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signed by Mr Jordi AYET PUIGARNAU, Director

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to: Mr Uwe CORSEPIUS, Secretary-General of the Council of the European  
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IMPACT ASSESSMENT accompanying the document  
Proposal for a Council Recommendation on the validation of non-formal and  
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Delegations will find attached Commission document SWD(2012) 253 final.

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**COMMISSION STAFF WORKING DOCUMENT**  
**EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT**

*Accompanying the document*

**Proposal for a Council Recommendation**  
**on the Validation of non-formal and informal learning**

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## COMMISSION STAFF WORKING DOCUMENT

### EXECUTIVE SUMMARY OF THE IMPACT ASSESSMENT

#### *Accompanying the document*

#### **Proposal for a Council Recommendation**

#### **on the Validation of non-formal and informal learning**

This impact assessment accompanies the proposal for a Recommendation of the Council on the validation of non-formal and informal learning.

#### **1. PROBLEM DEFINITION**

Rapid economic and technological changes with increasing job transitions are pushing individuals to acquire higher qualifications and more generic skills. In this context education, training and qualifications systems need to recognise the full range of learning experiences (formal, non-formal, informal) through a learning outcomes approach. This can be done through the validation of non-formal and informal learning. This principle was adopted by the Recommendation on the European Qualification Framework (EQF) of 2008 to which this initiative is complementary.

Validation of non-formal and informal learning experiences has many benefits for:

- Individuals: enhanced employability, enhanced career prospects, increased wages, second chances for school dropouts, improved access to formal education and training, higher motivation to learn and increased self-confidence;
- The economy: a better skilled population, a better skills match on the labour market, transferability of skills between companies and sectors and more mobility on the European labour market, all of which contribute to a more competitive European economy and higher economic growth;
- The society at large: a better qualified population and workforce, a better access to further learning for disadvantaged groups and a more inclusive labour market.

The impact assessment defined two main problems to be addressed:

- (1) Validation opportunities are limited and underused in the majority of Member States. According to the 2010 update of the European Inventory on validation of non-formal and informal learning, Cyprus Greece and Hungary offer hardly any possibilities for validating non-formal and informal learning. Bulgaria, Latvia, Malta and Poland recently took steps towards the setting up of systems for the validation of non-formal and informal learning, but the validation system itself in these countries is still in its initial stage. In Austria, Belgium, the Czech Republic, Estonia, Italy, Ireland, Lithuania, Slovakia and Slovenia validation systems exist in one or more sectors, and are only used by small numbers of individuals. Also in countries with a more developed validation system such as Denmark, Germany, Luxembourg, Romania,

Spain, Sweden and the United Kingdom the take up rate of validation is still rather limited.

The limited and underused validation opportunities make that skills remain invisible and are not used to their full potential for the benefit of individuals, the economy and the society at large.

Three drivers for the limited availability and use of validation systems are the lack of trust in validation systems, processes and outcomes (confirmed by the public consultation held for the purpose of this initiative), the low awareness of validation possibilities in countries where validation opportunities exist (also confirmed by the public consultation) and cultural and attitudinal barriers towards validation of non-formal and informal learning. The first two drivers are addressed by this initiative.

- (2) A lack of comparability and coherence between the validation approaches of Member States. The current uneven availability and disparities between national validation policies and practices reduce the comparability and transparency of validation systems. They make it difficult for citizens to combine learning outcomes acquired in different settings, on different levels and in different countries. They create obstacles for the transnational mobility of learners and workers at times where such mobility is needed for creating more economic growth.

The Europe 2020 Strategy on smart, inclusive and sustainable growth stresses the need for more flexible learning pathways and sees validation of non-formal and informal learning as a pre-requisite for these. Validation will also contribute to achieving the EU headline targets as defined under Europe 2020 Strategy on early school leaving, on tertiary education attainment, on poverty reduction and on a high employment rate.

## **2. ANALYSIS OF SUBSIDIARITY**

Articles 165 and 166 of the Treaty on the functioning of the European Union (TFEU) foresee that the Union will contribute to the development of quality education and implement a vocational training policy by encouraging co-operation between Member States and, where necessary, supporting and supplementing their action, while fully respecting the responsibility of the Member States for the content of teaching and the organisation of education systems and vocational training.

The current initiative recommends lines of action to be implemented by the Member States with some European support. It proposes actions that will need implementation at Member State and at EU level. Member States will remain entirely responsible for the design, development and implementation of their arrangements (laws, regulations, collective agreements) for the validation of non-formally and informally acquired learning outcomes. The EU level will provide coordination – including in particular coordination with the relevant European instruments – and support by organising, for instance, peer learning activities. Action on both levels is complementary and the prerogatives of Member States are safeguarded.

## **3. OBJECTIVES OF THE INITIATIVE**

The general, specific and operational objectives of this initiative are the following:

### **General objectives:**

- (1) To provide citizens in all Member States with the opportunity to validate their skills acquired outside formal education and training systems;
- (2) To provide citizens with the opportunity of using their validated skills for working and learning purposes throughout Europe.

### **Specific objectives:**

- (1) To put in place systems for the validation of non formal and informal learning at national level linked to the National Qualifications Framework;
- (2) To establish an appropriate level of comparability and coherence between national validation systems linked to the National Qualifications Framework.

### **Operational objectives:**

- (1) To promote national qualification frameworks in a way that qualifications can be acquired through formal programmes as well as through the validation of non-formal and informal learning;
- (2) To provide mechanisms for the identification, documentation, and quality assured assessment and validation of skills acquired through non-formal and informal learning, taking advantage of common European instruments such Europass, ECTS, ECVET;
- (3) To allow individuals to have their skills and competences identified and documented without resulting into a formal qualification;
- (4) To extend and intensify the cooperation and exchange of good practice between Member States, supported by peer-learning activities and European reporting tools;
- (5) To raise the awareness of validation opportunities.

## **4. POLICY OPTIONS**

### **Option 1 (baseline scenario):**

This option consists of the continuation of the current situation which can be summarised as follows:

- Validation of non-formal and informal learning is taken into account in European policies concerning education and training, employment, youth and active citizenship;
- Existing European instruments, in particular the EQF Recommendation, call for the possibility to validate experiences acquired through non-formal and informal learning, without indicating how to do it;
- The Common European principles on validation adopted by the Council in 2004, the European guidelines on validation by Cedefop, as well as available funding through

the Lifelong Learning Programme, the future "Erasmus for All" Programme and the European Social Fund, as supporting tools for validation policy and practice in the Member States will continue to be relevant;

- Validation is part of the policy agenda in most Member States, but only implemented in a comprehensive way in a few Member States;
- Member States exchange experiences on validation under the Open Method of Coordination (in particular in the EQF Advisory Group).

### **Option 2 (Council Recommendation on the implementation of validation):**

Option 2 proposes political and practical measures to Member States, stakeholders and the Commission in the form of a Council Recommendation, as announced by the Europe 2020 flagship initiatives "Youth on the Move" and "Agenda for New Skills and Jobs". .

The Recommendation invites Member States to put in place mechanisms for the validation of non-formal and informal learning linked to national qualifications frameworks. These mechanisms should include quality assurance mechanisms, facilitate the portability of learning outcomes by using standardised documentation tools, raise awareness of validation opportunities, facilitate access to validation in particular for disadvantaged groups, ensure appropriate guidance to individuals and finally provide the opportunity to individuals to undergo a skills audit within three months of an identified need.

The Recommendation stresses the need to involve labour market stakeholders (e.g. to record learning outcomes acquired in the workplace), as well as education and training providers (e.g. to provide opportunities to gain access to formal education and training) and the third sector (e.g. NGO/volunteer organisations).

The Recommendation will be complemented by more intensive cooperation on the validation of non-formal and informal learning within the existing EQF Advisory Group as Open Method of Coordination structure. The Recommendation invites the Commission to regularly update the European Inventory and the European Guidelines on the validation of non formal and informal learning and to support the implementation of the Recommendation by organising effective peer learning activities.

The Council Recommendation is expected to be approved in 2012, with an implementation of the proposed mechanisms by the Member States and the European Commission from 2013 onwards.

### **Option 3 (A new Open Method of Coordination devoted to validation aimed at the development of a European Quality Charter on validation):**

Under Option 3 Member States will work together, in a new Open Method of Coordination (OMC) specifically devoted to validation, aiming at the setting up of a European Quality Charter on the validation of non-formal and informal learning.

The European Quality Charter will be formulated around the following lines: quality ensured validation procedures, quality standards for assessors, guidance and counselling, access to validation, stakeholder involvement, specific target groups and the European dimension of validation.

The European Quality Charter will build on both European (e.g. European guidelines and the common European principles on validation) and on national initiatives (public and private) related to quality assurance in the area of validation. A European Quality Charter will contribute to building trust and confidence between Member States.

The new OMC process will consist of a new set of reporting mechanisms by Member States and monitoring of progress by the Commission. Dedicated OMC mechanisms are expected to be in place in 2012, leading to the approval of the Charter in 2014. Its implementation will follow from 2015 onwards.

## **5. ASSESSMENT OF IMPACTS**

Appropriate action by the Member States, through the creation of more validation opportunities, allowing for the use of available knowledge, skills and competences to their full potential, will have significant economic and social impacts. There will only be limited environmental impacts.

The social, economic and other impacts have been examined in qualitative terms based on likely impacts, as there are no hard data available. For each of the likely impacts a comparison with the baseline scenario has been made.

The most important economic and social impacts of setting up comprehensive validation systems are:

- A positive contribution to economic growth and employment through a better use of available skills in the labour market and through more skills development;
- A better access to the labour market and easier job transitions, through the inclusion of all available skills in recruitment decisions and for occupational changes;
- A better access to further learning through a better recognition of prior learning experiences by education and training institutions;
- Better information on available skills which become more visible thanks to more validation opportunities;
- A higher education level of workers (both through the validation of existing skills and through a better access to further learning);
- Potentially better working conditions for individuals thanks to higher qualifications;
- Improved equality and social inclusion by creating more opportunities for validation of non-formal and informal learning for disadvantaged groups;
- A higher mobility of workers across Europe, beneficial for economic growth.

The realisation of the expected impacts will depend on a number of factors such as the concrete implementation by Member States of the recommended measures (Option 2) and the way in which Member States will effectively work towards a European Quality Charter on validation (Option 3). It has been assumed that the set of recommendations addressed to Member States under Option 2 will have more immediate effects on the creation of validation

opportunities than the newly created OMC under Option 3 which does not include a set of recommendations to Member States.

Ongoing developments of National Qualification Frameworks will benefit from the measures proposed under Option 2 which will be able to deliver concrete outcomes already in 2013. Immediate effects are also relevant for reaching the Europe 2020 targets in time and therefore expected immediate impacts received higher scores than impacts expected in the longer term.

The real costs of putting in place validation mechanisms depend on a number of factors such as the readiness of the current system (existing infrastructure: institutions, assessment and certification procedures and standards), the scale of validation arrangements (focus on all occupations or on specific occupations), and the target groups of validation (all citizens or specific target groups).

On the basis of available evidence, the full costs for a validation procedure leading to a full or partial qualification vary from 800 to 1,800 EUR depending on the country and the type and level of qualification. Investment in validation of non-formal and informal learning leads to cost savings on formal education and training for individuals who will obtain a qualification on the basis of their learning obtained through non-formal and informal learning, without the need for further formal education and/or training.

The resulting net costs of validation have to be weighted against the benefits of validation. The impact assessment assumed that in all three options the aggregate benefits of validation altogether outweigh the net costs of validation in terms of e.g. improved employability, enhanced career prospects, improved skill matching, more economic growth, better social inclusion.

## **6. COMPARISON OF OPTIONS**

Option 2, a Council Recommendation on the implementation of validation, results as the most effective and efficient option. Option 2 is also the most coherent with EU policy objectives and with the largest positive economic and social impacts.

Under Option 1, the current situation of validation is expected to change only slowly, implying that the limited availability and use of validation of non-formal and informal learning experiences, as well as the lack of a comparable and coherent approach in validation across Europe, will remain.

Option 3 (a new OMC) is expected to lead to improvements compared to the baseline scenario regarding impacts effectiveness, efficiency and coherence with wider EU policy objectives. However the setting up a new OMC creates additional structures and additional reporting mechanisms, increasing the administrative burden and costs for the Member States. Moreover due to its exclusive reliance on the OMC method there is more uncertainty as to the concrete action is taken by and in the Member States as well as to the timeframe of such measures.

Apart from impacts, effectiveness, efficiency and coherence with EU policy objectives, the main assets of Option 2 are:

- It will fill the "validation gap" which currently exists within the available European tools and instruments such as the EQF, Europass and credit systems. It will in particular fill the missing link in the European Qualification Framework which



provides for the promotion of validation of non-formal and informal learning, without further guidance on its implementation;

- It proposes concrete practical measures for implementation of validation in the Member States;
- A Council Recommendation, as legal instrument, signals the commitment of Member States towards the measures indicated, most of which will require implementation at national level and adapted to the national context;
- It explicitly involves relevant stakeholders (labour market stakeholders, youth/voluntary organisations, education and training institutions) in the development of validation systems;
- Member States will continue to cooperate within existing OMC structures, in particular the EQF Advisory group, representing a more simple implementation structure than foreseen under Option 3;
- It will form a new and stronger political base for cooperation in the field of validation of non-formal and informal learning.

## **7. MONITORING AND EVALUATION**

Under the initiative monitoring will take place on the basis of the use of existing tools. This will limit its costs for monitoring as well as the administrative burden to the Member States.

The European Inventory on Validation, under the responsibility of the Commission and of Cedefop, will be further consolidated and strengthened in view of the monitoring the implementation of the Council Recommendation by the Member States.

The annual Cedefop report on the development of national qualifications frameworks in Europe will be used for assessing the progress achieved by Member States in creating validation of non-formal and informal learning as a pathway to obtain a qualification.

Member States will report on their implementation of the Recommendation through their national progress reports already planned in the context of the Education and Training Strategic Framework 2020 (next reporting year: 2014).

Finally the initiative foresees to strengthen peer learning, involving governmental actors and stakeholders, focussed on the exchange of experiences and demonstrations of good practice. Given the close relationship between the initiative and the Recommendation on the European Qualifications Framework, the EQF Advisory Group is the most appropriate body for those activities

An external evaluation of the Recommendation's implementation is planned within four years after its adoption.