
VALIDATION OF NON-FORMAL LEARNING: OPPORTUNITIES FOR DISTANCE EDUCATION

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The vast array of educational resources available on the internet means that individuals can access learning opportunities in a way not previously possible. But how can this *free range learning* (Cross, 2007) be translated into formal qualifications or credentials? Some of innovative distance learning opportunities are already being formally recognized. For example, many higher education institutions offering MOOCs are increasingly providing an opportunity to earn academic credit towards a degree, such as in the Virtual Mobility Passport project (Tovar, 2014). Nevertheless, much learning from online educational resources remains invisible on a transcript or resume. In *Edupunks' Guide to a DIY Credential*, Kamenetz (2011) posited that a motivated learner can use internet learning to earn a credential from a recognized formal education institution. The vehicle that she recommends to have such learning assessed and accredited is called Validation of Non-formal and Informal Learning (VNFIL) in Europe.

VNFIL, by no means new in Europe, has gained a new significance with the development of qualification frameworks (Harris, 2011). The growth of qualification frameworks in Europe has been exponential; there were three frameworks in 2004, now there are at least 36. VNFIL has been identified as a European priority on repeated occasions, notably in the Communication on Lifelong Learning (2001), the Copenhagen process on increased cooperation in VET (Declarations 2002, 2004, 2006, 2008 and 2010), in the Recommendation on the European Qualifications Framework (2008) as well as in the ministerial declarations of the Bologna process (2007 and 2009). Alongside these general landmarks has been a raft of specific policies. According to the recent Inventory on Validation (Cedefop, 2014; p.5)

“Prior to 2010, various steps had been taken to stimulate and guide developments in the area of validation in Member States, including the 2004 Common European Principles [...] the 2008 Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning, [...] and the 2009 European guidelines for validating non-formal and informal learning...”

The Inventory then notes that the most important development in the European context since 2010 has been the adoption of the 2012 Council Recommendation on the validation of non-formal and informal learning. This calls for Member States to put in place, by 2018, arrangements to enable individuals to have their knowledge, skills and competencies acquired

via non-formal and informal learning validated, and to be able to obtain “a full qualification, or, where applicable, part qualification on the basis of validated non-formal and informal learning experiences”.

In this paper, we seek to unpack concrete actions and practical initiatives in relation to the recognition of non-formal learning (RNFL) as a distinct and discrete part of VNFIL. We describe current opportunities available in Europe for providers of non-formal (NF) distance education to have their offerings formally recognized, through a process termed generically as program review. The process of awarding institutional credit for pre-assessed training from selected employers, private training organizations and/or Continuing Studies programs is termed *program review*. A systematic approach to gauging levels and specifications of credits, program reviews provides an effective way to scale up VNFIL by operating at the level of the qualification rather than the individual. Although these initiatives are not specific to distance education, they do offer providers of distance NF education a chance to enhance the stature of their offerings, increasing the value to both learners and themselves.

Methodology and terminology

This paper is based on desk research and on informal enquiries sent to a selected group of VNFIL-related policy-makers and practitioners in Europe. Proceeding in an iterative way, after a preliminary literature review, more focused email contact was made with key individuals who in turn, made referrals to colleagues and members of the European Qualifications Framework Advisory Group (EQF AG). This led to new literature and further contacts.

Generally, a consensus exists that NFL is intentional (on the part of the learner) and that is not currently part of formal, regulated education and training provision. Some definitions (e.g. Cedefop, 2009) refer to NFL as ‘not explicitly designated as learning (in terms of learning objectives, learning time or learning support)’, whereas others take the position that NFL is planned and supported pedagogically, whether at a distance or face-to-face. Moreover, definitions vary as to whether to qualify as non-formal the learning needs to have been subject to some form of assessment, quality assurance or certification. Given these contestations, the definition adopted here follows the Scottish Credit and Qualifications Framework (SCQF) and is deliberately broad: NFL is learning that “is organised but may or may not be certificated, and which may or may not be recognised on the SCQF”:

“This type of learning could be gained through a range of organised learning experiences, for example training which is organised by your employer or a community learning programme. Learning of this type normally has clear learning objectives and some learning support would normally be provided (for example workshops, presentations, or project work). It may or may not be assessed. Learning of this type is normally delivered outside of formal learning institutions such as schools, colleges or universities, although sometimes learning may take place using the facilities of these institutions” (SCQF, 2015).

Recognition of non-formal learning (RNFL) at systemic and national levels

While individual institutions often recognize NF education delivered through distance (e.g. Thompson Rivers University in Canada accepts Microsoft certifications for academic credit), national systems are an emerging trend. The United States (US) has long-established and well-documented mechanisms for RNFL. The Credit Recommendation Service (CREDIT) of the American Council on Education is a national player, alongside numerous nationally standardized exams (CLEP, DANTES etc.). Initiated in 1974, CREDIT has assessed over 4000 programs, recorded in their searchable, on-line database, and has a network of over 2000 colleges and universities that accept their credit recommendations for NF offerings. For example, *Saylor Academy*, a non-profit provider of on-line open courses, has had some of their offerings reviewed and recommended by CREDIT, as has *Straighterline*, a for-profit provider of on-line courses at the introductory college level.

South Korea has an established Academic Credit Bank System (ACBS) since 1998, which had served 50,000 learners by 2013, offering credits for non-formal learning towards Associate and BA degrees (Park, 2011). ACBS certifies NF training; the process allows the recognition of distance education courses/programs for academic credit.

In Europe, evidence does suggest that RNFL is relatively under-developed as a systematic, national practice. Perhaps the most important recent initiative was a 2014 conference held in the United Kingdom *Making Learning Visible*. The conference demonstrated that RNFL is gaining a distinct place, on its own terms, separate from the recognition of informal learning. Referring to the opening up of qualifications frameworks to non-formal certificates and to international qualifications, keynote speaker Jens Bjornavold noted: “I would say approximately half the countries are working seriously on this question – how can we involve qualifications from the private sector, from the voluntary sector, from international organisations, how should we do that?” (EC, 2014a; p.60). The conference and final report highlighted program review-type initiatives in the European Community (EC, 2014b).

In England, Wales and Northern Ireland, an *exemption facility* allows individuals with certified non-formal achievements to progress within the Qualification and Credit Framework (QCF) but without being awarded official credit. Exemptions can be initiated by awarding organisations (i.e. bodies providing accreditation) or by individual learners. The procedure involves the awarding body having “a process for determining the quality of any units, qualifications or other certificated achievement awarded outside the QCF”. In the UK, awarding organisations are regulated by the Register of Regulated Qualifications. Awarding organisations include universities and colleges (public and private), occupational bodies, professional bodies and agencies, and skills councils. Because the exemption facility is related to the QCF as a whole, it is highly regulated, complex and consequently, used primarily by large-scale training vendors such as Pearson Education.

The Open College Network (OCN) in the UK has a rich and very collegial history (since the 1970s), offering recognition and accreditation for a range of locally designed learning programmes delivered through distance and face-to-face, in a range of settings, including workplaces, voluntary and community organisations (UDACE, 1992; p.28). The OCN accreditation framework consists of four levels (based on complexity and autonomy), an agreed definition of credit, recognition by peer group panels, and mutual recognition of the credits issued by all members of the National OCN. NF education can be mapped onto units/learning outcomes at different levels and credited accordingly. When populated with such programs, the accreditation framework has increasingly acted as a curriculum framework and a menu from which to construct more programs, packages of learning or specific learning interventions designed to fill gaps. Many OCN providers have subsequently become formalized as awarding organisations offering regulated qualifications alongside the recognition of non-formal education programs.

In Wales, an inclusive national framework, the CQFW, the Credit and Qualifications Framework for Wales, embraces all types of learning and allows:

“comparison of achievements from different education and training activities, recognition of full and partial completion of qualifications and brings in the vast range of education and training activity within and outside the regulatory and funding arrangements” (EC, 2014b; p.33).

Learning programs are categorized as: higher education, general and vocational education, or lifelong learning. But it is only the lifelong learning *pillar* that takes account of non-formal learning. An agreed national approach builds on OCN Wales through a framework now called Quality Assured Lifelong Learning (QALL): “The QALL process will measure the learning that has taken place, quality assure it and award credit for it”. To be recognized within QALL, learning has to be captured in *units*. Providers of, for example, in-house company training or continuing professional development usually work with a *Recognised Body* to draft these units which are then submitted for approval. Once units are approved they can be used by other awarding organisations.

In Scotland, the Scottish Credit and Qualifications Framework (SCQF) is “a lifelong learning Framework that includes an increasing range of general, vocational and academic qualifications and learning programmes”, including non-formal learning (EC, 2014;, p.49). Over 400 NFL programs are already registered on the SCQF database, from levels 2 to 11, ranging from 10 to 1000 notional learning hours. Providers of these programs include employers, trade associations, trade unions, youth organizations, community organizations and adult education organizations. Each non-formal program is awarded a level and a number of credit points. This is called *credit rating* and is undertaken by Credit Rating Bodies (CRB). All further education colleges and higher education institutions are CRBs, as is the Scottish Qualifications Authority (SQA), and a number of approved bodies such as City and Guilds. All CRBs have to have robust quality assurance systems that are moderated by an external quality assurance body. To qualify for inclusion in the Framework, a non-formal learning

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program needs to be outcome-based, more than 10 hours (one credit), formally assessed, and, internally and externally quality assured. Microsoft followed this route to formalize some its on-line certificates, working with the University of the West of Scotland as CRB; each recognized certificate is evaluated at Level 5 (Associate Degree) of the European Qualification Framework, worth 15 credits.

In the Netherlands, NFL qualifications can be recognized on the Netherlands Qualifications Framework (NLQF). Since 2013, the NLQF has adopted a binary system: (a) qualifications regulated by the public sector i.e. ministries, and (b) *other qualifications* i.e. non-formal qualifications awarded by the private sector, outside the formal system, and related to the labour market. It is argued that the inclusion of the latter in the NLQF will “increase their visibility and further strengthen their value” (EC, 2014b; p.63). The format for *other qualifications* is based on sector standards, encompassing *function profiles*, *career-paths* and *citizenship-activities*, and involving labour market stakeholders in their derivation – therefore closer to employers and their needs. The classification of non-formal qualifications into the *other qualifications* arm of the NLQF consists of two stages: (a) an *audit* or accreditation of the provider organization, particularly its quality assurance procedures; (b) after being accredited for five years, the organization can submit its qualifications for approval, indicating “the qualification level it sees as most appropriate” (EC, 2014b; p.64), the learning outcomes oriented to the NLQF level descriptors, the notional workload involved, and the assessment procedures – which are evaluated by expert committees, and if successful, placed on the register. To date, ten companies and nine qualifications have been registered in this way.

Recognition of non-formal learning in particular sectors and professions

There is evidence that an increasing number of professional bodies wish to register their non-formal education or training in qualifications frameworks “enabling national and international recognition” and permitting them to present a transnational picture when marketing their programs. Armstrong and Fukami (2009; p.543) argued that:

“Accreditation of non-formal management education and development programmes is only half of a measure, necessary but not sufficient. It is time also to look at the other end of the pipe: What competencies are actually acquired by graduates of the non-formal management education and development programmes? [...] [T]he institutional arrangements and basic infrastructure for quality assurance for this sector are yet to be completed”.

The authors point to a need for third-party, profession-specific organizations to quality assure and enhance all aspects of the design and delivery of non-formal learning programs, citing ACCET in the US which specializes in guidelines for continuing education, and accredits training from trade and professional associations, corporate training departments and trade unions. But, ‘looking at the other end of the pipe’ suggests that providers of NFL may choose to formalize their own offerings rather than rely on a third-party to do that with/for them.

Discussion and conclusions

We have briefly reviewed European initiatives that offer providers of distance education to have their non-formal offerings recognized towards formal qualifications. While these opportunities are also available to face-to-face providers, distance education and particularly open distance education is much more likely to attract free-range learners who later want to have their learning recognized. The emerging opportunities for recognition through a VNFIL process of program review are thus particularly germane to distance education providers of NFL.

On the plus side, formally recognizing non-formal learning programs advances a strong message about credibility, ownership and value for providers. It helps employers to understand the amount of learning, knowledge, skills or competence needed to achieve the qualification. It aids marketing, and extends the reach of programs to local, transnational and international markets. It encourages partnerships between different levels of provider. It becomes possible for tailor-made programs related to specific learners and fields of learning to gain visibility and currency. Trainers and assessors involved in NFL can become up skilled by the support they are given. Most importantly, it facilitates progression for learners.

There are obvious challenges associated with RNFL. To be formally accredited, especially directly into a framework, NFL programs and providers have to be subjected to the same regulatory processes as formal learning. This involves learning outcomes, and assessment and validation processes that satisfy quality assurance requirements. It also necessitates resources, expertise, capability and capacity. It was noted in the 'Making Learning Visible' conference discussions that some NFL programs may not make it into a framework not for lack of quality, but for lack of administrative expertise. Questions of final ownership of the qualification are also raised.

Although European qualifications frameworks and credit systems are increasingly open to registering the outcomes of non-formal learning, the current state of play is mixed. Long-standing voluntary and non-regulated initiatives such as Open College Networks (in the UK) have stood the test of time, for over four decades. Although some of them have become formalized as awarding organizations (or their equivalent), their role and the role of other third-party organizations in managing, endorsing or mediating the process of recognition or accreditation of non-formal learning has remained constant, be that at systemic, institution, sector or profession levels.

It is clear that more flexible and less formalized arrangements unquestionably suit certain constituencies and stakeholders e.g. employers who do not wish or need to be subjected to layers of verification and bureaucracy, especially when their programs change:

“Organisations that have chosen to put their own non-formal programmes into the Framework in Scotland and Wales don't always want to make the shift across to formal qualifications as it actually places extra constraints on the qualification and closes down the innovation. They want to stick with

what they have because they own it, they shape it and they don't have to conform to a particular size, shape or structure.” (EC, 2014a; p.46).

Questions continue to be raised regarding the efficacy of regulating non-formal programs: as a participant at the *Making Learning Visible* conference put it, “our need to regulate is perhaps greater than the learner’s need to have a regulated qualification” (EC, 2014a; p.45). On the other side, concerns are expressed about whether RNFL puts the quality, the credibility of the frameworks and national qualifications at risk, and whether certification is becoming more important than learning. Much depends on the nature of the Framework it seems.

David Raffé’s (2013) taxonomy of qualifications frameworks is extremely pertinent in terms of understanding the most suitable approach to RNFL. He distinguishes between three types of framework:

1. A *communications* framework that starts from an existing system, (re)describes it, aims to make it more transparent, supports rationalisation and coherence. The framework is seen as a tool for change rather than a driver of change.
2. A *reforming* framework also starts from the existing system, aims to make it more transparent but also to achieve specific reforms, e.g. fill gaps, improve quality, update standards. The qualifications framework therefore provides an opportunity to change existing education and training and becomes a reference point for reform. In such cases the framework is given a regulatory role where it will directly influence the design, provision and award of qualifications.
3. A *transformational* framework starts with a vision of a desired future system and aims for radical change. The framework defines the qualifications it would like to see in a transformed system assumes a strong central role as a driver of change.

According to the Cedefop (2009), the SCQF is a communications framework; England, Wales and Northern Ireland fall the reforming category (as does France and the Republic of Ireland). Transformational frameworks tend to be adopted in countries where the existing education and training systems are weak or not trusted (as in South Africa for example). The general view is that communications frameworks are more successful, but of course that may be because they are less ambitious. Evidence suggests that RNFL works best with communications frameworks that are less strongly regulated, such as the SCQF, where, it is hoped, credit decisions can be based on slightly more pragmatic criteria i.e. on agreements to treat particular qualifications as broadly equivalent, regardless of differences of content, rather than be based on technical criteria where more fundamental technical work is needed to identify exactly what each qualification represents, and to agree equivalences on that basis. In essence, RNFL is not used as much as it could be, and where it is it is mired in bureaucracy. As a result, much learning remains unrecognized.

Given that European countries are increasingly emphasising the need to recognize the full range of an individual’s knowledge, skills and competences, individualized approaches are not an adequate means to meet this challenge. There is a need and a place for more initiatives that

recognize non-formal education and training, such as the OCN. By that we mean, loosely regulated, third-party arrangements that can deploy the pragmatic criteria referred to above, that can work by consensus from the bottom up, fit-for-purpose quality assurance processes can be used, numbers can be kept small initially so that non-formal learning processes can be easily managed.

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