individual Learning Accounts and Micro-credentials. In the post-COVID-19 restructuring, the EU policy framework has changed its priorities through setting goals which are much more focused on adult learning, upskilling and reskilling. According to Eurostat, more than 75% of EU companies already struggle to find professionals with the necessary skills to fill job vacancies. At the same time, many migrants coming from outside the EU work below their potential qualification level because their diplomas and skills are not recognised. Offering wider access to validation and streamlining recognition are needed to make people's skills visible and avoid human capital waste/underutilisation.

1.2   Aim and scope of the cross-country report

The aim of this report is to take stock of the state of play of validation arrangements in ETF Partner Countries and perform a cross-country analysis using a common methodology that is also similar to the methodology used for EU Member States. This will help ETF to establish a baseline for monitoring progress in the development of validation.

The cross-country report covers 16 ETF Partner Countries: in 2018, ETF carried out monitoring of VNFIL in 3 Western Balkan countries (Kosovo, Montenegro and North Macedonia) and Türkiye. In 2021, it conducted a cross-country study in 5 countries: Azerbaijan, Georgia, Jordan, Moldova and Ukraine. In 2023, this exercise was extended to cover a total of 16 countries, including updated information from the above (9) countries and an additional 7 countries: Albania, Bosnia and Herzegovina, Kazakhstan, Kyrgyzstan, Morocco, Serbia and Tunisia.

The structure of the analysis reflects the analytical framework developed for the ETF VNFIL Inventory 2022–2023 and agreed in advance of the data collection process (see box below).

Aspects covered by the ETF VNFIL Inventory analytical framework (2022–2023)

National context: VNFIL policy objectives, target groups, regulatory framework, overarching approach (identification of link between VNFIL and other policy initiatives and practices if existing) and extent of implementation / progress made over time, especially in countries where national reports have already been produced.

Reforms of NQS and their implication for VNFIL: e.g. identification of qualifications for which the VNFIL services are available.

Institutional setup: responsibilities such as whether or not there is sufficient information and collaboration between stakeholders; whether awareness-raising initiatives have taken place at the early stage of VNFIL development.

The perspective of the validation providers: e.g. who are the validation providers; extent to which the needs of validation providers have been clarified; whether or not validation providers have access to financial incentives enabling them to offer validation services for all citizens/specific target groups (vulnerable people).

Profile of practitioners.

Information and guidance.

Validation methods: focusing on typical validation processes including the extent to which digital tools are used.

Quality assurance mechanisms: e.g. extent to which practitioners have access to initial and continuous training; existence and use of QA guidelines or similar documents; use of feedback-loops.

Funding arrangements: including the role of international support.

Beneficiaries and monitoring of outcomes: key characteristics and statistics regarding beneficiaries, the extent to which validation services are used, their effects on individuals (in particular its role in facilitating further learning and labour market outcomes).

Position of validation in society.

> **Recommendations:** these are based on the analysis of factors influencing the development and evolution of VNFIL systems.

The analytical framework was developed by the study team to be coherent with the updated analytical framework of the European Inventory (i.e. in terms of areas, stages and aspects of validation to be covered). However, the ETF Inventory has some additional dimensions such as the perspective of validation providers. The additional dimensions are explained with the policy advice function of the Agency. The latter is reflected in the overall objective of the current report: *to inform further policy and operational decisions in the ETF Partner Countries covered and support their progress towards VNFIL implementation.*

1.3   Terminology

According to the 2012 EU Council Recommendation on the validation of non-formal and informal learning, the term validation is *'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: identification, documentation, assessment and certification.'*

The terms 'non-formal learning' and 'informal learning' do not fully match with the terms used by ETF Partner Countries. For instance, some of them use synonyms or related terms such as self-learning, spontaneous learning, upskilling, reskilling or work-based learning. The ETF cross-country report on VNFIL in the EU Neighbourhood (ETF 2022) identified some discrepancies in the use of the terms 'non-formal' and 'informal': in Georgia, for example, the term non-formal includes both non-formal and informal learning, whereas in some countries there is no definitive term for the word 'learning', so 'informal learning' is referred to as 'informal education', which contradicts the meaning in English.

Looking at legislative documents, the term 'validation' is not used literally in a range of countries such as Azerbaijan, Morocco, Tunisia and Ukraine. It may be used interchangeably with 'recognition of prior learning', 'recognition of non-formal education', 'certification', 'confirmation', 'attestation' or 'assessment'. Some of these terms are broader and other narrower than validation. For example, 'recognition of prior learning' is broader since it refers to the process for recognising learning that has come from experience and/or previous formal, non-formal and informal learning contexts. Therefore, validation is a form of recognition of prior learning. 'Assessment' and 'certification' are narrower as they mean specific stages of a validation procedure.

For the purposes of the study, we will use the term 'validation of non-formal and informal learning' (hereafter VNFIL or validation) as an umbrella term that collects all possible variants of the phenomenon observed.

2. Analysis of findings

The cross-country analysis covers countries from different regions: Western Balkans (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia and Türkiye), Central Asia (Kazakhstan and Kyrgyzstan), EaP (Azerbaijan, Georgia, Moldova and Ukraine) and the Southern and Eastern Mediterranean (Jordan, Morocco and Tunisia). Therefore, one methodological approach could have been to compare countries by regions, however evidence from data collected shows that there are no strong regional patterns. Furthermore, common 'pushing' factors are likely to lead to different approaches to VNFIL depending on countries' contexts and validation needs.

There are certainly common features shared by countries from the same region, though these cannot be considered regional patterns since they are also observed elsewhere. For instance, Eastern Partnership countries – Azerbaijan, Georgia, Moldova and Ukraine – have a different approach to VNFIL. Despite this, a common feature is the stronger availability of extramural exams in general adult education. The latter is not a typical validation procedure since identification, documentation and guidance are minimal, but it is important to consider it as extramural exams cater to many people – in Georgia, for example, more than 3000 persons aged 19 and above were certified between 2016 and 2021. There may be similar figures in other Eastern European countries as the extramural exams ('*eksternat*') have been an established form of assessing knowledge and skills of young people who did not participate in regular educational programmes; however, these developments are often not monitored – there are no statistics on VNFIL activities in general education in Ukraine, for example.

In addition to exploring the availability of regional patterns, another angle of comparison relates to the extent to which countries implement VNFIL procedures, considering indicators such as coverage (sectors where validation arrangements are under development or implemented), number of beneficiaries / certificates issued or the number of validation providers. Elaborating on this perspective will be our main analytical approach for this report, which will also allow us to consider progress made over time in relation to countries that the ETF VNFIL Inventory covers for the second time: Kosovo, Montenegro, North Macedonia and Türkiye.

The main limitation of this approach concerns existing data gaps on validation statistics and trends in the countries analysed, which will have an implication on providing a complete picture on the extent of VNFIL implementation. In addition, data is hardly comparable since countries use different definitions of validation for the same sector (e.g. labour market) or sub-sector of education: general education, initial and continuous vocational education, higher education and adult education.

2.1   The national perspective: overarching approach to VNFIL

This section provides an overview on developments in terms of legislation and policies and explains the economic and political background influencing VNFIL, what their regulatory frameworks around VNFIL look like and the state-of-play of actual VNFIL implementation. It also focusses on progress made since 2018 in those four countries which already formed part of the ETF Inventory in that year (Kosovo, Montenegro, North Macedonia and Türkiye). The section also explores links with other economic and political developments, such as migration flows.

Of note is that some countries have a higher share of informal ('grey') economy (e.g. in Kazakhstan and Kyrgyzstan, Bosnia and Herzegovina, Kosovo, Albania, Tunisia and Morocco), or increased migration inflows (Jordan, Türkiye) which also includes return migration (e.g. Bosnia and Herzegovina, Kazakhstan, Kyrgyzstan, Moldova and Morocco), which increases the need for introducing validation arrangements.

One main finding is that while countries differ in the level of implementation of VNFIL, they are relatively united in having mainly sector-specific validation arrangements in place, usually covering VET and/or the labour market (see table below). The prevalence of sector-specific approaches is linked to the fact that the different sectors often have different legislation in place, they deal with different stakeholders and often also have different incentives for validation (e.g. shortage of qualified

staff on the labour market versus legislative frameworks focusing more on formal professional qualifications in vocational education and training). Development and implementation of national overarching frameworks may therefore take quite some time as compared to sectoral approaches.

Another central finding is that countries advance at different speeds in the use of validation and this may relate to different reasons. For example, we must distinguish between legal arrangements on a system (policy objective) level and legal arrangements that specifically regulate VNFIL procedures in a given sector, such as defining who the providers are, how they are authorised to certify people based on VNFIL, etc. The majority of countries already have some statements in higher level laws or national strategies which provide for validation in several sectors, or at least do not limit validation to one sector only; however, the elaboration and adoption of by-laws regulating validation procedures is likely to be more time-consuming, being subject to social dialogue and political agreement. For instance, Albania and Bosnia and Herzegovina need to draft detailed regulations in order to start the provision of validation services in at least one sector.

In the period between 2018 and 2023, North Macedonia conceptualised an overarching regulatory framework, developed guidelines and conducted validation pilots, however wider implementation of VNFIL has been hampered due to delays in the adoption of specific regulations. In comparison, Kosovo has made progress since 2018 as validation procedures are implemented in the VET sector and there are real beneficiaries. It shall be noted, however, that the VNFIL policy framework in Kosovo is much broader than VET since it does not limit levels of qualification that can or cannot be acquired through validation. Furthermore, the 2020 NQF Handbook allows for validation for all types of qualifications up to level 7 of the Kosovo Qualifications Framework. In Moldova, validation has been successfully piloted for several years, which has led to the adoption of a regulatory framework for validation providers in VET. Service provision was then extended nationwide and rolled out with regulatory acts for higher education now underway.

While in most countries validation is practically used in at least one or two sectors, Türkiye and Ukraine are examples of more overarching approaches in practical terms: in both countries, procedures are now introduced in the labour market, general education, VET and higher education (although data is not publicly available).

The overview table below provides some insight on developments in each of the educational and labour market sectors in those countries where information is available.[5] Data refers to the number of certificates issued per year on average for a given reporting period whereby we use ranges to present this data. In our view, using absolute numbers is misleading as there is no comparative basis between country specific data. Moreover, data depicts different reference periods. Another option would have been to use relative indicators such as number of certificates issued as shares, however this is not recommended due to the low sensitivity of the indicator for measuring progress over time – shares are less attuned to depict small (in terms of volume) developments which are typically observed in the case of validation. Given that the ETF VNFIL Inventory plans to track the progress of countries with some regularity, it is important to keep track of available data.

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[5] Data on the third sector is not available, which does not mean that there are no initiatives, but that developments in this sector cannot be captured.

Table 1 Development of validation arrangements by sectors – number of certificates issued per year on average

Country	Reporting period	GE	VET	HE	AE	LM	Population aged 15-64 in millions (2022)*
Albania	2022-23						1.87
Azerbaijan	2020-21	n.a.	<100			n.a.	7.04
	2020-23	n.a.	<100			n.a.	
Bosnia and Herzegovina	2022-23						2.16
Georgia	2016-21	>500	n.a.	<100		n.a.	2.38
	2022	>500	<100	<100		n.a.	
Jordan	2016-21					>1000	7.23
Kazakhstan	2022-23	n.a.	n.a.	n.a.		>1000	12.22
Kosovo	2017-18						1.21
	2019-22		<100			n.a.	
Kyrgyzstan	2022-24	n.a.	n.a.	n.a.	n.a.	100-500	4.26
Moldova	2020	n.a.	<100			n.a.	1.72
	2019-23	n.a.	100-500			n.a.	
Montenegro	2014-16		100-500			n.a.	0.40
	2019-22		100-500	<100	100-500	n.a.	
Morocco	2019-23			<100		100-500	24.61
North Macedonia	2017-18						1.42
	2022-23						
Serbia	2022-23				n.a.		4.33
Türkiye	2016-18		n.a.	<100		>1000**	57.90
	2016-22	n.a.	n.a.	<100		>1000**	
Tunisia	2022-23		n.a.		n.a.	n.a.	8.17
Ukraine	2016-21	n.a.	n.a.			100-500	24.99
	2021-23	n.a.	n.a.	n.a.		>500	

Source: Study team based VNFIL country reports and updates, *World Bank Database
GE = general education; VET = vocational education and training; HE = higher education; AE = adult education; LM = labour market

    validation arrangements are not oprational.
n.a.   there is evidence on existing practices, but data is not reported as it is not publicly available, collected or monitored.

2.2 VNFIL in the Education and Training sector

This section is divided into sub-sections covering all education and training sectors: general education (GE), initial and continuous vocational education and training (IVET and CVET), higher education (HE) and adult education (AE).

For each of the sub-sections, country comparisons are made for those of the countries that already have operational validation arrangements. Countries with arrangements under development are also taken into account.

One of the key findings is that operational validation arrangements in IVET and CVET are encountered most frequently, which may be due to their link with labour market access. Validation arrangements in HE which do not touch upon recognition of formal education, but really focus on non-formal and informal learning, are relatively rare. Validation in adult education often closely links to CVET or labour market initiatives, while validation in General Education is mentioned mainly in the context of extramural examinations.

General Education

There has been a tradition of extramural exams for general education (*eksternat*) in Eastern European countries (Azerbaijan, Georgia, Kazakhstan, Kyrgyzstan, Moldova, Ukraine) which have been an established form of assessing the knowledge and skills of young people who did not participate in regular general education programmes. Statistics on this form of validation, however, are usually not publicly available, with few exceptions.

In Azerbaijan, the application of the free (external) form of education aims to create conditions for those who could not complete the general secondary or full secondary education level for various reasons (except health reasons) to take the final exam for those levels and receive the appropriate educational certificate. Of note is that the word 'externally' is added before the word 'graduated' in the validation document received.[6]

The 2005 Law on General Education in Georgia establishes certification of education acquired through external studies/externship. It allows applicants to get their learning outcomes assessed and validated for general education programmes of targeted subjects, whole grades or even a whole general education cycle. Assessment is performed through written examination. Georgia keeps statistics on certifications acquired through externships and is thus an exception compared to the other Eastern European countries.

In Kyrgyzstan, validation in general is reported to be 'an extreme variant of the individual learning curriculum […] where the applicant does not attend the programme at all. In such a case it is necessary to undergo checkpoints, mid-term and final assessments based on the knowledge and skills acquired in any way outside the formal organisation.'

In Moldova, a national baccalaureate examination is open to persons aged 19+ who are graduates of general secondary school, graduates of VET school with three years of study duration, persons who have at least two years of high school with completed schooling (grade X-XI), graduates of colleges and students of higher education institutions who were admitted to study on the basis of the general secondary school certificate. Candidates who have been admitted to the programme sit the 'difference' tests to certify their level of mastery of all the subjects in the Secondary Education Framework Plan.

In Türkiye, there are also validation practices in general education, however data is not publicly available.

In Ukraine, according to the law on general education, a student has the right to the recognition of learning outcomes from non-formal or informal learning within the educational programme that is provided by the general educational institution. Recognition of such student's learning outcomes is carried out through the annual assessment or state final certifications, which are conducted on a general basis, defined for full-time or part-time form of general secondary education.

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[6] Further information available at: https://edu.gov.az/uploads/xususi-tehsil/Eksternat-Qaydalar.pdf

Vocational education and training

One of the main findings of this cross-country research is that operational validation arrangements are most frequent in areas of IVET and CVET, with 11 (IVET) to 12 (CVET) of the 16 countries having validation arrangements in place. This may be due to their strong link to the labour market, often enabling labour market access, upskilling and reskilling. The scale of implementation varies, however. The extent of participation in the various validation schemes can be seen in the table above. It is highest in Moldova and Montenegro.

Brief update of VNFIL country report of Moldova

'…The period between 2019 and December 2022 was seen as a pilot phase for validation, with nine training centres (VET Colleges and Centres of Excellence) involved as validation service providers. The policies and practices during that time were reviewed and followed by a set of recommendations. These recommendations highlighted the need to extend the ministerial order approving the existing validation regulations beyond the pilot phase, with the goal of introducing validation as a permanent feature in the Moldovan qualifications system. Following this recommendation, the key regulatory change was the approval, in September 2022, of the "Regulation on the certification of professional skills corresponding to level 3, 4 and 5 qualifications under the National Framework of Qualifications". This regulation extended the implementation of validation services nationwide.

Moldova made good progress in expanding access to validation services. New centres have been authorised to provide validation services, currently being offered in 13 locations and for 92 occupations…'

Source: VNFIL country report on Moldova, 2023 update.

In Montenegro, while the VNFIL system is officially designed to enable validation in all sectors of education and training, the actual focus clearly lies on vocational qualifications in secondary and tertiary education. For example, it is possible to attain vocational qualifications through a validation process. Uptake has been high, with 250 to 350 certificates issued each year between 2019 and 2022.

Other countries with validation arrangements in VET include Azerbaijan, Georgia and Kosovo, although participation is lower as compared to Moldova and Montenegro.

In Türkiye, the VET sector is prioritised since there is a great need for workers to obtain qualifications which recognise their skills and provide evidence of these. This is also important for employers to be able to show that they have a qualified workforce. Currently, validation processes only concern work-based vocational education (journeyman and mastery).

In Ukraine, an admission control procedure (*вхідний контроль*) has been developed, adopted and implemented since 2014. It allows training institutions which also provide opportunities for professional upskilling and reskilling to shorten training periods of incoming students based on experience. Although there is no central system to monitor implementation, many online examples can be found from VET institutions and regional methodological centres meaning that this practice is likely to be quite widespread.

In a couple of countries, validation in VET has been prioritised, however arrangements are still not implemented due to various reasons. In Albania, legislative framework was adopted which states that VNFIL arrangements will adhere to the four stages of validation: identification, documentation, assessment and certification. In Bosnia and Herzegovina, validation in VET has not been legally regulated, but there is a strategic document: 'Enhancing the Quality and Pertinence of Vocational Education and Training in Bosnia and Herzegovina – Building on the Findings from Riga – 2021-2030', which stipulates that until 2030 there should be regular procedures in place for recognition of non-formal and informal education and self-directed learning, as well as for defining the responsibilities involved in the recognition process.

To promote the concept of VNFIL in education, in August 2023 the Kyrgyz Government adopted the Regulation on the establishment of the 'Centre for Independent Certification and Validation' under the Ministry of Education and Science, which should carry out activities aimed at improving the quality of

vocational education in the Kyrgyz Republic through independent assessment of skills/qualifications and recognition of non-formal learning – the validation of informal learning is excluded for the moment.

Higher Education

In higher education, validation is usually decentralised and mostly determined by institutional arrangements at provider level, which can be linked to the higher autonomy often given to higher education institutions (as compared to providers of general education and VET).

An exception is the case of Georgia where the approach seems to be more centralised: The National Center for Educational Quality Enhancement (NCEQE)[7] is entitled to recognise and validate learning and qualifications obtained beyond the formal higher education system. Normally, the process involves: a) verification of the learning and qualifications[8], and/or b) assessment and validation of learning outcomes and/or recognition and validation of learning outcomes within formal higher education or qualification.[9]

In Kyrgyzstan, validation arrangements in higher education are usually not documented. There are very rare cases where validation is mentioned (but not described) as confirmation of knowledge and skills in the regulation documents on the organisation of the educational process (e.g. Kyrgyz State Technical University). Validation is often used by students when they change their specialty, institutions or work and study somewhere else. For instance, students can apply for recognition based on certificates of completion of external courses (e.g. foreign language, IT) or on evidence for skills acquired through work (especially if they study tourism or hospitality).

In Türkiye, some universities have arrangements at institutional level, authorised by their respective Senates. The basic principles of VNFIL are described in the Higher Education Law, but details on the implementation of the process are devolved to the senates of universities.

In Ukraine, validation in higher education is carried out as recognition of learning outcomes provided by the accredited educational (educational-professional, educational-scientific) programme, in accordance with the standard of higher education and the National Qualifications Framework. For the last two years, several higher education institutions have implemented VNFIL initiatives and developed internal regulations on the recognition of learning outcomes acquired through non-formal / informal learning.[10] Currently, a number of higher education providers validate international certificates in foreign languages (mainly English, German and French).

Some countries (e.g. Bosnia and Herzegovina, Montenegro, Morocco and Tunisia) have so far only carried out pilots regarding validation in higher education.

In Bosnia and Herzegovina, an initiative related to higher education has been implemented within the EU-funded project 'Education for Employment'. It focused on the recognition of previously acquired knowledge, skills and competences for the purpose of acquiring a certain number of ECTS. The procedures have been developed, a legislative model has been created and the pilot phase at two higher education institutions is expected to start soon.

In Montenegro, HEIs can carry out assessments and award vocational qualifications at MQF levels 6-8 based on the special training programmes accredited by the Higher Education Council, in accordance with the Act of the Higher Education institution. VNFIL is, however, a rare exception. An Erasmus+

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[7] NCEQE carries out authorisation of educational institutions and accreditation of educational programmes, as well as monitoring implementation of authorisation and accreditation standards.

[8] The verification process is mostly applied for the recognition of education and qualifications acquired in the Occupied Territories of Georgia or for refugees and asylum seekers, and consists of submission of relevant documentation attesting to the existence of learning processes and/or learning outcomes and qualifications, interviewing witnesses and in some cases testing through examinations.

[9] Identification of transferable learning outcomes, assessment, recognition and validation is applied for the students/graduates of 'Licensed HE Institutions'. The process is still administered by NCEQE, however with a more active role for HE institutions. In this process HE institution representatives are involved within the recognition commission and perform content analysis of the learning outcomes, decide on the examination content, prepare and administer examinations and recognise learning outcomes.

[10] An example is available at: https://kpi.ua/en/informal-education

ETF Working together Learning for life
European Training Foundation

project (e-VIVA) aimed to combine HE and professional practice to improve validation opportunities through ICT-based methods of self-assessment and testing.

In Morocco, the AMEL Project has the objective to award the exact same qualifications as those currently awarded at the end of a learning programme in a formal setting, but this system is not yet operational. For now, the AMEL Project has experimented with its approach during two sessions – in November 2022 and February 2023 – by awarding qualifications from its French partner CNAM (*Conservatoire national des arts et métiers*, a French HE institution dedicated to LLL).

In Tunisia, private universities offered validation in the process of career guidance. Another Tunisian university has launched validation in cooperation with a French higher education institution, offering equivalence to a university diploma through a certified validation process, but it did not lead to concrete results.

In other countries, recognition of prior learning focuses mainly on formal qualifications rather than on actual non-formal or informal learning (e.g. work experience), and is sometimes linked to modularisation with the general goal of increasing permeability (Montenegro).

Adult Education

Adult education has different forms and adults may be included in the target group(s) of validation services in general education, CVET and acquisition of key competences, and therefore must be distinguished. For instance, in the case of general education, validation candidates (including adults) aim to acquire a certificate for completed general education (or general education subjects); in CVET, candidates aim at acquiring a professional qualification. This section focuses on the validation of key competences acquired by adults (literacy skills, foreign languages, digital competences, etc.), which do not lead to the acquisition of a certificate for completed general education (subjects) or professional qualification. The distinction is used for the purposes of the current report and do not necessarily comply with national definitions – in some countries, adult education is conceptualised very broadly, including all learning activities of adults (e.g. Serbia). In the example of Bosnia and Herzegovina below, adult education is linked to CVET. Also of note is that very often statistics on validation initiatives in adult education (e.g. key competences) are not publicly available.

In the Western Balkans, andragogy was a relatively independent branch of studies at universities and linked with well-developed adult education practices. Therefore, the conceptualisation of VNFIL in these countries is often linked to adult education policies, laws, pilots and adult education providers.

In Bosnia and Herzegovina, the development of VNFIL concepts still remains in the education sector, mostly related to adult education: 'in VET, so far only a few ad-hoc activities were recorded in which VNFIL was carried out on the basis of an adult education programme' (see box below).

Ad-hoc VNFIL initiatives in Bosnia and Herzegovina

'…Although there is no VNFIL legislation in Republika Srpska, the Institute for Adult Education at the Ministry of Education conducted two ad-hoc validation procedures for informally acquired knowledge, skills and competences for medical technicians at the request of the Banja Luka University Clinical Centre. The ad-hoc procedure was created according to the publicly valid adult education programmes for the training of technicians in the field of transfusion medicine and radiology. The Institute established panels of experts who assessed the achievements of technicians. The examination consisted of a written test, an oral exam and a practical part. For candidates who successfully passed the examination, the Institute issued certificates of publicly valid adult education programmes…'

Source: Ministry of Education of Republika Srpska, Institute for Adult Education.

In Montenegro, key competence certificates are issued upon completion of the Adult Education measures that the Employment Agency organises in cooperation with licensed Adult Education providers, on the basis of programmes approved by the National Education Council. These programmes are based on the standards for key competences. They can be obtained through direct assessment in line with the legal regulations. This is in high demand: between 2019 and 2022, 988

certificates were issued for key competences (mostly foreign languages and to a lesser extent, digital skills) and two certificates for an adapted elementary education programme for adults. Still, standardised validation procedures are yet to be developed.

In North Macedonia, the Ministry of Education and Science adopted a new Concept document on secondary education for adults (November 2022), which envisages the adult secondary education curricula as based on the key competences (recommended by the Council of the EU) and provides an explanation on how key competences are correlated to the subjects in the regular study programmes, and how they could be further incorporated into the national standards and expected learning outcomes.

In Serbia, 'validation of non-formal and informal learning is defined as an adult education activity based on the principles of lifelong learning.' The legislation provides for a broad platform for adult education since it includes all learning opportunities undertaken by younger and older adults which are outside the regular cycle of education. As part of validation, learning outcomes and competences are assessed against a selected qualification standard, among which are key competences which belong to the general part of primary and vocational education for adults. However, the assessment of key competences has not yet taken place as part of the validation of non-formal and informal learning because the standards of key competences have not been developed yet, and are planned to be developed within the EU IPA 2020 project: increased offer and diversification of accredited informal training courses and adult training service providers.

Validation initiatives in adult education are not only observed in the Western Balkans. For instance, in Moldova, adult education is explicitly included in VNFIL legislation, but no specific programmes are mentioned. In Ukraine, the Draft Law on Adult Education is expected to simplify the VNFIL process and open doors to potential users.

2.3   VNFIL in the Labour Market

Validation in the labour market is often initiated as a bottom-up approach led by economic sectors and employers and this is typically observed in countries where employer organisations also play a more important role in the field of education. These initiatives usually result in the acquisition of a professional certificate, which is recognised and valued on the labour market in general and/or in a specific economic sector, whereby the certificates are often considered a different (alternative or complementary) qualification type than a VET qualification acquired through the formal VET system.

In some Partner Countries, validation in the labour market has existed for years, allowing workers to get qualified without having formal training. For example, in Jordan, national citizens as well as migrant workers with valid work permits can pass through what are known as occupational skill tests to obtain a practice licence as nationally recognised evidence of their skills and competences for practising a specific occupation. Data shows that the need for licences is still relatively high despite the continuous decline throughout the years: the number of licences issued for 2020 was slightly more than 1000 as compared to more than 5500 in 2010. The acquisition of occupational licences is based on the workers' skills level system (semi-skilled, skilled and craftsman), which is not linked to the recently adopted national qualifications framework[11] (2019 – not yet operational). In this context, there are two parallel systems, which are not referenced to each other with the implication that the occupational licences obtained are valid only in the labour market and cannot be transferred to the national qualifications system (or vice versa) and be used thereby to access further education (e.g. in VET).

The phenomenon of 'parallel skills development systems' and the challenge of transferability of validation results between systems (when, for example, an individual wants to use the results of validation from one subsystem to join higher-level training in another system) is observed in several countries (Morocco, Tunisia). In Morocco, successful applicants for VAEP (*Validation des acquis de l'expérience professionnelle)* receive a certificate of labour market competences[12] awarded as part of

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[11] Jordan NQF consists of 10 major qualifications levels from level 1(pre-school certificate) to level 10 (PhD certificate) with subsidiary, supplementary and special qualifications in some sectors.
[12] 'Attestation' in French.

the agreement signed between the partners of each pilot[13], and not as a qualification registered in the National Catalogue (Repertory) of Qualifications attached to the Moroccan National Qualifications Framework. Companies are primarily involved in the initiative since they present applicants; individual persons cannot apply for VAEP procedures. The sectors of activity covered by the various pilots indicate those most in demand and/or most active in developing and using competences (traditional sewing, art carpentry, installation of gas water heaters, etc.). In Tunisia, there is a Trade Testing System *(Certificat d'attestation de qualification professionnelle, CAQP[14])* which is an assessment that aims to ensure that applicants have the necessary competences to practise a specific occupation, considering the requirements of quality, hygiene, professional safety and environmental protection. The assessment is not regarded as a qualification by the population in Tunisia and may even suffer some stigma, even by professionals in the field.

Employer-led validation initiatives may sometimes arise from dissatisfaction with the learning outcomes of VET qualifications. For example, in Kazakhstan up to 2019 it was obligatory for VET graduates to pass through certification centres in order to obtain a professional certification. The certification centres are accredited by the State and the National Chamber of Entrepreneurs (Atameken) and are included in the national register of the Chamber of Entrepreneurs. In July 2023, a new Law on Professional Qualifications was adopted, which is significantly broader in its interpretation of the concept and procedures of validation. For example, the new law focuses on professional qualifications and recognition in the labour market and also ensures a link with the education sector. The latter is based on the understanding of the National Qualifications System as a set of legal and institutional tools and mechanisms for regulating and coordinating the demand for qualifications from the labour market and supply of qualifications from the education system, including informal ones. Certification centres continue to operate under the new law as well.

In Kyrgyzstan, the internationally funded project 'Promoting employment and vocational qualifications in Kyrgyzstan'[15] (2017-2021) was extremely significant in the national context as one of the activities related to testing independent skills certification and validation procedures in eight pilot sectors (food processing/catering, personal care). The procedure included all four validation stages: identification, documentation, assessment and certification, and for example, if the applicant failed to pass the qualification examination, he/she received advice on how to prepare for examination next time.

In Türkiye, depending on the sector, VNFIL has become an important tool for companies to gain qualified staff. A key stakeholder is the Turkish Vocational Qualifications Agency (VQA). VQA oversees the authorisation of certification bodies and examines, audits and evaluates institutions' management system as well as their policies and procedures for assessment and certification. Authorised certification bodies offer individuals an opportunity to have learning outcomes, gained through non-formal and informal learning, recognised. They are authorised for assessment in 410 occupations in 21 sectors whereby the certification in 204 of these occupations is mandatory (mostly hazardous and dangerous occupations). Between 2016 and 2022 more than 2.4 million VQA certificates have been issued through validation whereby the share of non-mandatory certificates accounts for roughly 18% of the total number. The VNFIL system focuses on assessment and certification, and less on the first steps of validation processes (identification and documentation). VQA Vocational Qualification Certificates are recognised and represent credible qualifications in the national labour market and are especially high in demand in specific sectors, such as construction, where a high number of employees lack formal qualifications.

In Ukraine, there had not previously been any opportunity to validate knowledge except for the profession of chef. In 2021, the Ministry of Education approved a 'Typical Regulation of a qualification centre' defining a qualification centre, its main tasks, functions, rights and responsibilities. According to the regulation, qualification centres are to: assess the learning outcomes acquired in formal, non-formal and informal educations and recognise professional qualifications; recognise professional qualifications obtained outside of Ukraine; etc. As of July 2023, there were 20 Qualification centres accredited by the National Qualifications Authority to provide validation services for professional

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[13] The initiative has been implemented on a pilot basis since 2008 with several pilots so far.
[14] http://www.emploi.gov.tn/fr/68/certificat-dattestation-de-qualification-professionnelle
[15] Further information available in Russian at: https://cci.kg/nezavisimaja-sertifikacija/nezavisimaja-sertifikacija-professionalnykh-kompetencijj.html

qualifications defined by occupational standards (e.g. 'electric and gas welder', 'electrician for repair and maintenance of electrical equipment', etc.). Of note is that as of March 2023, all occupational standards developed will include the level of the National Qualifications Framework which will help ensure the transferability of validation results between the labour market and educational sector.

One aspect of validation in the labour market refers also to initiatives led by public employment services, which may be defined within the framework of active labour market policies/measures. For instance, the State Employment Agency in Azerbaijan was involved in a VNFIL project for confectioners with disabilities and other vulnerable groups: 16 persons participated and 13 of them were awarded a Diploma or a Certificate. In Kosovo, the Employment Agency (EARK) has introduced recognition of prior learning (RPL) as an additional Active Labour Market Measure (ALMM) for registered jobseekers to support their access to the labour market or career development. In Moldova, career guidance centres are organised within the National Employment Agency (NEA). Certification of skills obtained by the unemployed formally or informally is a new measure to be implemented. At the same time, the NEA identifies unemployed people who need validation and training services; registered unemployed persons can be channelled to the Validation Centres on the basis of referral letters in order to benefit from a VNFIL measure.

2.4 VNFIL in the Third Sector

Although there is widespread acknowledgement of the important contribution of the third sector (youth organisations, volunteering organisations, NGOs and/or organisations supporting migrants, refugees, etc.) to skills formation, for example through the provision of non-formal trainings, it is likely that the level of use of validation in this sector is lower compared to education and training and the labour market. In addition, validation practices in the third sector are often not documented, and therefore there is a certain lack of evidence.

The lower level of use of VNFIL in the third sector may have various reasons: for instance, it is important to involve third organisations (together with other social stakeholders) in social dialogue from the very beginning when VNFIL arrangements are under development. In Bosnia and Herzegovina, for example, the third sector is not included in the dialogue on VNFIL policy.

Another reason for the lower level of use of VNFIL by third organisations may be limited interest combined with legal requirements. In Montenegro, NGOs intending to organise market-oriented adult education programmes need to first establish, register and license a private adult education institution, which can offer accredited programmes in line with the Adult Education Law. By way of contrast, NGOs can offer non-commercial training programmes but cannot issue any validation certificates, therefore the majority of them usually issue an internal certificate of attendance on successful completion. A similar situation can be observed in most of the countries studied. The case of Kazakhstan deserves more attention (characterised by a bigger territory and higher degree of social differences), where third sector organisations have a unique niche in the provision of non-formal training due to their access to remote rural areas and a wide range of ages and social groups. Over the past few years, representatives of the third sector have been discussing ways to develop a unified approach in the delivery and validation of non-formal training, which resulted in the establishment of the 'Academy of NGO' in Almaty. This was done under a project supported by the Ministry of Information and Social Development with the aim to professionalise the delivery of non-formal learning in Kazakhstan.

In North Macedonia, open civic universities for lifelong learning[16] – as civic sector organisations – provide non-formal training for various occupations, mainly for adults directed towards the acquisition of a qualification for work and for personal development. In practice, trainings are usually adapted and tailored to competences that candidates already possess. In addition, VNFIL was included as one of the benchmark measures in the 'Plan for Implementation of the Youth Guarantee 2020-2027', which is

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[16] According to the Law on Open civic universities for lifelong learning (Official Gazette of the Republic of Macedonia, 2011), OCULLLs provide services in formal education for youth and adults (in primary and secondary education for adults), vocational training for adults and services in non-formal education and training for adults.

expected to increase the use of VNFIL-related activities among youth organisations and NGOs for a wide range of persons who are not employed or involved in education or training (NEETs).

In Tunisia, third sector organisations are very active and they have developed practices that are similar to validation, in some cases in collaboration with public institutions. The main aim of these practices is to match skills of individuals with skills demand or to adapt and profile job seekers to insert them in the job market. The outcomes are mainly internal certificates of soft skills or complementary job skills, which cannot be linked to formal qualifications.

In Ukraine, third sector organisations are only indirectly involved in the validation process in organising non-formal and informal learning. They provide additional opportunities to validation beneficiaries: post-training meetings, meetings with employers, continuous information on vacancies, individual psychological counselling and coaching sessions. Representatives of the third sector work with non-formal learning providers, and educational institutions of different levels of accreditation.

2.5 Reforms of national qualifications systems and their implication for VNFIL

Among those countries from our sample that have developed and (at least partially) implemented National Qualifications Frameworks, there is a clear trend to designing these NQFs as comprehensive frameworks that are open to accommodating learning from various contexts – including formal, non-formal and informal learning. These NQFs often require that qualifications can be awarded through validation. While the majority of NQFs are comprehensive by design, with a number of countries still being in the earlier stages of NQF implementation, it is not yet actually possible to acquire all qualifications on the NQFs through validation.

Significant national developments regarding **the link between validation arrangements and NQFs** can, for example, be observed in North Macedonia. The Law on NQF from 2013 and the Law on Adult Education from 2008 mentioned the possibility of validation of prior knowledge and skills, but a significant and recent development in the area is the preparation of new draft legislation, namely the draft new laws on NQF and Adult Education that will allow the operationalisation of the validation service. They clearly postulate validation of non-formal and informal learning and provide the basis for the establishment of important VNFIL arrangements, i.e. that candidates would be able to obtain all qualifications up to NQF level 5B through validation. It means that VNFIL will cover formal primary education, secondary education and IVET, post-secondary education and non-formal CVET and other forms of adult education. Until 2018, legislation considered validation only in the sphere of non-formal education and certification of vocational qualifications. Since then, the draft new legislation on NQF and Adult Education, and legislation on VET with the Concept on RVETCs (Regional VET Centres) and the Concept for Secondary Education of Adults, include validation arrangements in formal education too, which is an important change in the perception and acceptance of VNFIL by the authorities in the country. Once operationalised, these changes will facilitate broader horizontal and vertical mobility in the educational system and the labour market.

Moreover, NQFs in Kosovo, Moldova, Montenegro, Serbia, Türkiye and Ukraine are by design open to qualifications awarded through validation of non-formal and informal learning. In Kosovo, the NQF, established in 2008, includes all types and levels of qualifications. The national policy foresees that higher education and all types of VET qualifications can be obtained through validation. This being said, so far, current validation arrangements only refer to NVQs of levels 2-5 of the NQF. Validation is also possible in all subsectors in Montenegro. All qualifications are modular and based on credits. Validation is legally possible in all subsectors, even if implementation arrangements are still under development, with the VET sector being most advanced at this stage. The Turkish Qualifications Framework was also designed to allow for recognition of qualifications achieved as a result of the learning in informal and non-formal contexts. Therefore, it supports the VNFIL processes as it helps to clarify the understanding of qualifications and required learning outcomes for the acquisition of qualifications. Based on that, the aim of the policy which promotes VNFIL is to create an environment where the VNFIL arrangements for all qualifications in the TQF are available.

Some countries have adopted or are developing comprehensive NQFs that are open to all types of qualifications/qualifications from all contexts, but which are not yet (fully) implemented at this stage. This can, for example, be observed for Albania, Bosnia and Herzegovina, Kazakhstan or Jordan. In the case of Albania, the NQFs is technically open to all types of qualifications. However, so far, only qualifications provided by the formal education system have been included.

In Kazakhstan and Kyrgyzstan, sectoral qualifications frameworks (SQF) under the NQF have been developed. In Kyrgyzstan, so far, only a SQF for education has been developed.

A number of countries have made progress in establishing and developing **qualifications registers or databases**, although their status of development and functionality vary across countries. Some countries have more comprehensive registers with a larger number of qualifications, while others are still in the early stages of development and expansion.

Active registers are for example reported for Montenegro, Serbia and Türkiye.

Modular and unit-based structures & partial qualifications

Countries increasingly implement modular and unit-based structures, which in several cases are also credit based. Several countries also allow for the awarding of partial qualifications based on validation of non-formal and informal learning. Depending on the specific national definition, partial qualifications may cover a subset of the modules included in a full qualification. The possibility to award partial qualifications can help increase the flexibility, inclusion and employability by recognising smaller bits of learning. Through additional training or recognition of further experience, holders of a partial qualification may subsequently proceed to obtain a full qualification. For example, Azerbaijan, Georgia, Kosovo, Montenegro, North Macedonia and Ukraine allow for the awarding of partial qualifications based on validation.

In Kosovo, both VET and HE qualifications are developed in a modular structure (while general education qualifications are not), and have a credit value. Enabling the creation of a credit system that allows for the accumulation and transfer of credits and learning outcomes between different learning contexts and systems is one of the key objectives of the Kosovo Qualifications Framework. In Montenegro, all qualifications are modular and based on credits; accumulation is possible. Another example is North Macedonia, where the draft new Law on NQF clearly postulates the modular structure of qualifications. Taking into consideration that the draft new Law on NQF further defines modules of a qualification as an independent and encircled unit of learning, or part of an educational programme, it will respectively allow candidates to obtain them through VNFIL, too.

Reference points for assessment

Reference points play an important role in any validation process, as they form the basis of assessment that may ultimately lead to the awarding of a qualification. Examples of commonly used reference points are qualification standards, curricula or specifically developed assessment standards or criteria. A lack of a visible reference point or standard, or how they are applied, can easily hamper trust in validation, as can the use of different reference points for validation than for qualifications from formal education and training. To ensure a parity of esteem between learning from formal, non-formal and informal contexts, traditional and validation pathways should lead to the same type of certificates, rather than 'type-A' and 'type-B' certificates. At the same time, it should be noted that standards originally developed for a purely formal school-based setting may not be well suited for capturing the diversity of an individual's learning experiences, as the 2023 European guidelines for validating non-formal and informal learning point out (Cedefop, 2023). For example, when launching validation, standards in Azerbaijan and North Macedonia had to be revised or updated.

In our country sample, different reference points are being used for validation of non-formal and informal learning. Kosovo and Jordan use occupational standards. In Kyrgyzstan, the use of occupational standards is recommended within the ISC (Independent Skills Certification), however only three occupational standards have been developed so far. Georgia, Kazakhstan, Serbia, Azerbaijan and Moldova use educational/qualification standards. Montenegro, North Macedonia (planned), Türkiye and Ukraine use both educational and occupational standards.

Equivalence of certificates and diplomas

Many countries report that the certificates and diplomas awarded through validation of non-formal and informal learning are equivalent to those awarded through other (formal) learning pathways. In Kosovo, for the currently available validation arrangements for NVQs of levels 2-5 of the NQF, the certificates are the same as those awarded through other pathways. Also for Georgia and Türkiye, the qualifications awarded based on validation are the same as those awarded through other pathways. In North Macedonia, the draft new laws on Adult Education and on NQF (not yet operationalised) foresee that the outcome of validation (certificate for vocational qualifications and a diploma and public document for an educational qualification) will be equivalent to that obtained through formal education.

Yet, while the equivalence of certificates and diplomas is often stated, actual equivalence is in some cases hampered by the fact that validation initiatives only cover the vocational part of qualifications, leaving out the general education part. In some countries, VET qualifications include both general education subjects and VET subjects, meaning that the successful completion of a regular VET study programme will enable entry into higher education as the learner receives a certificate for a professional qualification and a diploma for completed upper secondary education. However, validation arrangements in some cases only cover occupational competences, leaving out the general education part. Thus, while validation certificates are equivalent to professional qualifications, they do not enable access to higher education and therefore cannot be considered as fully equivalent to certificates achieved through the completion of regular VET programmes (e.g. Moldova). A similar challenge can be observed for North Macedonia, where the current validation arrangements only foresee the validation of vocational competences, although all formal VET consists of vocational and general components.

2.6   Institutional setup: responsibilities, coordination

The types of stakeholders involved, their different responsibilities and functions and their coordination play an important role in validation. For any validation arrangement to be trusted and accepted, it is important that relevant stakeholders are appropriately involved, such as employee- and employer-representing organisations, employment services or civil society organisations.

Within the countries studied, the institutional setup for validation is quite similar, at least in general terms – in most countries, a coordinating government institution, usually a Ministry, takes a central role in terms of developing legislation and policy for validation arrangements in education and training. There is so far little evidence of the active involvement of employer organisations and trade unions in validation processes across countries that goes beyond a more indirect form of involvement, except for Kazakhstan and Türkiye.

In some cases, a National Qualifications Authority (NQA) assumes the role of leading policy design and implementation of validation in the country. This is for example the case in Kosovo, where the NQA acts as main policy developer, also due to its role as main institution responsible for NQF implementation. In Kosovo, the coordination of validation arrangements involves various governmental institutions such as the Ministry of Education, Science and Technology, the National Qualifications Authority, the Kosovo Accreditation Agency (KAA) and the Employment Agency of the Republic of Kosovo (EARK). The ministry is responsible for approving policy and legal basis on VNFIL, while the NQA and KAA are responsible for the implementation of recognition of prior learning in the VET and HE sectors, respectively. The EARK plays a role in applying a skills audit called the 'Unemployment Card' for registered jobseekers. Other line ministries, universities, VET providers and international development initiatives also contribute indirectly to the coordination.

In several examples, we can observe that a body gets assigned a leading executive role in implementing validation measures, acting as a kind of 'think tank' for validation and assuming different tasks, including the development of validation measures, capacity building, designing and delivering training for validation practitioners and/or provision of advice and guidance and support to validation candidates. Examples include the Examination Centre in Montenegro, the Adult Education Centre in North Macedonia or the National Center for Educational Quality Enhancement in Georgia:

- In Georgia, validation in VET, RNFE (Recognition of Non-Formal Education), is mainly the responsibility of NCEQE and the RNFE centres. NCEQE, an entity set up within the Ministry of Education and Science, coordinates the process and authorises the provision of validation services to entities, provides training to RNFE consultants, certifies RNFE consultants, develops RNFE resource materials and undertakes external monitoring of RNFE processes.[17]

- In Montenegro, the institutions involved in the coordination of validation arrangements include the Ministry of Education, the National Council for Education, the VET Centre, licensed Adult Education providers and the Qualifications Council. The Ministry of Education is responsible for overall coordination and monitoring of the validation process, while the National Council for Education is an expert body supporting decision-making. The VET Centre is responsible for developing and strengthening the vocational and AE system, and licensed AE providers conduct assessments. Last but not least, the Examination Centre assumes an important role: it organises the training and licensing of VNFIL assessors and submits a proposal to the Ministry of Education listing prospective assessors, based on which the Ministry then issues five-year assessor licences.

- In North Macedonia, the key stakeholders are the Ministry of Education, the Adult Education Centre (AEC) and the Coordinative Body and Working Group on validation established in 2018. While the Ministry of Education will act as main policy developing body, the AEC has been allocated an increasingly important role (note that the system in the country is not yet fully operational at this stage). It is expected that the AEC will assume a lead executive role in implementing validation arrangements, including the development of VNFIL measures and providing technical and capacity-building support, as well as the training for VNFIL practitioners and provision of advice and guidance to candidates.

For the case of Kazakhstan, in turn, a decentralisation trend could be observed following the introduction of the NQF: some regulatory documents on standards were developed, and the development of the Register of Certification Centres (which is located on the website of Atameken, the National Chamber of Entrepreneurs) has started. According to regulatory procedures provided and the Register of Certification Centres, the validation and independent certification of specialists (validation practitioners who need to be certified in order to carry out validation) and VNFIL have been decentralised and delegated to the Certification Centres registered and accredited by Atameken. Thus, the organisations and institutions involved in the validation arrangements include the Certification Centres accredited by Atameken, relevant colleges, private or public organisations and/or large employers.

2.7   The perspective of validation providers

The role of a validation service provider is often assumed by education and training providers, who provide validation services in addition to traditional education. As to which institution may offer validation services in a given country or subsector, and which requirements need to be fulfilled, we observe different setups across countries.

An interesting case is presented by the new Regional VET Centres in North Macedonia. In 2022, the Ministry of Education adopted a development concept for the establishment of Regional VET Centres (RVETC), which foresees that VET schools should be transformed into such RVETCs. These institutions will continue to provide formal VET, but also act as validation providers. Additionally, they are expected to contribute significantly to the development of quality assurance mechanisms and quality practices of validation. They are thus considered to have the potential to create a network of resource centres for validation in the future.

A similar approach can be identified for Moldova, where it is VET Centres of Excellence that assume the role of validation provider. The Ministry of Education, Culture and Research usually assigns the role of a validation centre in the field of VET to the Centres of Excellence and VET institutions with

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[17] For validation in general education, meanwhile, the setting is different. The Ministry of Education acts as coordinating body who in some cases also administers the process directly or through the education institutions. The NCEQE here plays a more limited role in granting authorisation to validation providers.

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increased potential and capacity in certain areas of vocational training. Validation centres in Moldova are subjected to assessment and accreditation by the National Agency for Quality Assurance in Education and Research (ANACEC). By 2023, there were eight validation providers accredited. Likewise, the Framework Regulation for the organisation and functioning of Centres of Excellence, approved in 2015, indicates that the certification of professional skills acquired in a formal, non-formal and informal environment represents one of their functions. Validation centres for VET are required to operate on a non-profit basis.

In Serbia, where VNFIL procedures are currently being implemented in the field of vocational and adult education, validation can be provided by Publicly Recognised Organisers of Adult Education (AEPRO). AEPROs need to be accredited by the Ministry of Education and comply with a set of legally prescribed requirements that refer to their educational provision, staff, space, equipment and teaching aids, including the accessibility of teaching and programmes for people with disabilities. The procedure partially differs depending on whether accreditation refers to a non-formal education programme or a VNFIL activity. Both schools and other organisations may be accredited as AEPROs. However, so far, only schools can be accredited as AEPRO for VNFIL procedures.

A number of countries apply an accreditation model, whereby validation providers need to be accredited before they can offer validation services. These include Albania (not yet operational), Kosovo, Moldova, Montenegro, North Macedonia, Serbia (see above) and Türkiye. Accreditation processes impose different kinds of requirements on prospective validation providers. In some cases, this approach implies two layers of accreditation for validation providers – one to be accredited as a training provider overall, and a second procedure in order to be specifically accredited as a validation provider. This can be observed, for example, in the cases of Albania and Kosovo.

In the case of Albania, an accreditation model is envisaged for providers and has previously been piloted for five public and one private VET providers. However, the accredited providers of training cannot serve as the validation providers until VNFIL is developed and starts its implementation as defined by the consolidated framework legislation (see also 2.12 for more detailed information on funding issues).

In Kosovo, validation can only be provided by providers who have undergone accreditation with the National Qualifications Authority. To obtain accreditation, institutions must meet a number of specific criteria, which are set by law and which relate to aspects such as internal QA mechanisms or specific equipment in place. Compliance with these criteria is perceived as demanding for some VNFIL providers (see 2.11 for more detailed information on the criteria for accreditation). The accreditation is run through an e-accreditation system set up between 2021 and 2022, to assist RPL providers in the process of accreditation with the National Qualifications Authority.

In Montenegro, since the revision of the Law on Vocation Qualifications in 2016, the responsibility for the assessment and awarding of vocational qualifications was transferred to the licensed education providers. Licensing requirements refer to the provision of space, teaching staff and equipment required. As of December 2022, a total of 129 AE providers were licensed, with 15 new providers licensed in 2021 and 2022.

North Macedonia (where validation arrangements are not yet fully operational) requires validation providers to be accredited by the Adult Education Centre, based on the norms and standards for accreditation issued by the Ministry of Education. These refer to the provision of appropriate space, equipment and staff to implement validation processes. Furthermore, the provider needs to employ at least one licenced counsellor for VNFIL services and at least one assessor.

In Türkiye, the VQA (Vocational Qualifications Authority) has a quality assured audit process for the authorised certification bodies, and the specific quality criteria for authorising ACBs are based on ISO EN 17024 Accreditation and the VQA Quality Assurance Criteria and Legislative Regulations. The assessment and certification by ACBs are separated from the training provision and ACBs cannot act as training providers.

To date, for the majority of countries, it seems to be a challenge for VET providers to provide validation services as part of a sustainable business concept. This is linked to one of the main challenges

concerning the implementation of validation arrangements, namely, the securing of sustainable funding (based on national budgets and not on international project funding).

Kyrgyzstan is one of the countries that has experienced challenges in this regard. After a project-funded test-run between 2017 and 2020, centres for Independent Skills Certification (ISC) found it difficult to establish a business model that would allow them to sustain their operations, which is also considered the result of disagreements and misunderstandings between relevant stakeholder groups. As a result, the majority of the previously established ISC providers suspended their work or closed down.

As the example from Montenegro shows, the core business of private AE providers in particular is still income generation through the provision of education and training programmes, and they have little financial incentive to offer validation services. The major obstacles for the implementation of VNFIL are limited resources, interest and motivation of the providers to offer the VNFIL services. Licensed AE providers are required to pay an administrative fee of EUR 500 and to provide a bank guarantee.

The case of Türkiye somewhat constitutes an exception in this regard, in the sense that there is a revenue model in place sustained by the mandatory certification requirements. ACBs need to deliver accreditation and authorisation fees to both TURKAK and the VQA. Additionally, ACBs also need to deliver additional annual fees to the ACBs that are based on the number of certificates awarded. In turn, the pricing of validation services is left in the hands of the providers. However, ACBs can rely on a constant stream of revenue that stems from the fact that certification has been made mandatory for a large number of occupations.

In Kosovo, validation providers face an accreditation cost of at least EUR 600, which can be considered quite a significant amount especially for providers at the beginning of their experience with RPL provision. As is the case for Türkiye, the pricing of validation services is left in the hands of the providers. Section 2.12 related to funding arrangements provides more detailed information on these accreditation fees and the overall distribution of costs.

Information on measures and initiatives taken to inform providers and prepare them for their role in validation is presented in section 2.8 of this report.

2.8   Validation practitioners

Profiles of validation practitioners

Findings from the analysis show that validation-related tasks are typically assumed as an additional role by staff from education institutions or sector professionals. In other words, validation is not usually a job carried out full-time by practitioners.

A number of countries distinguish between three broad types of roles: guidance practitioners, assessors and validation coordinators. Assessors are sometimes organised into assessment commissions or assessment panels, whereas some countries further distinguish internal and external assessors. Some examples include:

- In Jordan, advisory/guidance services provided for candidates are conducted by occupational work regulating officers, trainers or training officers, while skill assessment tasks are conducted by trainers and/or training officers besides their other tasks according to their job descriptions.

- In Kosovo, the current legal framework does not specifically describe the profile of validation practitioners. However, the 2017 Policy document distinguishes the following types of profiles for validation practitioners in an RPL service provider: RPL coordinator, RPL mentor and RPL assessors. RPL assessors are further distinguished into internal assessors and external assessors.

- For Kyrgyzstan, VNFIL arrangements in the labour market identify two basic roles – managers and experts – while the profile of validation practitioners in the education sector has not yet been defined.

- Montenegro has defined the profile of an assessor but does not have defined profiles of other validation practitioners.

- In North Macedonia, over the past few years, standards for 'Assessor in VNFIL' and 'Counsellor in VNFIL' qualification have been developed by the AEC. They are expected to become fully operational after the adoption of the relevant laws.

- In Serbia, the profiles of validation practitioners are described in the rulebook on VNFIL. The main roles in the validation process are VNFIL advisor, evaluator from school and evaluator from the economy.

- In Türkiye, practitioners in VQA validation processes include quality management representatives, assessors/decision-makers/internal verifiers and certification managers. The assessors' profiles are defined in the qualification standards. The assessors for the technical fields are mostly teachers at VET schools and engineers. For the other fields, the assessors are experienced professionals, e.g. an experienced hotel manager in the tourism field.

Qualification requirements for validation practitioners

The majority of countries have requirements (in terms of relevant experience and/or qualifications) for validation practitioners in place. Some countries only have such requirements in place for the role of assessor.

Some examples for mandatory qualification or experience requirements for validation practitioners in general:

- In Kosovo, the qualification requirements for validation practitioners are specified in Administrative Instruction No. 09/2019, which mandates that RPL practitioners must be trained by the NQA, without stating more detailed requirements. However, a policy document from 2017 defines the knowledge, skills and competences required for the different roles of RPL coordinators, mentors and assessors.

- For North Macedonia, the draft new Law on Adult Education postulates that the assessment of the competences of the candidate for VNFIL is performed by a commission formed by the provider of the VNFIL services. All validation practitioners need to be certified by the AEC. In order to be certified, the applicants for counsellors for validation need to take part in training for counselling in

VNFIL organised by the Adult Education Centre. Similarly, the applicants for assessors for validation will need to enrol in training for assessment in VNFIL (note that the validation system in the country is not yet operational).

- Serbia has mandatory requirements for various roles involved in the validation process, such as counsellors and evaluators (and further distinction between evaluators from school and from the labour market). These requirements include specific qualifications, years of experience and training in vocational education and competency-based assessment.

- In Türkiye, specific requirements exist for all professionals who take part in the validation arrangements for the VQA (Vocational Qualifications Authority) qualifications. For example, Certification managers and quality management representatives of the ACBs should undertake the training provided by the VQA focusing on the VQA processes and validation. The assessors/decision-makers/internal verifiers should undertake the assessment and evaluation training on competence-based assessment. These training courses are a prerequisite for being employed by the ACBs.

Some examples for mandatory qualification or experience requirements for assessors in validation:

- In Moldova, the eligibility requirements for members of the evaluation and certification committees include a minimum International Standard Classification of Education (ISCED) VI level in the respective professional field, at least five years of professional experience and a qualification as an assessor issued by accredited educational institutions.

- The Law on National Vocational Qualifications in Montenegro prescribes mandatory requirements for assessors, including an appropriate educational profile, at least five years of professional experience in the relevant field and completion of a training programme for assessors. Assessors are licensed by the Ministry of Education following a nomination by the National Examination Centre. The licence is issued for a period of five years.

Provision of training and support to validation practitioners

Many countries provide initial training to VNFIL practitioners, either on a mandatory or optional basis. Based on the information available, however, none of the countries studied have integrated training on VNFIL processes into formal teacher training. Relatively few countries so far provide continuing training/professional development on VNFIL processes.

Some examples of initial training include:

- In Bosnia and Herzegovina, a training programme for the validation of non-formal and informal learning (VNFIL) is being developed for a pilot activity at two faculties, which will subsequently be implemented with the support of an EU-funded IPA project. There are plans to conduct training according to the created VNFIL model for higher education at all institutions. Through the upcoming project that should start its implementation in 2023 and will last for three years, more comprehensive training for all relevant actors in the education sector is foreseen.

- In Georgia, for validation in VET, the National Center for Educational Quality Enhancement provides a training programme to potential RNFE consultants. It focuses on NQF and VET qualifications, education standards and modules, RNFE processes and the tasks of the RNFE consultant.

- In Kosovo, the NQA has developed guidelines and training programmes for coordinators, mentors and evaluators of recognition of prior learning. Several training sessions have been conducted for RPL practitioners, and master trainers have been trained to train RPL providers.

- In Moldova, the validation centre organises training sessions for chairpersons and assessors of the Evaluation and Certification Committee for the validation processes.

- In Montenegro, training for assessors is mandatory as a prerequisite for obtaining the licence, but further professional development measures for VNFIL practitioners are not in place.

- In North Macedonia, the Adult Education Center (AEC) provides mandatory training on VNFIL processes for (future) counsellors and assessors, but continuous development of practitioners' competences is not regulated.

- In Serbia, initial training for VNFIL practitioners is available, mandatory and accredited, while continuing professional development training on VNFIL is currently not proposed.

- In Ukraine, while there is no mandatory training for validation practitioners, the National Qualifications Agency organises online training sessions for assessors in Qualification Centres.

2.9 Information and guidance

For validation to become an accepted and well-established pathway, individuals need to be aware of the possibilities for validation offered. They need to be aware of what validation of non-formal and informal learning is and how it works, i.e. the functioning and implications of the validation process. Career guidance and counselling services play an important role in this as well and should be systematically integrated into validation services and policies.

Information and awareness raising

Countries that have some sort of validation arrangements in place generally provide information about validation online, e.g. on institutional websites. In many cases, however, this information tends to be rather descriptive and is not necessarily to create outreach and raise awareness of the benefits of validation. Not in all cases is the information provided updated on a regular basis. Results from the analysis show very little evidence of awareness raising or outreach campaigns. Overall, for many of the countries, it seems that the cooperation between relevant stakeholder groups with regards to the provision of information and awareness raising could be improved. This being said, some countries do indeed use a mix of methods to raise awareness of and share information about the possibilities of validation, as the following examples illustrate.

In the case of Kazakhstan, information provided online, through websites and more recently also on Instagram, is one of the main methods to share information about validation. To account for the varying degrees of literacy among different groups of the population and varying access to good quality internet across the country, this is complemented with the provision of information through other channels of communication such as TV, radio and print media, often supplemented by open telephone lines where listeners may ask questions.

An interesting development can be observed for Kosovo where a pre-registration platform has been developed, which in particular seeks to collect information on the demand for RPL qualifications, as the box below illustrates.

Development of a pre-registration platform for validation users in Kosovo

During 2021 and through 2022 and with the support of the EU project implemented by LuxDev, the National Qualifications Authority has developed a digital platform for the purposes of the recognition of prior leaning. This platform aims to raise awareness, inform and educate the beneficiaries, institutions or individuals who would like to go through RPL, regarding the procedures and criteria already in place.

This includes an online pre-registration platform for individuals who express their interest in a specific qualification. In the pre-registration form, the interested individuals are asked to enter several data regarding their age, region, qualification needed, etc. The aim of this pre-registration for individuals is to create an overview of the demand for qualifications to be accredited in the NQF and validated to be introduced as RPL (or VNFIL) offers, as well as matching the individuals with the VTC in their region, if needed. Preliminary information (as of spring 2023) is that more than 350 persons have already registered on the platform.

In addition, the platform includes an e-accreditation system set up to assist RPL providers in the process of accreditation with the NQA.

Plans for a campaign were also reported in Kosovo. With the finalisation of the legal basis and the capacity building activities for the implementing institutions and providers, and also in preparation for the start of RPL services for individuals interested, the NQA in coordination with LuxDev is apparently planning a broad awareness-raising campaign to start shortly.

Furthermore, between 2019 and 2022, significant efforts were made to provide information to potential validation service providers. Besides the setup of the e-accreditation system (see box above), this included continuous training to NQA staff on the operationalisation of the RPL system, the procedures for providers and training for future RPL practitioners, as well as information sessions organised with national VET institutions for the operationalisation of the RPL services and accreditation process.

Several countries promote validation through success stories of validation candidates. In Azerbaijan, the website of the Education Quality Assurance Agency (EQAA) provides information on the validation process, including an inspirational video detailing a successful user story. Moldova also uses such success stories (displayed through a video, pictures and text) to raise awareness of validation procedures.[18]

Overall, for several countries, the need to improve information and outreach regarding validation and its benefits was reported (e.g. in the case of Azerbaijan, Bosnia and Herzegovina and Kazakhstan). In the case of Azerbaijan, the EQAA is trying to address the known problem of a lack of awareness of validation procedures among the potential target groups. While cooperation with the State Employment Agency on awareness-raising activities (e.g. towards jobseekers) has proven successful in the early VNFIL stages, the EQAA is still trying to work out the most promising way to communicate with (potential) users beyond the existing channels (see above).

Advice and guidance

The provision of information, advice and guidance to (potential) validation candidates varies across countries. Some countries have established systems and channels for providing comprehensive advice and guidance, while others are still in the early stages of development.

Based on the analysis, very few countries seem to require the provision of advice and guidance to candidates, while for the other countries this is an optional offer to candidates. In Kyrgyzstan, for validation in the education system, personal contact with the educational organisation is required before candidates can use VNFIL services for continuing education or recognising a qualification, and prior information on the availability of the service can be obtained by telephone.

The following countries have an integrated advice and guidance offer in place for validation candidates:

- Kosovo: Advice and guidance are an integral part of the VNFIL/RPL arrangements in Kosovo. Coordinators and mentors provide information, advice, and guidance to candidates during different phases of the RPL process.

- Georgia: While validation in general education lacks guidance and application support, in the field of VET, the provision of guidance in the identification and documentation stages is a key component of the RNFE (Recognition of Non-Formal Education) validation process. There is a requirement for RNFE providers to have certified consultants, and they are officially required to

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[18] https://www.tkta.edu.az/p/informal-education; https://mec.gov.md/ro/content/validarea-educatiei-nonformale-si-informale-1

provide consultative and guidance services. The provision of guidance in RNFE is well defined and structured within the RNFE system, and the tasks of consultants in the process are clearly laid out.

- Moldova: VET institutions/Validation Centres in Moldova have counsellors who provide free consultations and advice on VNFIL services. Candidates are guided throughout the validation process.

- Serbia: Accredited schools/AEPROs and the Ministry of Education in Serbia provide information about VNFIL services and offer advice to candidates. Individual meetings with counsellors are available to guide candidates through the VNFIL process.

In North Macedonia, as VNFIL arrangements are not yet operational at this stage, the Adult Education Centre acts as main provider of information on validation. In the future, once operational, there are plans to establish 'information points' which would provide initial information and guidance on further steps in the validation process free of charge. Various institutions across the countries could fulfil the role of an 'information point', including the units of the employment service agency, VET schools, universities or NGOs.

2.10 Validation methods

Validation processes should be carried out using appropriate methods and tools for the identification, documentation, assessment and certification of learning outcomes. What tools and methods are appropriate will depend on a number of contextual factors. Appropriate validation methods should take into account the users' needs and allow them to fully capture their previous learning experiences. At the same time, when selecting methods and tools for validation, considerations related to the validity, reliability and scalability must be taken into consideration and balanced.

In most countries, assessment takes the form of testing – usually consisting of a theoretical part and a practical part. Portfolios of evidence are used as well, usually in combination with interviews or workplace demonstrations.

- Azerbaijan: Candidates register online and can upload their documents to their personal account. The validation process starts with a declarative method, followed by document review and an interview. It continues with a knowledge exam and a practical assessment based on observation and simulation methods.

- Georgia: In general education, assessment is done through testing. In non-formal vocational training, methods include self-assessments, third-party assessments, observations and portfolios. The RNFE process is digitised, allowing for electronic submission and assessment.

- Jordan: Validation methods for RPL in VET include tests and examinations – the occupational tests consist of theoretical and practical parts, with minimum passing scores required. Previous projects also used portfolios and workplace observations.

- Kosovo: The regulatory framework provides a list of methods to collect evidence, which is not exhaustive and may be adapted: oral or written tests and practical skills demonstrations. Examples of how to use these methods can be found in the Guideline and Programme for the RPL Coordinator, Mentors and Evaluators, published in 2022.

- Moldova: Methods are specified in the assessment plan drawn up by the Validation Centre. It generally includes theoretical and practical tests, with priority given to workplace observations.

- Serbia: Common validation/assessment methods include self-assessment, fixed-answer and multiple-choice questions, open-ended assessments, interviews, observations, portfolios, presentations, simulations and controlled work practice.

- Türkiye: Validation methods in the VQA system involve theoretical and practical exams, including case studies, interviews, practical demonstrations, simulations, role-plays and presentations.

In North Macedonia, VNFIL arrangements are not yet operational. However, the 'Handbook for Assessment in the context of VNFIL' already describes the plans for validation methods. In the future,

once implemented, they shall be based on portfolios of evidence combined with simulations or observations of job tasks/practice. Additional methods include debates, interviews, presentations, tests and examinations.

There is little evidence from countries on the use of ICT in validation, more specifically during the processes of identifying, documenting, assessing and certifying competences, except for the example of the digitised RNFE process in Georgia (see box below) and the online registration implemented in Azerbaijan (see above). This is, of course, linked to the general state of development of validation procedures in a number of the countries studied. One can however expect that the use of ICT in validation will become an important topic for discussion as validation procedures get more widely implemented.

The partially digitised RNFE process in Georgia

The RNFE (recognition of non-formal education) process in Georgia is partially digitised. All applications and RNFE portfolios are administered through an electronic system, which also registers the outcomes of validation procedures, thus collecting relevant statistics on RNFE processes and outcomes.

The electronic system for RNFE has NQF levels, framework and fields of study built into it, automatically directing users to the qualifications included in the framework. Full or partial qualifications can be validated and certified.

An individual seeking validation first files an application through a special electronic system within the eVET platform where they are requested to choose between options for objectives of RNFE (personal development, further education: for obtaining qualification or for employment, career development: self-employment). The system also documents all consultative meetings between the applicant and the RNFE consultant: date of the meeting, the objectives of the meeting, identified skills, provided evidence, further action.

As a next step, the consultant completes an online form specifying the objective of the RNFE (validating a full or partial qualification) and a form for referencing the identified skills to learning outcomes and performance criteria in vocational education standards, titles and reference numbers of relevant evidence. The form will then be co-signed by the applicant and consultant. The form is managed electronically through the RNFE system.

Source: National VNFIL country report on Georgia

For Kazakhstan, it has been reported that some validation providers are known to (increasingly) use ICT-based tools for identifying, documenting, assessing and/or certifying competences. For validation procedures related to qualifications from the formal education system, there are some nationally standardised tools and templates available to be used in validation procedures (e.g. online tools, e-portfolio templates).

2.11 Quality assurance

The implementation of quality assurance mechanisms in validation is linked to the stage of development of VNFIL within a country. For instance, if a legal framework is not operational or has been recently adopted, quality assurance measures still need to be defined or re-defined (Albania, Bosnia and Herzegovina, Morocco, Tunisia).

Partner Countries implementing validation in education and training typically use more general quality assurance frameworks (those already used in education and training). Quality assurance frameworks specifically applying to validation processes in at least one sector are observed only in two countries: in Kosovo (VET) and Türkiye (labour market).

Partner Countries also tend to have either external or internal evaluation of quality assurance while the combination of both approaches is rarer (e.g. Kosovo, North Macedonia, Serbia, Türkiye).

All countries studied highlight the use of reference points such as occupational standards (VNFIL in the labour market) and/or educational standards whereby a correspondence between assessment

criteria and learning outcomes stated in qualifications seems to be crucial. While all countries use some kind of reference points, linking different reference points such as occupational standards with educational ones seems to be more challenging and time consuming. Of note is that if different types of standards/qualifications (occupational vs. educational) are not referenced, this has an implication on the transferability of validation outcomes from one sector (e.g. labour market) to another (education and training) and vice versa.

Authorisation of validation providers is another common QA measure found in most Partner Countries (see below).

Initial training of practitioners is also often used; however, it is predominantly targeted at assessors, with guidance practitioners (advisors) being rather the exception. In comparison, continuous professional training for all practitioner profiles is largely missing in all countries studied.

QA mechanisms for guidance practitioners are very rare for the countries covered, however Georgia is an exception. For example, there is a requirement for validation providers in VET to have certified consultants. Consultants' activities are closely monitored by the National Center for Educational Quality Enhancement (NCEQE), which is responsible for assessing and analysing the consultation process and developing annual reports on consultants' activities. The NCEQE provides training to the consultants and has developed guidebooks for consultants and applicants on RNFE, which respondents assessed as very helpful.

Validity and credibility of assessment is ensured through separating the functions of practitioners: in VAEP procedures in Morocco, for example, guidance practitioners cannot be involved in assessment. Furthermore, in countries with validation arrangements in the labour market, employers usually participate in the assessment process (Jordan, Kazakhstan, Türkiye, Ukraine).

In the majority of countries, there is a lack of regular monitoring systems covering service quality, usage trends and user outcomes in validation arrangements (see section on monitoring).

The next paragraphs focus on selected examples of quality assurance mechanisms in VNFIL in a specific sector. Of note is that national reports focus predominantly on what is prescribed and described in legislation and less so on how effectively quality assurance mechanisms are implemented, the challenges and shortcomings encountered and how quality assurance is used for further improvement of validation provision.

General education

Of all the countries which reported having validation practices in the general education sector[19], Georgia provides a detailed description on how the QA system works there. The right for schools to provide certification of general education acquired through external studies is connected with having an accreditation to provide general education programmes. The QA system is rather centralised: the Ministry of Education and Science (MoES) approves the tests developed for the compulsory subjects of the secondary general education cycle certification. The test instruments should be in line with National Curriculum requirements, which provide guidance on assessment approaches and required learning outcomes at each subject, grade and cycle levels.[20]

The rule for certification of general education acquired through external studies is very specific on monitoring the process of testing and identification and penalties with potential breaches of conduct by applicants during the exam. There is a possibility to appeal both the results of the exams and the administration quality for identification and penalising potential breaches of conduct on the part of examinees. Ministry staff have a right to observe the exam sites directly.

Of note is that schools are in charge of guidance of VNFIL applicants and since this is not a core area of their activities, guidance is likely to be very basic and would probably not cover the needs of most vulnerable groups.

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[19] These include Azerbaijan, Kazakhstan, Kyrgyzstan, Moldova, Türkiye and Ukraine.
[20] There is evidence that examinations in general education mostly check knowledge of facts and fail to check higher skills. Therefore, it may be beneficial to explore opportunities for adjusting validation methods.

Vocational education and training

In the majority of Partner Countries with VNFIL in VET, a special authorisation for validation providers is needed. In Georgia, Recognition of Non-Formal Education (RNFE) is implemented by bodies specially licensed by NCEQE, i.e. only institutions having a right to provide officially recognised vocational education qualifications are eligible for providing RNFE within the fields of their current education programmes.

In Kosovo, it is mandatory for providers of education and training, validation or certification for national professional qualifications to have a Document for Internal Policies and Procedures for the RPL that contains internal QA mechanisms and monitoring mechanisms, among many other aspects. Regarding QA of the VNFL services that will be provided to the individuals/candidates, there are guidelines[21] for the VNFIL accredited providers and the RPL practitioners which address the assessment process, tools and methods; assessment criteria and learning outcomes; appeals procedure; advice and guidance; identification; documentation; and certification procedures.

In Moldova, only institutions that are accredited as providers of education programmes are authorised to carry out validation, and only for qualifications covered by the programme accreditation. The National Agency for Quality Assurance oversees external quality assurance and carries out accreditation and monitoring functions. Qualification and educational standards are used as a basis for assessment.

In Ukraine, an admission control procedure (вхідний контроль) allows training institutions, which also provide opportunities for professional upskilling and reskilling, to shorten training periods for persons who are accepted for training based on: a) identification of knowledge, abilities and skills of a certain level of a person's professional qualification and b) development of an individual training plan for obtaining a new qualification or improving the existing one. The person fills in a self-assessment questionnaire (developed by a vocational and technical educational institution), which is then assessed by an expert commission against the requirements of state standards of professional and technical education for a specific professional qualification.

In a couple of countries there is no special authorisation for VET providers to offer VNFIL (Azerbaijan, Kazakhstan, Kyrgyzstan).

Higher education

Among the countries studied, there are a few examples of an emerging approach to quality assurance of validation in higher education.

Jordan – *The National Qualification Framework By-law No. 9 of 2019* tasked the Quality Assurance Council for Higher Education Institutions (AQACHE) with the responsibility for the development of a quality assurance guide to be used by qualifications quality assurance and training provider institutions in developing and implementing its measures for accrediting and quality assurance of qualifications. It also tasked the council with developing policies, criteria, mechanisms and controls for RPL. However, expected outcomes of the two tasks were still under development at the time the country report was prepared (2021).

Kosovo – According to the NQF regulatory framework in force, the VNFIL processes in HE and VET are subject to the same QA procedures as the formal learning routes, while QA criteria and preconditions should be specific and developed by the institution responsible for QA, i.e. the Kosovo Accreditation Agency (KAA) for higher education. The principles of QA apply to VNFIL/RPL regarding the presence of the internal and external QA mechanisms. The internal QA is the responsibility of the accredited institution, whereas the external QA of the VNFIL/RPL services is the responsibility of the KAA. While the developments in VET are highly positive, the KAA, on the other hand, has not progressed with the development of criteria for accreditation in HE, and currently there are no interventions planned in that sub-sector.

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[21] Guidelines for the experts who evaluate the institutions for the implementation of the RPL during the accreditation process (2022); Guideline for the interested providers that apply for accreditation for RPL implementation (2022); Guideline and programme for the coordinators, mentors and evaluators of RPL (2018).

Ukraine – According to the *Procedure for Recognition of Learning outcomes of non-formal and / or informal education in higher education*, the validation procedure in HE institution is to:

- provide special procedures to ensure confidentiality and ethical standards in the validation process;

- establish requirements for reliability and quality assurance of validation, including additional mechanisms of control and quality assurance for educational (educational-professional, educational-scientific) programmes, which provide for the assignment of professional qualifications in professions for which additional regulation is introduced;

- identify mechanisms for creating validation conditions for people with special educational needs: the authorised institution ensures the development and implementation of the validation quality assurance system as a component of the internal quality assurance system.

Adult education

In Montenegro, educational providers licensed as AE providers, which can be public (schools, VET schools and HEIs) or private, are responsible for the assessment and awarding of vocational qualifications in the context of VNFIL. The licensing procedure carried out by the Ministry of Education is required to fulfil certain conditions such as provision of space, teaching staff and equipment for the implementation of the education programmes, payment of an administrative fee of EUR 500 and a bank guarantee. The VET Centre organises online and on-site counselling and instructions for the AE providers, informing them about legal, planning and strategic documents and their practical implementation. Further systematic measures supporting the preparation of the licensed AE providers to perform their VNFIL roles (e.g. support with development of methodologies, further staff training) are not implemented. Assessors (in VNFIL procedures) need to complete a special training programme prescribed by the Ministry of Education and published as a public call, in addition to the required work experience and the necessary exam.

In Serbia, the quality assurance framework is provided by the *Rulebook on VNFIL*. According to this framework, the quality assurance of the VNFIL procedure is prescribed to be carried out through self-evaluation conducted by the school itself and external evaluation carried out by the Qualifications Authority. Through self-evaluation, the school assesses the quality of the VNFIL procedure, the continuous training and professional development of employees engaged in the VNFIL Team, the conditions by which the procedure is carried out, the satisfaction of candidates (adults who have passed the VNFIL procedure at the school) and employers who participate in the procedure and also other representatives of the labour market and vocational associations. Furthermore, the school is forming a special team for quality assurance including teachers, professional associates, non-teaching staff and representatives of employers who participate in the implementation of the VNFIL procedure. The VNFIL Rulebook includes instructions on assessment processes, tools and methods, assessment criteria, counselling and guidance procedures, documentation identification, certification and appeals procedures.

QA arrangements for VNFIL in the labour market

Similarly to the VET sector, QA arrangements for validation in the labour market include specific authorisation procedures for certification bodies whereby authorisation is provided mainly for conducting assessment and certification.

In Kazakhstan, Certification Centres provide validation in the labour market and they are accredited as VNFIL providers by the state and the National Chamber of Entrepreneurs (Atameken). Currently, there are 36 such centres[22] and they are included in the national register of Atameken. In order to be accredited, the Centres have to establish a Qualification Commission for independent certification of specialists whereby the chairman and members of the Commission are employers from the field and must have appropriate qualifications and work experience. Furthermore, Centres also have to set up an Appeals Commission to consider cases of appeal. Accreditation shall be renewed every five years.

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[22] Associations of employers run 26 of the Centres, enterprises run 9 Centres and VET institutions run one.

In Kyrgyzstan, QA issues in relation to the labour market validation within the Independent Skills Certification System (ISC) can be seen as a matter for the future for when ISC is restored to working capacity and national regulations are adopted. Practices in the past show that applicants who failed the certification exam may appeal to the certification centre according to a specified procedure. ISC is not likely to develop towards a mandatory certification system due to the high share of informal economy in the country; in other words, the pervasive informal labour relations are not conducive to people seeking formal recognition of non-formally or informally acquired skills and formalising them with a qualification.

In Türkiye, the VQA has a quality assured audit process for the ACBs: to offer relevant qualifications, these institutions should first satisfy the accreditation requirement, in accordance with TTS EN ISO/IEC 17024 Standard. This accreditation is awarded by the Turkish Accreditation Agency or the accreditation bodies that have signed the multilateral recognition agreement within the European Cooperation for Accreditation. Institutions meeting the accreditation requirement may apply to VQA for authorisation. VQA examines, audits and evaluates the institutions' management system as well as their policies and procedures for assessment and certification activities. If found eligible, the institutions are authorised to carry out the assessment and certification based on NQs and receive the status of Authorised Certification Bodies. The audits can be scheduled or ad hoc. There were 1543 scheduled and 743 ad hoc audits by December 2022. All assessment activities are video-recorded and stored. The use of such control mechanisms is said to be with the intention of avoiding potential cases of corruption.

In Ukraine, the qualifications centres (VNFIL providers in the labour market) are mandated with assessing the learning outcomes acquired in formal, non-formal and informal educations and recognising professional qualifications (including those obtained abroad). In accordance with 'The Regulation on accreditation of qualification centres' (2021), to guarantee quality assurance in validation, the qualification centres are obliged to:

- have their own website, which publishes information on assessment procedures, assessment requirements, the procedure for recognition of professional qualifications, etc.;

- ensure compliance with the accreditation criteria and requirements for the activities of qualification centres defined by law.

In order to ensure the openness and transparency of the accreditation procedure, the NQA shall publish on its website: (1) decision on the accreditation procedure immediately, no later than five working days from the date of its adoption; (2) the report of the expert commission and the NQA's decision on the results of the accreditation procedure immediately, no later than five working days from the date of the NQA's decision.

2.12   Funding

Recent data collected for 11 countries: Albania, Bosnia and Herzegovina, Kazakhstan, Kosovo, Kyrgyzstan, Montenegro, Morocco, North Macedonia, Serbia, Tunisia and Türkiye reaffirms findings from the 2022 ETF cross-country analysis on 5 countries: Azerbaijan, Jordan, Georgia, Moldova and Ukraine (ETF 2022a). Evidence shows that:

- all countries reviewed (16) lack a dedicated, sufficient and sustainable funding model for validation services and further system development;

- cost sharing possibilities between key stakeholders involved in validation, such as the state (regions), social partners (employers and employer associations, trade unions, etc.) and individuals, are not explored and conceptualised; costs are mainly covered by candidates instead. Nevertheless, in some countries employers may provide venues for the organisation of certification procedures;

- funding through individual fees tends only to cover assessment-related costs while overlooking the full costs related to RPL / VNFIL, including outreach, information and guidance, professional development of guidance and assessment practitioners, needs analysis of potential target groups

and provision of complementary training courses to candidates who have not fully succeeded in the validation process (ETF 2022a);

- financial incentives for employers, validation providers and most individuals are almost absent. For some disadvantaged groups (e.g. long-term unemployed), additional funding may be allocated through ALMP measures;

- international funding (EU, ILO) has been playing a key role for developing institutional infrastructure, methodological tools as well as pilot activities in the field of validation. However, once a project or initiative comes to an end it is very difficult to build on what has been achieved since there are no financial incentives for individuals to stimulate their participation in VNFIL. Without an influx of candidates offering VNFIL services cannot become a business case for validation providers.

Funding based on individual fees. Costs of RPL/VNFIL procedures are predominantly covered by applicants, which could represent a barrier to accessing validation. For example, in Azerbaijan, the number of beneficiaries is still low despite the slow progress observed within the last three years. The low numbers may be explained with the validation costs (but probably not only): AZN 100 (EUR 54) for the assessment of knowledge in the relevant specialty, and AZN 80 (EUR 43) for each module for the assessment of skills, competences and experience. Considering the average salary in the country (around EUR 500/month in June 2023), these costs seem to be high.

In Kazakhstan, funding of certification procedures performed by the certification centres in the respective industry (voluntary certification) is based on fees from applicants, which vary depending on their socio-economic status. For instance, procedures organised by the 'Certification Centre of the Hospitality Industry' cost between EUR 5 and EUR 21, which does not seem to be a barrier to accessing the service judging by the number of certificates (852) issued in 2022. The newly adopted law on VET qualifications foresees the introduction of incentives for employers and individuals (employed and unemployed) stimulating the use of voluntary certification. For instance, those registered unemployed will be entitled to receive a one-time voucher to be granted once a year. They can also choose the professional qualification and the certification centre which will carry out the procedure[23].

In some countries, validation providers pay high costs for accreditation and therefore the price of VNFIL for individuals is left at the discretion of the provider, possibly making the service unaffordable. For example, in Kosovo the accreditation fee is at least EUR 600, including:

- EUR 300 – first-time accreditation fee;

- EUR 130/location if the RPL services are performed in more than one location;

- EUR 1 for each candidate to be paid to the NQA when verifying the diploma and certificates;

- EUR 100/day for local experts, EUR 200/day for regional experts and EUR 400/day for international experts, part of the NQA's expert team in the accreditation process.

According to the regulations, RPL procedures for individual candidates are set through standard funding agreements between RPL providers and candidates. Providers will individually calculate the cost of the RPL service according to the size of modules and qualifications to be assessed, experts engaged, equipment and consumables needed. Currently, there are only seven providers accredited to implement the validation, and therefore the cost of validation required from the individuals is not yet defined.

In Türkiye, the assessment fees for vocational qualification certificates (validation in the labour market) range from approximately EUR 40 to EUR 330. The fees are determined by the ACBs depending on the complexity of the qualification and assessment cost. For the non-nationals who want to get their vocational qualification certificates recognised/validated, if they apply from Türkiye, the fee is

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[23] See Art. 27, 28 and 29 from the new law on VET qualifications:
https://online.zakon.kz/Document/?doc_id=38051365&doc_id2=38051365#activate_doc=2&pos=8;-106&pos2=311;-92

approximately EUR 100, and if they apply from abroad, it is around EUR 130, with financial support available from the EU grant programmes for everyone. The fees are monitored by VQA, and assessment fees can be increased twice a year at inflation rate. Individual costs are determined by ACBs since validation providers have to pay several major fees in order to offer VNFIL services, such as:

- EUR 230–330 accreditation fee to TURKAK; authorisation fee to VQA;

- Audit fee to both TURKAK and VQA; staff costs; facility costs;

- EUR 485 (up to 500 certificates) to EUR 4429 (for more than 10 000 certificates) annual fee paid by the ACBs to VQA depending on the number of certificates issued.

State funding. National public funding is used only modestly to sustain the VNFIL systems. For instance, in VET and in higher education, fees are envisaged as the main validation funding mechanism in the majority of countries. In relation to general education, different rules apply since it tends to be free of charge, e.g. extramural exams in Georgia. Also, validation procedures in adult education or the labour market which may cover some disadvantaged groups like the (long-term) unemployed can be financed through active labour market policies (ALMPs). In Kosovo, the VNFL/RPL services offered to unemployed jobseekers by the Vocational Training Centres of the Employment Agency are covered by public funds and offered free of charge. In Moldova, preferential fees can be used for disadvantaged groups. In Montenegro, the Agency for Employment finances the qualification initiatives that may include validation procedures. Eligibility for funding is defined separately within each of the initiatives, depending on the characteristics of the public calls. Potential barriers to access are related to the education level of potential beneficiaries and its implications for interest and access to information, computer literacy or availability of ICT equipment.

Financial and non-financial support by the private sector. The engagement of the private sector in funding of validation is scarce except for in Türkiye, where certification is mandatory for a list of 204 hazardous occupations. Involvement of employers through the provision of assessment venues is reported in Azerbaijan, Kazakhstan (e.g. in the case of certification centres) and Moldova. The involvement of sectoral organisations in validation procedures (certifications) in the labour market is characteristic for Kazakhstan (e.g. The National Chamber of Entrepreneurs – Atameken) and Kyrgyzstan (the Chamber of Commerce and Industry – CCI).

Lack of financial incentives for key stakeholders in validation, no business case for VNFIL providers. Financial incentives for employers, validation providers and individual candidates are currently very rare in the countries reviewed. For example, validation providers cannot accumulate income from offering validation as certification fees often cannot exceed the actual costs incurred. Furthermore, providers find themselves solely responsible for organising the validation process, including building partnerships, organising funding, assuring a quality service and reaching out to the candidates. In Türkiye, for instance, this has been partially resolved by making validation compulsory (currently for 204 occupations).

Provided that financial incentives for employers, individuals and providers of validation are not available, international project support plays an important role for all 16 countries and this applies for both countries where a VNFIL system is already operational and countries where the system is still under development. For instance, in Bosnia and Herzegovina, the development of all VNFIL models (policy level) elaborated so far have been financed with EU funds through IPA technical assistance projects. In North Macedonia, the development of VNFIL arrangements in the last few years massively relied on international funding, mostly by ETF, EU IPA funds and UNDP. All these internationally funded initiatives were substantially important for establishing the basis of the VNFIL system in the country. In Serbia, the VNFIL is currently financed by the EU and other international funds. Funding sources are not yet addressed by the existing regulatory framework documents dealing with VNFIL. For the time being, VNFIL services are funded by projects and the procedure is free of charge for users.

International project support and sustainability. The importance of international project support in Partner Countries studied raises the question about sustainability of validation practices following the

end of international projects. As the Kyrgyz example illustrates below, sustainability aspects are context specific depending on a combination of factors like the share of informal economy in a country; motivation and attitude of potential validation candidates towards investing in qualifications; availability of financial incentives for individuals, validation providers and employers; etc.

Financial barriers to rolling out independent skills certification (ISC) in Kyrgyzstan

The internationally funded project 'Promoting employment and vocational qualifications in Kyrgyzstan'[24], launched in 2017 and continued in 2021, was extremely significant in the national context. One of the activities related to testing independent skills certification and validation procedures in eight pilot sectors (food processing/catering, personal care). The methodological approach was developed by the Chamber of Commerce and Industry (CCI) and consisted in the following: a competent body, authorised by a sectoral organisation, certifies (based on examination) that the demonstrated skills of an employee meet the requirements of an established occupational standard (draft standards were used in the testing).

The ISC procedures included all four validation stages: identification, documentation, assessment and certification, and if applicants fail to pass the qualification examination, they receive advice on how to prepare for examination next time. About 1,500 graduates of vocational schools have undergone a test-run of ISC in eight sectors with the support of GIZ.

Despite the outcomes achieved after the end of funding from foreign partners, virtually all of the centres established in 2017-2020 ceased to operate since the project has not led to elaboration of a business model for ISC in the labour market.

Due to the high share of informal economy in the country (involving around 70% of the labour force), people with low incomes tend to look for quick jobs and earnings, as opposed to investing in their qualifications. This explains why after the end of international funding, there was no obvious influx of candidates for certification in the ISC centres. As a result, the centres could not generate enough income and their activities had to cease.

Source: based on the National VNFIL country report on Kyrgyzstan.

In Moldova, the work of many validation providers seemed to have slowed down after international project support finished, with one centre mainly conducting validation procedures. Nevertheless, 376 candidates were certified in 2023 and 243 in 2022. In a sustainability context, the updated country report highlights that 'Validation Centres have to be incentivised and supported to continuously offer validation', whereby support may also be understood in financial terms.

With the launch of the EU-funded PEFESE programme (The Support Programme for Education, Training, Higher Education and Employability of Graduates)[25] in 2011, Tunisia has been able to learn from the expertise of other countries, mainly France, and rethink their VNFIL system in a holistic manner. In other words, the programme provided an opportunity to amplify the approach for the existing Trade Test System (practices with validation components in the labour market) to become an actual VNFIL system. However, the underpinning legislation which would have supported the implementation of this approach is still missing.

2.13 Beneficiaries

The table below illustrates data on validation outcomes (number of full/partial qualifications awarded or number of occupational licences/certificates issued) as reported by 11 countries. As countries use

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[24] Further information available in Russian at: https://cci.kg/nezavisimaja-sertifikacija/nezavisimaja-sertifikacija-professionalnykh-kompetencijj.html

[25] Programme d'appui pour l'éducation, la formation, l'enseignement supérieur et l'employabilité (PEFESE) – The programme, co-financed by the EU to the tune of EUR 61.3 million, aimed to support the opening up of the education system to the business world and improve the training/employment relationship.

different VNFIL concepts and have different institutional infrastructure and data collection practices, data is not comparable and **shall be understood and analysed within the country's own context.** Given that the ETF VNFIL Inventory plans to track the progress of countries with some regularity, it is important to keep track of the absolute number of validation outcomes **as reported by countries**.

The table shows that validation outcomes were mostly reported for the VET sector and the labour market. For the rest of the sectors, with few exceptions, data was under-reported. The lack of monitoring data may point to an initial stage of validation approaches, practices implemented on a case-by-case basis (e.g. validation in higher education) and/or also perhaps a lack of targeting/ideas on who could benefit from validation. For instance, if countries had some specific policy objectives and particular groups of users in mind when launching validation, they tended to prepare detailed reports. For instance, Moldova has a separate reporting line for circular migrants[26].

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[26] In some countries where validation arrangements are still not operational, priority target groups have been defined. In Albania, VNFIL is mainly supposed to address persons who used to work in small family businesses, returning migrants, redundant workers and drop-outs of formal education. In North Macedonia, it is expected that priority target groups will include people with some competences in high-demand sectors, the long-term unemployed, people with few/no qualifications, people without primary education, etc.

Table 2 Data on VNFIL outcomes in 11 countries

Country	Reporting period	No. full qualifications awarded	No. partial qualifications awarded	No. occupational licences/certificates issued (LM)	Population aged 15-64 in million (2022)*
Azerbaijan	2020-21	11 (VET)	16 (VET)	n.a.	7.04
	2020-23	76 (VET)	679 (VET)	n.a.	
Georgia	2016-21	3,278 (GE)		n.a.	2.38
	2022	1 (VET)	19 (VET)	n.a.	
Jordan	2016-21			11,745	7.23
Kazakhstan	2022	n.a.	n.a.	852 (hospitality sector) 163 (food sector)	12.22
Kosovo	2017-18				1.21
	2019-22	24 (VET)		n.a.	
Kyrgyzstan	2022-24	n.a.	n.a.	196	4.26
Moldova	2020	47 (VET)		n.a.	1.72
	2019-23	961 (VET)		n.a.	
Montenegro	2014-16		318 (VET)	n.a.	0.40
	2019-22		1,172 (VET) 990 (AE)	n.a.	
Morocco	2019-23			1,323	24.61
Türkiye	2016-18		n.a.	358,679	57.90
	2016-22	n.a.	n.a.	2,412,543	
Ukraine	2016-21	n.a.	n.a.	600	24.99

Source: Study team based VNFIL country reports and updates, * World Bank Database; GE = general education; VET = vocational education and training; AE = adult education; LM = labour market.

[blue box] validation arrangements are not operational.

n.a. – there is evidence on existing practices, but data is not reported as it is not publicly available, collected or monitored.

In Azerbaijan, some progress was observed between 2021 and 2023 – the number of full qualifications acquired in VET more than tripled, reaching 76 in 2023. Moreover, the number of partial qualifications awarded significantly increased to 679 certificates in 2023, up from 16 in 2021. Of note is that competences are stackable and can result in the acquisition of a full qualification (diploma)[27]. These

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[27] Based on data published by the Azerbaijani Quality Assurance Agency – the only validation provider so far in the country;
https://docs.google.com/spreadsheets/d/1NNI7U8qJ86XqrGlSqHoO79FXdP7OjbPgbitqnbQHE2o/edit?pli=1#gid=0

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positive developments have been accompanied by an increased number of qualifications that can now be used for VNFIL procedures, from 14 to 19. The relatively high costs for validation (see previous section) may have an impact on the speed of the progress made.

Although several countries implement validation arrangements in general education, Georgia is the only one that provides relevant data. Between 2016 and 2021, the number of qualifications awarded was relatively high, amounting to 3,278 persons[28] in total. Since 2021, a notable positive development has been the implementation of validation in the VET sector: in 2022, one full qualification was awarded as compared to 20 partial qualifications.

In Jordan, most recent data is not available, but the number of occupational practice licences issued between 2016 and 2021 is relatively high – 11,745 in total (this refers to licences financed by national funds only). The licences are nationally recognised evidence of skills and competences for practising a specific occupation and beneficiaries included mostly Jordanians (more than 90%) but also migrant workers.

In Kazakhstan, the total number of certifications carried out in the labour market has not been reported, but based on feedback from national stakeholders, it is high on average. There is disaggregated data available for two certification centres involved in VNFIL procedures. In the first, the 'Certification centre for the hospitality industry under the Kazakh tourist association and Kazakh association of hotels and restaurants', the number of certificates was 852 (2022), as compared to the second, the 'Certification centre of the Union of food enterprises', where the number was 163 (2022).[29]

In Kosovo, validation arrangements before 2019 were not operational, therefore there is no data on beneficiaries for this period. Between 2019 and 2022, slow progress was made in the VET sector, amounting to a total of 24 certificates issued.

Data in Kyrgyzstan refers to certificates (196) issued by the centres for independent skills certification (ISC) between 2015 and 2016.[30] In addition, 1,500 graduates of vocational schools went through a test-run of ISC between 2017 and 2020. Of note is that certification is voluntary and in the absence of a relevant funding model, implementation will remain on hold because of low number of interested candidates.

Since 2019, Moldova has made visible progress in implementing validation arrangements in VET. While in 2019 there were 8 accredited validation providers (2 of which awarded 47 full qualifications), in 2023 there were 13.[31] Since January 2019, 961 candidates (739 of them female) have had their skills certified and 165 of them were Moldovan migrants who returned to the country.[32]

Positive developments are also notable for Montenegro. Between 2019 and 2022, validation certificates issued for part of a vocational qualification amounted to 1,172 as compared to 318 between 2014 and 2016.[33] A new development was observed in AE: between 2019 and 2022, 988 certificates were issued for key competences (mostly foreign languages and, to a lesser extent, digital skills) and 2 certificates for an adapted elementary education programme for adults.

In Türkiye, data on validation outcomes in the education and training sector was not available. Developments in the labour market point to a higher number of validation providers – there are currently 274 ACBs and beneficiaries, and more than 2.4 million VQA certificates through validation were acquired between 2016 and 2022. This high number is due to the use of mandatory certifications

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[28] Beneficiaries include returning migrants; individuals who could not attend a subject, grade or cycle of formal education for some personal reasons (mostly illnesses or migration); and graduates of general education programmes with no formal recognition in Georgia, if they want to continue higher education in Georgia (general education certificate is a prerequisite for higher education entrance exams).

[29] Of note is that before 2019, certification was mandatory for VET graduates, which explains the higher number of beneficiaries in all sectors. Since then, however, the number of beneficiaries dropped with some exceptions (e.g. in the tourist sector). The newly adopted law on VET qualifications (2023), which introduces mandatory certification for some professions (to be defined), will certainly lead to an increased number of VNFIL beneficiaries in these professions.

[30] Data available in Russian at: https://cci.kg/nezavisimaja-sertifikacija/statistika-po-rezultatam-nspk.html

[31] Data available in Romanian at: https://mecc.gov.md/ro/content/validarea-educatiei-nonformale-si-informale-0

[32] https://mecc.gov.md/sites/default/files/meserii_profesii_centre_de_validare_actualizata_03.07.2023_1.docx

[33] Due to the adoption of regulations (VNFIL-related by-laws, etc.) no qualifications were awarded via validation from 2016 to May 2018.

for hazardous occupations. The majority of the beneficiaries were male (94%)[34]; aged between 21 and 40 (62%); graduates of junior high school, high school and secondary school (74%); and already employed when applying for validation (83%). The ACBs also provide opportunities for low-skilled individuals to validate their skills and upgrade their competences. Specific support is available for people who are illiterate or visually impaired (see box below).

Opportunities for disadvantaged groups provided by ACBs (Türkiye)

Several ACBs already conduct assessment and certification of migrants. VQA has plans and allocated resources for further capacity building of the ACBs, specifically related to migrants' assessment and certification process (most of them are Syrians, but not all). The ACBs have stressed the higher validation costs as additional funds are needed for interpreting as well as translating foreign language original documents and strongly emphasised that sustainable financial resources are required to maintain the validation activities for this target group. At present, the costs are paid by the projects, employers and VQA. A recent study[35] highlights that after 12 years of the Syrian refugees' arrival, Türkiye – currently hosting some 3.6 million registered Syrian refugees[36] – still does not have structured information on their skills profiles, resulting in deepened skills mismatch and under-employment.

Source: National VNFIL country report on Türkiye.

Despite the ongoing war in Ukraine, there is visible progress made as regards VNFIL in the labour market. Between 2021 and 2023, 1,504[37] certificates of professional qualification were issued as compared to 600 between 2016 and 2021. The number of accredited validation providers (known as qualification centres) was almost 7 times higher, increasing from 3 (2021) to 20 (2023). Furthermore, 148 professional qualifications can now be used as reference points for validation compared to one professional qualification ('chef') in 2021.[38]

2.14   Monitoring of outcomes

The countries explored do not have a systematic approach to data collection, monitoring and evaluation in the field of validation, and therefore reporting on the evidence of impact appears to be quite weak. In addition, data on beneficiaries is likely to be fragmented since it refers to some sectors only while national VNFIL implementation covers more.

For instance, for several countries there is evidence for validation arrangements operational in general education (Azerbaijan, Kazakhstan, Kyrgyzstan, Moldova, Türkiye, Ukraine), but only Georgia reported data on beneficiaries. One explanation for this could be that in some countries, validation happens on a case-by-case basis (e.g. Kyrgyzstan) and therefore it is difficult to capture any developments, especially when there are no related regulations.

Even if data on beneficiaries is available (e.g. in the VET sector), it is not always clear whether it refers to the acquisition of a full or partial vocational qualification. This may also be due to technical reasons such as differences in the use of data categories, e.g. the 2018 Inventory report on Montenegro and the 2022-2023 version. Moreover, when the acquisition of partial qualifications is available it shall be visible from the data provided whether certificates are stackable and can lead to a full qualification. In

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[34] Women are under-represented in hazardous occupations.
[35] Varol, K.G (2022). An Evaluation of the Role of Active Labour Market Policies on Syrian Refugees' Access to the Labour Market: The Case of ILO in Türkiye. Ankara. Thesis, Master of Science. https://open.metu.edu.tr/bitstream/handle/11511/97359/10465778%20%20-%20MS%20-%20Gizem%20Karsli%20V..pdf
[36] https://www.unhcr.org/tr/en/refugees-and-asylum-seekers-in-turkey#:~:text=T%C3%BCrkiye%20currently%20hosts%20some%203.6,of%20concern%20from%20other%20nationalities.
[37] 2023 data is incomplete since it covers the end of July 2023.
[38] Based on the National Qualifications Agency's Digest (July 2023). Not published.

this context, Azerbaijan presents a good example, where data clearly shows how many certificates a person has acquired and whether it resulted in the gaining of a full vocational qualification.

In relation to data on beneficiaries from validation in adult education, it is important to distinguish between data on acquisition of key competences, data related to the acquisition of occupational competences and to completion of elementary education programmes for adults. Montenegro presents an example where such distinction in data collection is made.

The countries studied do not always provide data on applicants, which is important as this will give insights on the need for validation in a specific sector as compared to the success rate of validation candidates. For instance, in Azerbaijan, the number of applicants was quite high at 279 (2018), as compared to only 11 full VET qualifications issued. One of the reasons for the low success rate may be related to the costs of validation.

Reported data on beneficiaries is rarely available by more detailed socio-demographic indicators like gender, age, employment status and educational level. An exception is data provided by Türkiye concerning individuals who obtained VQA certificates in the labour market. In Ukraine, data on professional qualifications issued (through validation in the labour market) include the name of successful candidates, but no further information, e.g. completed educational level.

As mentioned earlier, evidence of impact appears to be quite weak (if at all) given that few of the countries explored reported on the use of beneficiaries' surveys. There may be a good reason for the lack of such surveys, as they require the allocation of a dedicated budget line, which in the case of the 16 countries reviewed is probably too early to expect (see section on funding).

Electronic databases have been developed in Azerbaijan and Georgia which can be used for monitoring purposes; however, if and how these can provide evidence of impact remains unclear.

2.15   Position of validation in society

What is behind delays in the adoption of relevant legislation and in the implementation of validation? To what extent and by whom is validation perceived as a beneficial measure for the common good or as a threat to the formal system?

The different types of stakeholders have different opinions and perceptions about validation, and therefore the position of VNFIL in a country is likely to be ambiguous. On the one hand, national institutions may be supportive of VNFIL in that they conceptualise, draft and adopt necessary legislation and set validation as a priority in national strategies and/or policies. On the other hand, there may be a significant time span between the draft of a law, its adoption and its implementation.

Depending on whether VNFIL has been introduced more or less recently and whether there are existing practices (independent from legal regulations), the visibility of VNFIL varies, as does the extent to which residents and national (regional) stakeholders are familiar with it.

For a few countries with validation practices in the education sector where VNFIL is still not legally regulated, a common pattern is that while validation is visible in national strategies and policies, it remains unknown within society. For instance, in Morocco, the VAEP is beginning to be visible in several national documents and certain employers recognise the benefits of using the VAEP; however, society as a whole remains largely unaware of this approach. Of note is that in Morocco, individuals have no right to apply for validation independently from their employer – it has to be the employer who 'nominates' a candidate. In Tunisia, VNFIL is only known by a small group of technicians and evidence is too scarce to provide any significant vision of whether qualifications obtained through validation would be recognised by the society.

In countries where legal frameworks have been adopted, the visibility of VNFIL in policy documents and strategies has been increasing whereby the level of involvement of different stakeholders varies.

In Albania, the legal framework was recently adopted and although not yet operational, there is a high degree of acceptance for VNFIL by policy makers, employers and social partners as an important

instrument to increase the flexibility of the VET offer and to promote inclusion and mobility in the labour market.

In Azerbaijan, VNFIL is mentioned in the 'Employment Strategy of the Republic of Azerbaijan for 2019-2030' approved in 2018 and is seen as one of the priorities for improving the skills of the workforce and developing labour standards.

In Georgia, VNFIL in general education is a well-established system, effectively used by potential beneficiaries. By way of contrast, the visibility of RNFE, which is a more recent arrangement, is very low despite some awareness-raising activities organised at a central level (such as by the Ministry of Education).

In Kosovo, the visibility of the VNFIL services has been increasing in the last five years and the evidence for this is the introduction of the term and task of 'Recognition of Prior Learning' in the most recent policy documents on education and employment. Due to an increased need for a qualified workforce, interest from employers and employers' organisations is growing: during the past three years, they were actively involved in capacity building and awareness-raising workshops organised by the NQA. The adoption of a legal framework with a transparent QA system, accompanied by training of staff of involved institutions, has increased the trust of stakeholders in validation.

In Moldova, the draft of Education 2030 Strategy points to the need to create a system and tools that would enable the identification, validation and certification of individuals' professional competences and one of its priority directions foresees the development of the learning outcomes assessment system at all levels and cycles of the education system, focusing on descriptors, qualifiers and accumulation portfolios, as well as on motivational and non-stressful mechanisms of this process.

In Montenegro, VNFIL was recognised in all main strategic documents, however this did not improve the actual position of validation: information about VNFIL is not known or accessible to the majority of the population and awareness-raising initiatives are scarce. The Employment Agency and the VET Centre remain pioneers in conducting such initiatives, however these are more focused on qualification measures in general and only marginally deal with validation.

In North Macedonia, the visibility of validation is higher among the governmental organisations and agencies, following their increased involvement in legislative developments.[39] However, there is not much progress in the visibility and involvement of stakeholders in the context of the labour market, trade unions, third sector and among the potential candidates. This is partly due to the delays in the legislation reforms and consequently due to the lack of legal basis for many of the prospective measures.

In Serbia, validation is highly visible and recognised in all relevant national policies and strategies, however there is a general lack of knowledge about the opportunities and advantages VNFIL provides, as well as a lack of information about VNFIL among employers and representatives of the labour market. In the current phase of development, the education sector has been mostly involved in VNFIL implementation, although labour market representatives also participated in the conceptualisation of the approach. The active involvement of the labour market is addressed and their participation in the VNFIL processes is expected to increase in the near future.

In Türkiye, a study on higher education indicates that learners' awareness of recognition of the learning acquired outside the formal institutions is almost non-existent.

In Ukraine, the public attitude to non-formal and informal learning changed from vague/general understanding to mindful awareness. Drivers for this change include external factors such as globalisation, technological progress, an unstable and fast-changing labour market and the COVID-19 pandemic. For instance, due to quarantine restrictions in 2020-2021, VNFIL activities have become highly in demand among students at all levels of higher education. The educational institutions developed their internal regulations on recognition of learning outcomes acquired in non-formal or informal learning in accordance with the respective laws. A direct contribution to this change of attitude

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[39] Until 2018 legislation considered validation only in the sphere of non-formal education and certification of vocational qualifications. Since then, the draft new legislation on NQF and adult education, and legislation on VET, have included validation arrangements in formal education too, which is an important change in the perception and acceptance of VNFIL by the authorities in the country.

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relates to the active cooperation of policymakers with the relevant stakeholders and international partners to design a legislative basis for an effective, transparent and trusted validation process. Growing cooperation was also supported by an increased number of public awareness initiatives, organised by the NQA.

A recurrent issue in the majority of countries studied is the lack of trust among employers in validation outcomes and the need for broader and effectively targeted dissemination campaigns on the benefits of validation. Since higher involvement of the private sector is difficult to achieve (not only for the 16 countries explored, but also for EU countries), countries with sectoral VNFIL arrangements in the labour market are of particular interest.

In Jordan, validation in the labour market has been being implemented for more than two decades and although there is no documented feedback available on how VNFIL is seen by concerned users, there is anecdotal evidence that employers do not have much trust/interest in the validation process. This can be explained by the lack of awareness on VNFIL measures used, insufficient quality control measures applied and lack of employers' participation in the assessment process.

In Kazakhstan, VNFIL is visible in major national strategies and policy documents and the COVID-19 pandemic (2020-2021) has led to increased involvement of all interested parties in VNFIL implementation. However, trust in the results of VNFIL is still patchy.

In Türkiye, the Regulation that made VQA qualifications mandatory for (currently) 204 occupations has given a boost to validation in the country. The involvement of employers' organisations in validation through the ACBs creates visibility and trust in the VQA qualifications and the validation process. Thus, the VQA awards are becoming well-known in various sectors of the economy and are preferred by individuals and employers. Nevertheless, it seems that there is a need for more awareness-raising activities to inform the learners about the process and how it could be accessible to them. A challenge for the coming years will be to make validation accessible to other groups such as women, migrants and unemployed people. Steps in this direction are being taken by VQA, the ACBs and the Ministry of National Education (MoNE).

In Ukraine, the State Employment Service is a key actor in the implementation of validation in the labour market. It shares information about the high level of reliability and transparency of VNFIL service in the assessment/qualifications centres responsible for the verification of non-formal vocational training results for a number of professions (e.g. 'chef'). Most beneficiaries give positive feedback not only on the validation procedure itself, but also on received information, advice and guidance.

3. Positive drivers and opportunities

Evidence from the comparative analysis on 16 ETF Partner Countries identified positive drivers and opportunities that stimulate the implementation of validation arrangements.

Drivers. Development and use of validation in ETF Partner Countries is influenced by a combination of external and internal drivers. The **EU policy framework** related to the EQF has inspired some Partner Countries to modernise their qualifications systems, for example as a result of concluded Association Agreements, which assumed collaboration in this area. Meanwhile, the Western Balkan countries and Türkiye, as well as some as some Eastern Partnership countries like Georgia, Moldova and Ukraine, have also joined the EQF Advisory Group, which has also triggered developments in validation context.

Availability of international project support, which plays a pivotal role in building capacity; setting up mechanisms, tools and instruments; and testing approaches, especially at the stage of development or early implementation of validation arrangements. All Partner Countries analysed have used international project support mostly through country-focused EU projects and cooperation projects supported by other international organisations: DVV-IIZ, ILO, UNDP, IOM (migrants). Illustrative examples of positive impact include Moldova and Serbia: in Moldova, detailed regulations, guidelines and templates for validation were developed through such projects. It is important to emphasise that while international project support is indispensable during the development and early implementation stages, an overreliance on external assistance over an extended period of time may signal issues with regard to sustainability.

Migration, including circular migration, is yet another external driver for using validation in order to address the (re-)integration of migrants and provide them with possibilities to work, hopefully responding to their qualifications and at the same time addressing skill shortages in national, regional and/or local economies.

External drivers, while significant, are not singularly sufficient to make validation happen. It is the interaction between these external influences and the internal (context-specific) drivers that account for the progress made or the lack thereof in the area of validation.

Some Partner Countries have already had **past experiences** in the field of validation. For example, in Jordan, Morocco and Tunisia, skills tests have been in existence for tradespeople and artisans, allowing them to get recognised as qualified workers without formal training. In Morocco, a fully-fledged legislative framework on VNFIL does not yet exist, but validation practices leading to the acquisition of professional certificates (VAEP) have existed for quite some time (the implementation of the first pilot was in 2008). The initiative is significant in terms of beneficiaries: between 2019 and 2022 the total number was 711, with 612 in 2023 at the time of writing this report. In Tunisia, there is the long existing Trade Test System (Certificat d'attestation de qualification professionnelle, CAQP) in some craft sectors which allows applicants without qualifications but with occupational experience to be assessed and receive a "Certificate of labour market competences".

In the Eastern European countries, in the past, training did not stop after completing formal education; there was systemic adult education organised by companies allowing workers to upgrade their skills and adapt their profiles through '*perekvalifikacija*' which also contained an element of assessing increased skill levels, giving people the right to higher salaries. In the Western Balkans, andragogy was a relatively independent branch of studies at universities and linked with well-developed adult education practices with state-supported infrastructures such as the Workers' universities (which still have a legacy in countries such as North Macedonia). There has been a tradition of extramural exams for general and higher education ('*eksternat*') in Eastern European countries (e.g. Azerbaijan, Georgia, Moldova, Ukraine), which have been an established form of assessing the knowledge and skills of young people who did not participate in regular educational programmes. In Georgia, validation in general education traditionally caters for a high number of beneficiaries. For instance, there were more than 3,000 beneficiaries aged 19 and above between 2016 and 2021 (ETF 2022).

A growing number of countries are developing **lifelong learning or related national strategies**, recognising thereby the need for validation in the context of globalisation, information technology, easier access to learning through own means, need for adaptation to a rapidly changing world and learning throughout life. For example, mentioning validation of non-formal or informal learning in lifelong learning strategies relates to **a changing perspective towards learning,** which is expressed in empowering individuals to act autonomously rather than just reproduce knowledge or follow instructions. This is also reflected in new laws of education that put more focus on competences, individuals' agency in choosing own learning pathways and lifelong learning, thereby highlighting the importance to recognise learning from different settings. It is often accompanied by initiatives to structure qualifications into smaller components such as units of learning outcomes, supporting the provision of more individualised and flexible learning pathways and facilitating the recognition of smaller lessons. With countries adopting new policy documents and laws that acknowledge the need for validation services, international project support to develop and pilot validation mechanisms is activated.

A more recent internal driver refers to **dissatisfaction with the (learning) outcome of VET qualifications** when they do not respond to existing skill needs in a country or region. In several cases, this has led to the creation of employer- or sector-led alternative approaches, typically in countries where employer organisations play a more important role. These alternative approaches focus on sectoral or professional qualifications, usually closely linked with occupational/professional standards, and are expressed in an independent assessment outside the VET system. Such assessments are likely to be more trusted by labour market stakeholders as compared to the VET exams leading to the acquisition of a VET qualification. Examples refer to validation arrangements in the labour market implemented by sectoral recognition centres (former certification centres) in Kazakhstan, authorised certification bodies in Türkiye and Qualification Centres in Ukraine. Türkiye is the country with the highest number of validation certificates issued in the labour market (more than 2.4 million since 2016), which can be explained by its introduction of mandatory certification (currently for 204 professions). However, it should be noted that roughly 18% of the certificates issued refer to non-mandatory certification – although the scaling up of the system was triggered by an obligation, positive developments are notable also for voluntary certification.

Another more recent trend that can be observed is the **setting up and accrediting of new educational institutions (e.g. adult education providers) or the expanding of the mandates of existing ones to become validation providers**. This approach can become a positive driver when delivery of validation services is entrusted to strong and trusted institutions. For instance, in Moldova the Centres of Excellence which are the main validation providers have demonstrated an ability to scale up validation services in a relatively short time. Following the adoption of the national regulatory framework, the number of accredited validation providers almost tripled from 3 (2019) to 8 (2023) and the total number of citizens who validated their professional skills reached 961 (2023). Validation services are currently provided for 92 qualifications and occupations.

North Macedonia will test the delivery of validation services in three Regional VET Centres established in 2022. RVET are expected to have a leading role in developing good practices for validation in education and training. Five qualifications (hairdresser/hairstylist, auto body repair technician, baker, beekeeper and dressmaker) were selected for testing validation, whereby selection was based on several criteria: importance of the qualifications for the regions where they will be validated, shortage of skills in the region(s) and positive estimations of potential candidates who are interested.

Finally, an increasingly important driver is related to the need for integrating disadvantaged and vulnerable groups (like the long-term unemployed, people with lower incomes and lower qualifications or lack of qualifications, (returning) migrants and refugees) into labour markets, which may incentivise countries to introduce validation as part of **active labour market measures.** For instance, Kosovo introduced validation to support career development and the access of registered jobseekers to the labour market. Validation may also be used as a **(re-)integration measure**, especially aimed at returning migrants (as reported in Moldova) or procedures specifically targeted at refugees, as reported in Jordan and Türkiye, for example. In some cases, validation is seen as an instrument supporting economy formalisation. In addition, there is evidence on emerging categories of potential VNFIL beneficiaries such as workers in digital economy, new forms of employment and platform

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workers. 'This is particularly relevant to, for example, advanced digital skills development among IT sector specialists, given that in this sector formal education tends to receive less attention, while the focus is on actual/practical skills that could be gained through non-formal or informal learning' (ETF 2021, p. 65).

Opportunities

In addition to the drivers with a positive impact on the use of validation in Partner Countries, there are also opportunities, which are related to recent developments and can be explored in the years to come.

Opening up validation to non-formal learning providers

In Albania, the increasing offer of non-formal and informal education courses and the high number of providers (of which 12 are public and 833 private) may contribute to the scaling up of validation. In addition, there are massive learning opportunities (non-formal and informal) offered by enterprises, social partners, youth organisations and adult organisations through local and international engagement in internships, voluntary work and mobilities. However, in order to enable the opening up of validation to non-formal learning providers, transitional provisions for their accreditation need to be considered. Of note is that before the adoption of the new regulation in 2021 (DCM no. 756), these providers were authorised to offer validation as well (see example below).

> ### 'Prior Learning Recognition Initiative' (PLR) in bakery and pastry (Albania)
>
> The initiative was implemented from 2017 to 2021 by AlbContact Centre – a private VET provider of non-formal learning licensed by the Ministry of Finance and Economy. It came as a continuous need of the persons requiring recognition of skills acquired at work, during immigration, in their community.
>
> Targeted persons included: a) Albanian circular migrants who had worked in the bakery/pastry field abroad (especially in EU countries) and wanted to open a business back home; b) young Albanians who needed to certify their skills to enable labour under a regular employment contract; c) small businesses (bakery and pastry shops) who had to comply with National Food Authority regulations; and d) persons who had worked in small family businesses and wanted to certify their learning-by-doing outcomes.
>
> The initiative resulted in that 70 persons, both women and men, certified their prior learning outcomes by obtaining the 'Master' or 'Assistant Master' title.
>
> The procedure included three steps: evaluation (assessment), documentation and certification. Evaluation was carried out in a real working environment facilitated by a formal, written cooperation agreement between AlbContact and a bakery business. Furthermore, candidates were assessed by an evaluation committee composed of experts in the specialty (e.g. Master in Bakery), representatives from the business, academia/VET public and German experts, since AlbContact (known also as the 'German school') has a strong cooperation with international/German experts in the field of bakery. The process and results of the evaluation were properly documented and archived by the organiser/AlbContact Centre.
>
> The project stopped due to the entering into force of DCM no. 756 dated 9.12.2021 'On the system of recognition of prior informal and non-formal learning', which defines the criteria and conditions under which a VET provider can offer validation. The need for validation services is likely to be high since AlbContact Centre continues receiving many requests from its clients for the recognition of their prior learning skills and competences.
>
> Source: https://www.linkedin.com/in/albcontact-centre-40bb38206/recent-activity/documents/

Another example relates to Kazakhstan, where third-sector organisations have a unique niche in the provision of non-formal training due to their access to remote rural areas and a wide range of age and social groups. Opening up validation to these providers will possibly mean reaching out to groups that can benefit from validation, including disadvantaged groups.

Further work on national qualifications frameworks or systems presents an opportunity given that in many of the ETF Partner Countries, validation started with the development of national qualification

frameworks. For instance, in Montenegro, the adoption of a legal and strategic framework and the NQF have enabled the establishment of a functional VNFIL approach, which in the last three years (2019-2022) has led to more than a thousand beneficiaries in VET and slightly fewer in adult education. In Bosnia and Herzegovina, the development of VNFIL is linked to the development of the NQF, which approves occupational and qualification standards to be used as referencing points for validation. Since the NQF is not in full use yet, it might be more feasible for the entities, cantons and districts to go ahead and scale up validation activities within their respective remits that are not related to recognition of full qualifications, rather than waiting for the NQF to become operational.

In Jordan, the adoption of bylaws and guidelines related to the NQF, which provides for an overarching approach to validation across the whole qualification system, is crucial. As a further step, linking the NQF to the workers' occupational skills levels system, currently implemented in the labour market, could be considered. The latter will enable permeability between both sectors, possibly also in terms of the transferability of validation outcomes from labour market to education and vice versa.

The development of Sectoral Qualifications Frameworks under the NQF is currently a priority in most Central Asian countries including Kazakhstan and Kyrgyzstan. In Kazakhstan, for instance, SQFs are already used for a range of sectors, and in Kyrgyzstan, the adoption of SQFs is slower, but progressing. SQFs can be used for validation in the labour market (as they are based on professional/occupational standards) and since SQFs are under NQFs, this may enable the transferability of validation outcomes.

At the same time, slow progress in operationalisation of the qualifications frameworks and a low number of quality assured qualifications introduced to the qualifications registers impose a limit with regard to validation opportunities.

Development of standards for key competences – this can also be considered as part of the further work on NQFs. In Serbia, the system for VNFIL is in its initial phase with validation procedures currently being implemented in the field of VET and adult education. Assessment of key competences in the general education field are foreseen to become part of the validation system as well but this will follow the development of the respective standards.

Development of new structures that can stimulate the implementation of validation. Following the adoption of a new Law on Education[40] in Kyrgyzstan in August 2023, a Regulation on the establishment of the 'Centre for Independent Certification and Validation' under the Ministry of Education and Science was adopted too. The centre should carry out activities aimed at improving the quality of vocational education in the Republic through an independent assessment of skills/qualifications, as well as recognition of non-formal learning – informal learning is not considered for the moment. An opportunity may be to explore possibilities for synergies between the activities of this new centre with a similar one that could be created for validation in the labour market, which builds on the pilot activities related to independent skills assessment (2017-2021). Synergies between sectors are possible as demonstrated by the pilot, such as vocational lyceums, and other VET stakeholders were involved so it was possible to rely on their resources to conduct assessments.

Use of digital resources to support validation procedures – in Kosovo, the e-accreditation process for validation providers is likely to support quicker and smoother accreditation procedures, which may lead to an increase in the number of VNFIL providers. In addition, the digital platform for pre-enrolment for individuals that aims to collect information on the need of validation can be used to improve the targeting of validation initiatives.

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[40] The law does not explicitly contain rules and regulations for dealing with non-formal and informal learning, although it entitles citizens to undergo validation and to receive a document confirming qualifications. The procedure for validation is prescribed to be established by the authorised state body in the field of education together with the authorised state body in the field of labour, sectoral associations and employers.

4. Areas for further work

The next paragraphs identify several main areas of further work, which are closely related and therefore if one component is missing, this will certainly have an effect on the other components too.

Long-lasting political commitment. The implementation of VNFIL needs continuous political commitment. It may be that a country has an elaborated validation approach including developed draft laws, methodological framework, guidelines, etc. However, without political commitment, which is manifested in the adoption of necessary legislation (including bylaws and detailed regulations for implementation), institutional frameworks, quality assurance mechanisms and dedicated funding, the use of validation remains fragmented and unsystematic and therefore its respective impact is limited. Political commitment also means considering the principles of social dialogue, involving all relevant stakeholders like state institutions and agencies, social partners, third organisations, etc. in developing and subsequently in using validation arrangements. Making different stakeholders work together is challenging as they may have different understandings and interests in relation to validation.

Scaling up validation towards more comprehensive country approaches to VNFIL. All countries reviewed have sectoral approaches to implementing validation covering one or several sectors (typically, VET and the labour market) but none of them has an operational comprehensive approach for all the sectors. Ideally, a comprehensive approach is when procedures for awarding qualifications, certificates and occupational licences through VNFIL are mutually reinforcing and complementary in the labour market, the third sector and in the education and training system so that validation outcomes are transferable across sectors. In order to make validation approaches more comprehensive, Partner Countries may explore the following possibilities:

- seeking synergies between VNFIL and other policies such as those related to economic development, migration and active labour market measures (upskilling and reskilling);

- clarifying which target groups would benefit the most from validation and identifying priority target groups in accordance with national strategies and policies. For example, additional target groups may be adults with few qualifications, drop-outs, disadvantaged groups in rural/urban areas and circular migrants;

- supporting the use of validation through expanding the geographical scope of VNFIL services – in addition to the capital and other main cities, validation may be provided where there is increased need of it, such as in cities with a higher share of (circular) migrants or unemployed (young) people. Validation may need to be complemented by supporting measures like training and guidance provision, which in turn would require sufficient institutional capacities.

- opening possibilities for further learning pathways for beneficiaries that are not able to acquire a validation certificate, i.e. those could not successfully pass validation exams.

Stronger focus on the individuals and their learning paths. There is still room for improvement as regards the centrality of the individual in validation procedures in all Partner Countries studied. This can be achieved through improved targeting (which considers a variety of needs and diversified beneficiaries' profiles such as jobseekers, people exposed to poverty, informal workers, the low skilled, refugees, workers in gig economy, etc.) and a better understanding of (potential) beneficiaries' needs and circumstances through the use of career guidance services. For instance, some countries are likely to put more emphasis on assessment and certification while identification and documentation (that are more closely related to guidance) receive less attention. Initial training of practitioners involved in VNFIL is also mostly targeted at assessors while career guidance professionals and/or advisers are rarely aimed at (e.g. Georgia, North Macedonia). Of note is also that provision of follow-up guidance (i.e. upon finalisation of validation procedures and acquisition of a validation certificate) is largely missing. To conclude, depending on the country, regional or local contexts, employment services may play an important role in linking career guidance and validation services, while third organisations can contribute through reaching out to hard-to-reach target groups. Depending on the country context, employment services may play an important role in linking career guidance and validation services.

Development of institutional infrastructure and regulatory mechanisms. Although the lack of regulatory mechanisms is not necessarily an obstacle for using VNFIL, the adoption of legal regulations will certainly enable its implementation and thereby support a more systematic approach to validation. For instance, in Bosnia and Herzegovina, the development of VNFIL is linked to the development of the NQF, and the current dysfunctionality of the NQF represents the biggest barrier to the full development of VNFIL. The lack of a fully-fledged legislative framework in Morocco is the main hindrance to citizens being awarded full qualifications registered in the National Catalogue/repertory of qualifications attached to the NQF (Cadre national des certifications, CNC). Similarly, in Tunisia, a convincing VNFIL system has been developed, but not formally adopted, with the basic legal texts still missing.

Roles and involvement of national stakeholders must be clearly identified in regulations and guidelines. Once regulations are adopted, it is crucial that these clearly identify a responsible body managing VNFIL implementation. This may be under one of the ministries, an independent agency or a tripartite body. Regulations should also clarify the role of all stakeholders that may (potentially) take part in the implementation of validation arrangements such as different ministries, employer associations and employers, trade unions or the third sector. For instance, in Moldova, the legal framework initially specified all the obligations and responsibilities of VNFIL providers but not those of other relevant stakeholders such as the national employment agency, the Ministry of Economy, etc.

In countries where validation can be used in different sectors (e.g. education and training, labour market) the coordination between implementing bodies is key since these bodies might face differences regarding concepts, procedures and measures in applying validation. In turn, the differences may have an impact on the transferability of validation results from one sector to the other and vice versa.

The majority of the countries studied acknowledge the need for higher involvement of the private sector in validation. For example, in Kazakhstan and Kyrgyzstan (and the other Central Asian countries), a political priority in the area of qualifications is the development of SQFs under the respective NQFs. Since SQFs are based on occupational standards (updated or newly created), the whole process is likely to increase the involvement of the private sector in the area of qualifications and also in a validation context.

More diversified funding through dedicated budget lines. All countries reviewed lack a dedicated, sufficient and sustainable funding model for validation services and further system development. In most of them, the costs of the VNFIL procedure are covered by the applicant, which may be a barrier to accessing VNFIL. For instance, in Azerbaijan, validation of a full qualification costs around EUR 100 and of a partial qualification (module), EUR 80; the average monthly salary as of June was around EUR 500. In some countries, validation providers pay high costs for accreditation (e.g. Kosovo) and the price of VNFIL for individuals is left at the discretion of the provider, possibly making the service unaffordable.

Funding through fees tends only to cover assessment-related costs while overlooking the full costs related to VNFIL including outreach, information and guidance. Further developing the system requires investments in quality assurance, professional development of validation and guidance practitioners, needs analysis of potential target groups and provision of complementary training courses to candidates who have not fully succeeded in the validation process (ETF 2022a). Elaborating on these important components will require dedicated budget lines and exploring possibilities for synergies with other policies; ALMP funds could be allocated as subsidies for VNFIL for the unemployed, for example. Kosovo set a good example in this regard. Inclusion of validation in legislation as one of the active labour market measures assures free access of the registered unemployed to the validation service.

Funding of validation should also consider financial incentives – for employers, validation providers as well as individual candidates – as such incentives are currently very rare in the countries reviewed. For example, in Kyrgyzstan, where more than 70% of the labour force is involved in the informal economy, the introduction of incentives may be very beneficial for potential candidates with low incomes since they are not likely to invest in their skills development. In Moldova, validation centres at VET institutions are non-profit entities, thus certification fees cannot exceed the actual costs incurred.

Therefore, providers cannot accumulate income from this type of activity and thus there is no financial incentive for them to be involved in VNFIL. It shall be noted that a business case for validation providers has not been identified in any of the 16 countries explored, with the exception of Türkiye, which has partly solved the problem through the introduction of mandatory certifications for a range of occupations.

For all countries analysed, regional and international cooperation has been particularly important in the context of funding. International project support has been one of the main means for developing institutional infrastructure, methodological tools and also pilot activities. Further use of available EU support such as IPA funds, Erasmus+ funds and TAIEX projects can be particularly helpful for building institutional capacities and organising VNFIL peer learning activities. For example, the ongoing DARYA project (2022-2027) foresees capacity building activities and pilots in the area of VNFIL in at least three Central Asian countries.

Optimising quality assurance procedures related to VNFIL. In some countries the accreditation process for validation providers is lengthy and burdensome, which is due to efforts to avoid corruption. In these cases, it is important to find the right balance for accreditation procedures which are quality assured yet not too complex for providers (passing through various instances, paying several fees, etc.).

Furthermore, the optimisation of QA procedures relates to the development of relevant job profiles of validation practitioners in the field of career guidance and assessment. Most of the countries do not have any specific requirements for guidance practitioners, with the exception of Georgia and North Macedonia. In addition to defining the profile of validation practitioners, there is a need to develop relevant accredited training programmes; for instance, continuous professional development (CPD) provision to practitioners (both career guidance and assessors) is largely missing in the countries studied.

Country reports do not provide much insight on the quality of validation methods used. Only in the case of Georgia was it mentioned that examinations in general education mostly check knowledge of facts and fail to check higher skills. Therefore, it may be beneficial to adjust validation methods in terms of ensuring their quality and explore non-traditional assessment methods such as extracting evidence on competences based on portfolios rather than applying traditional examinations.

Establishing a system of data collection with clear monitoring and evaluation responsibilities and a straightforward reporting procedure making use of digital means. NQAs or ministries in charge of adult learning could play a role in setting such a system. The countries explored do not have a systematic approach to data collection, monitoring and evaluation in the field of validation, and therefore it is difficult to gain a precise picture on the extent to which VNFIL is implemented and how this has changed over time. Data reported on beneficiaries is partial since it does not cover all sectors where validation is implemented in a country and often there is socio-demographic data missing: age, gender, highest educational level completed, labour market status, citizenship status and follow-up quantitative or qualitative data (e.g. labour market status of the person six months or a year after obtaining a validation certificate). It is striking that beneficiaries' surveys have not been reported even for countries with a high number of beneficiaries. In Moldova, The Practical Guide for implementing VNFIL includes an example of a beneficiary feedback questionnaire, however it is not clear the extent to which the questionnaire is used.

Development of a digital structure that will support the implementation of VNFIL. Although some countries have reported using digital tools in supporting validation (online registration of candidates, examination through online tests), further opportunities can be explored concerning online process tracking, linking individuals' documentation (e-portfolios) to qualifications databases and units of learning outcomes and creating databases of certificates. Elaborating on the technical aspects of the validation system will depend on collaboration (including technical) between the parties involved. It is important that the use of digital tools by potential beneficiaries is adjusted to their digital literacy level. For instance, in Azerbaijan, validation candidates could only register online, which tended to exclude digitally illiterate people. Therefore, exploring the use of multiple channels (online, telephone, face-to-face) in providing information and advice to potential candidates may increasingly mobilise them in accessing validation services.

ACRONYMS

ACB	Authorised Certification Body (Türkiye)
AE	Adult Education
AEC	Adult Education Centre (North Macedonia)
AEPRO	Publicly Recognised Organisers of Adult Education (Serbia)
AL	Adult Learning
ANACEC	National Agency for Quality Assurance in Education and Research
CEDEFOP	European Centre for the Development of Vocational Training
CPD	Continuous Professional Development
CR	Council Recommendation
CVET	Continuous Vocational Education and Training
EaP	Eastern Partnership Countries
EARK	Employment Agency of the Republic of Kosovo
EQAA	Education Quality Assurance Agency (Azerbaijan)
ESA	Employment Service Agency (North Macedonia)
ETF	European Training Foundation
EU	European Union
GE	General Education
HE	Higher Education
HEI	Higher Education Institution
ISC	Independent Skills Certification (Kyrgyzstan)
ISCED	International Standard Classification of Education

IVET	Initial Vocational Education
LOs	Learning Outcomes
NEETs	Neither in Employment nor in Education or Training
NQA	National Qualifications Authority (Kosovo)
NQF	National Qualifications Framework
NQS	National Qualifications System
QA	Quality Assurance
RNFE	Recognition of Non-Formal Education (Georgia)
RVET	Regional VET Centre (North Macedonia)
RPL	Recognition of Prior Learning
SQF	Sectoral Qualification Framework
TQF	Turkish Qualifications Framework
TURKAK	Turkish Accreditation Agency
VAEP	Validation of Occupational Experiential Learning/Validation des acquis de l'expérience professionnelle
VNFIL	Validation of Non-Formal and Informal Learning

ETF Working together Learning for life
European Training Foundation

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