

The implementation of validation arrangements in Norway

One-off report to the European Commission according to Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning (2012/C 398/01)



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Skills Norway

Preface

The Council Recommendation on the validation of non-formal and informal learning (2012/C 398/01), recommending that all member states should have validation arrangements implemented by 2018, was included in the EEA agreement on 25 September 2014.

This report presents the status of implementation of validation arrangements in Norway by 2018. The report is structured according to the outline agreed in the EQF Advisory Group.

The 2012 Council Recommendation on validation draws up a number of important factors in building a sustainable and accessible system for validation. In Norway, a validation system based on the agreed common principles has been under development for many years, as part of overarching lifelong learning policies. With the renewed focus on validation, underlined by the 2018 deadline set in the Recommendation, it is interesting to note that although the system as such is in place, challenges remain as for implementation. Validation is a long-standing topic of discussion also in tripartite cooperation, which is reflected in the Norwegian Strategy for Skills Policy 2017–2021.

Skills Norway has produced this report by mandate from the Ministry of Education and Research.

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General features of the validation arrangements

1.1 What is validation in Norway?

In Norwegian legislation and practice, validation comprises all prior learning, i.e. formal, non-formal and informal learning. In terms of validation, there is no distinction between these different kinds of learning, as it is not seen as useful to identify in which arena the learning has taken place. The individual's "realkompetanse" encompasses all learning. In this report, this concept will be denoted by the acronym VPL (validation of prior learning), to signal a wider inclusion of learning than VNFIL (validation of non-formal and informal learning).

VPL in Norway is only available in the formal education system, since the only standards for VPL today are the learning outcomes described in formal curricula and study programmes. There are laws and regulations in place relating to each level of education and training, providing a general framework for VPL. Initial vocational education and training (VET) is included in the formal education system at upper secondary level, and as such makes VPL available for all vocational education and training at this level.

In Norway, validation of prior learning was introduced as part of overarching lifelong learning policies. These were launched through the 1998 White Paper on the Competence Reform ('Meld. St. 42 (1997–98) *Kompetansereformen'*) and were again underlined in the 2009 White Paper *Education Strategy* ('Meld. St. 44 (2008–2009) *Utdanningslinja'*). The latter pointed out the importance of validation as a means to strengthen social equality, and the need for equal practice in validation processes throughout the country. The focus on qualifying adults was renewed in the 2016 White Paper *Social inclusion and a second chance* ('Meld. St. 16 (2015–2016) *Fra utenforskap til ny sjanse'*), in which flexible provision for adults and cross-sectoral cooperation were important issues. In 2017, the Government and the social partners agreed on a Norwegian Strategy for Skills Policy (Nasjonal kompetansepolitisk strategi 2017 – 2021), in which validation of prior learning is mentioned as an important method for recognising workplace learning as a basis for flexible learning pathways leading to formal qualifications.

Statutory rights for adults to complete **upper secondary education and training** were introduced in 2000, and for **primary and lower secondary education** in 2002. The statutory right to attend and complete education at these levels entails a right for those concerned to access validation for free.

In **post-secondary vocational education and training**, validation for admission purposes was introduced with the original law for this level in 2003, whereas the possibility to grant exemption from parts of programmes on the basis of validation was introduced through regulation in 2013. The 2016 White Paper *Skilled Workers* for the Future ('Meld. St. 9 (2016 – 2017) Fagfolk for fremtiden') defined the status of post-secondary vocational education and training. In 2018, the provisions on validation of prior learning for exemption from parts of programmes were included in a new law, and in March 2019, proposed new regulations, including a definition and further provisions on validation, were sent on public consultation until June.

Since 2001, adults without sufficient formal qualifications can have their prior learning assessed in order to gain admission to **higher education**, or to be exempted from parts of study programmes. Since 1 January 2019, new regulations for exemptions clarify how to grant exemptions based on prior learning.

With the 2018 and 2019 changes in laws and regulations for post-secondary and higher education, respectively, the legislative framework for validation will reach full coverage and also improved quality.

1.2 Description of the legal, institutional and financial background

Validation of prior learning is possible at all levels of formal education and training in Norway. VPL can be used to give access to education and to acquire modules and/or full qualifications. The qualifications are described in the Norwegian Qualifications Framework (figure 1).

In **primary and secondary education**, VPL is regulated by national regulations¹ stating that adults with a legal right to education at this level also have a right to validation. In **upper secondary education**, adults without this legal right shall be validated if referred through social services or public employment services.

In **post-secondary vocational education and training,** VPL is regulated by law² stating that adults from the age of 23, without the required formal qualifications, may be validated for admission to studies. Students can also be exempted from parts of a study programme based on their prior learning. In **higher education**, VPL is regulated by law³ stating that adults from the age of 25, without the required formal qualifications, may be validated for admission to studies. Students can also be exempted from parts of a study programme based on their prior learning.

The Norwegian system of validation is based on shared principles at all levels of education. Central among these principles is that the validation process should be voluntary and of benefit to the individual.

At the national level, the Ministry of Education and Research implements government policy and administers laws for VPL. Skills Norway (former Vox) has a cross-sectoral role in the field of validation; its work includes contributing to increased knowledge and awareness of the value of validation. It proposes measures to the Ministry of Education and Research and sets up relevant projects in response to these. Over the years, Skills Norway has run networks and projects and reported on practice linked to VPL. Most recently, Skills Norway initiated a comprehensive study on the status of VPL in Norway, investigating the use, challenges and effects of VPL. In June 2018, the Nordic Institute for Studies in Innovation, Research and Education (NIFU) submitted the final reports *A study of the system for VPL in education and working life* (NIFU 2018:10)⁴ and *VPL in practice, experience from case studies* (NIFU 2018:11)⁵, which in turn have informed this report, along with other studies and surveys.

The Norwegian Directorate for Education and Training has the national responsibility for validation of prior learning in primary, lower and upper secondary education and training for adults. The directorate follows up laws and regulations in this field and supervises local provision. In post-secondary and higher education,

¹ Forskrift til opplæringslova, §§ 4-3 and 4-4:

https://lovdata.no/dokument/SF/forskrift/2006-06-23-724/KAPITTEL_5#KAPITTEL_5

² Fagskoleloven: §8 (exemption), § 16 (admission):

https://lovdata.no/dokument/NL/lov/2018-06-08-28?q=fagskoleloven

³ Universitets- og høyskoleloven: §3-5 (exemption), § 3-6 (admission): https://lovdata.no/dokument/NL/lov/2005-04-01-15

⁴ NIFU 2018:10 https://brage.bibsys.no/xmlui/bitstream/handle/11250/2502219/NIFUrapport2018-10.pdf?sequence=1&isAllowed=y

⁵ NIFU 2018:11 https://brage.bibsys.no/xmlui/bitstream/handle/11250/2502220/NIFUrapport2018-11.pdf?sequence=1&isAllowed=y

the Norwegian Agency for Quality Assurance in Education (NOKUT) has the responsibility for quality assurance, supervision and accreditation, and is an important partner for the institutions in their quality work.

Figure 1 The Norwegian qualifications framework (NKR)

NQF levels	Qualifications		
1			
2	Certificate for primary and lower secondary education		
3	Certificate of Competence, partially completed upper secondary education (Kompetansebevis)		
4	4.A Certificate for upper secondary education and training (vocational) Craft/trade certificate Journeyman's certificate (Fagbrev, svennebrev)	4.B Certificate for upper secondary education and training (general)	4
5.1	Higher vocational education: (partial level qualification) Diploma for higher vocational education/professional degree (30 – 90 credits)		
5.2	Higher vocational education: Professional Degree Diploma (90 credits) Higher Professional Degree (120 - 180 credits)		
6.1	University College degree (partial level qualifications) (Høgskolekandidatgrad)		
6.2	Bachelor's degree General teacher education (4-year programme)		
7	Master's degree Master of Arts Master of Business Administration (MBA) Master of International Business (MIB) Master of Technology Management Master i rettsvitenskap (law) Candidata/candidatus medicinae (cand.med.) Candidata/candidatus medicinae veterinariae (cand.med.vet.) Candidata/candidatus psychologiae (cand.psychol.) Candidata/candidatus theologiae (cand.theol.)		
8	Philosophiae doctor (ph.d.) Doctor philosophiae (dr.philos.) Diploma, artistic development programme Philosophiae doctor (ph.d.) in artistic development work		8

Source: Lovdata.no

Since the early 2000s, adults have been given statutory rights to education and training, including VPL, at the primary and secondary levels. This statutory right presupposes that the adult has not completed education at this level. A recent amendment to the Education Act⁶ (01.01.2018) extends adults' right to VPL to include immigrants who have an education from their home country which is not officially approved in the Norwegian education system at these levels.

In **primary and lower secondary education**, provision of VPL is the responsibility of the municipalities, as they provide education at this level. The main target group is immigrants who need to document completed lower secondary education to be able to access upper secondary education. The Norwegian Directorate for Education and Training has developed national guidelines for VPL to support local practice⁷. National statistics show that only 2% of participants in adult primary and lower secondary education had validation of their prior learning in 2016/17⁸. However, there are reasons to believe that national statistics are not fully reliable in this respect due to varying, or lacking, routines for registering data in the different municipalities⁹.

In **upper secondary education and training**, VPL provision is the responsibility of the counties, which provide education at this level. Each county has established a system for VPL and additional education and training, if needed. In some counties, there is close cooperation between the county's adult education centre and the career guidance centre. The Norwegian Directorate for Education and Training has developed national guidelines for VPL in upper secondary education and training to support local practice¹⁰. National Statistics show that the number of validations is quite stable or slightly decreasing. Table 1 (below) shows that there was a considerable drop in numbers from 2009 to 2010. This is partly because the large groups of experienced workers who got the opportunity to obtain VPL in the early years of this provision, had gone through the process, and that the situation in 2010 was 'back to normal' concerning the target group for VPL at this level. However, national statistics for VPL at upper secondary level are not fully reliable due to very different reporting procedures in the different counties¹¹.

⁶ § 4A-3 https://lovdata.no/dokument/NL/lov/1998-07-17-61/KAPITTEL_5#KAPITTEL_5

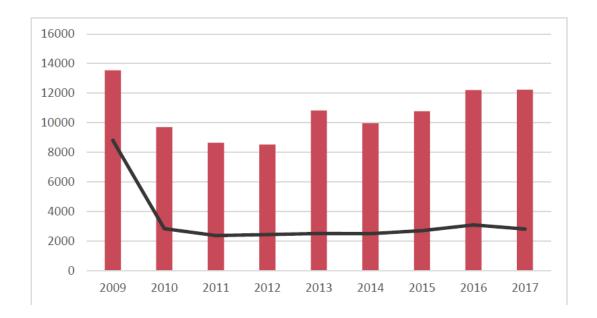
⁷ https://www.udir.no/globalassets/filer/regelverk/tolkningsuttalelser/udir_retningslinjer-for-realkompetansevurd_web.pdf

⁸ Skills Norway Statistics Bank (in Norwegian) http://status.vox.no/webview/?language=no

⁹ NIFU 2018:10, chapter 4.2.1.

Table 1
Total number of adult students in upper secondary education (red column) versus number of adult students in upper secondary education who have gone through VPL (black line).

Source: NIFU 2018:10 (p. 48)



In **post-secondary vocational education and training**, validation for admission purposes was introduced with the original law for this level in 2003. Like in higher education, VPL is the responsibility of each institution. As part of the follow-up of the 2009 White Paper Education Strategy, Skills Norway developed national guidelines for VPL towards admission¹² to support local practice, in cooperation with representatives from the sector.

National statistics show that the number of validations for access is stable, and concern approximately 10% of the total number of students every year¹³. However, a survey made by Vox (now Skills Norway) reported that the number of students admitted on the basis of validation varies greatly between the different professional trades¹⁴, and the recent NIFU report confirms these differences in admission, both by trade and by institution ownership (private/public), as shown in table 2 and 3 below.

¹²

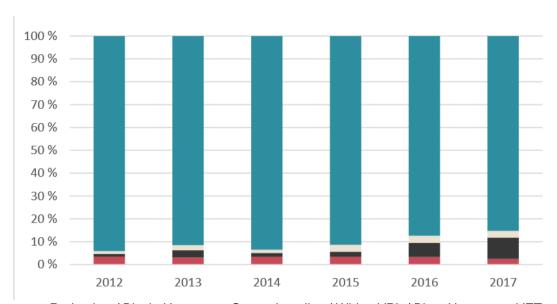
https://www.kompetansenorge.no/contentassets/3b9b61b65e5148e6966b98909f667f0f/opptak_fagskolese ktor_veiledning1.pdf

¹³ https://www.regjeringen.no/contentassets/a77423656189422e885cb4d8140626d2/fagskoler-2017.pdf

¹⁴ https://www.kompetansenorge.no/statistikk-og-analyse/publikasjoner/Realkompetansevurdering-ved-opptak-til-fagskoler/

Table 2
Basis for admission to public post-secondary VET. (Technical, maritime, health and social studies)

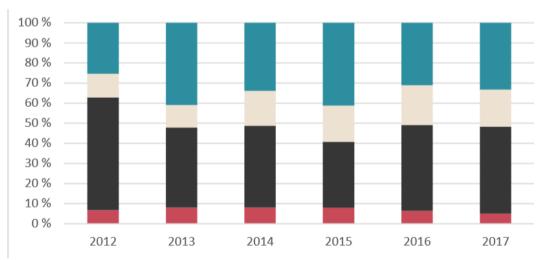
Source: NIFU 2018:10 (chapter 5.2.1)



Red: other / Black: Upper sec. General studies / White: VPL / Blue: Upper sec. VET

Table 3
Basis for admission to private post-secondary VET. (Mainly economics, administration and creative studies)

Source: NIFU 2018:10 (chapter 5.2.1)



Red: other / Black: Upper sec. General studies / White: VPL / Blue: Upper sec. VET

The NIFU report¹⁵ presents three different categories of students admitted on the basis of validation in post-secondary VET:

- Immigrants not yet having had their foreign qualifications approved, and eager to enter the labour market
- Employees wanting or needing to change careers
- People without completed upper secondary education

There are no national statistics for exemptions for parts of programmes on the basis of VPL in post-secondary VET. The vocational colleges are responsible for having procedures in place since 2013.

In **higher education,** VPL was introduced as from 2001. VPL at this level is the responsibility of each institution and is based on institutional procedures and on the learning outcomes of the study programmes concerned. National statistics show that the absolute number of validations for access is quite stable, but given the increase in the total number of students and applicants, the share of VPL applicants is decreasing, as can be seen in table 4 below.

Table 4
Percentage of students seeking admission based on VPL.
Source: NIFU 2018:10 (chapter 6.2.1)



Red: local applicants / Black: applicants via The Norwegian Universities and Colleges Admission Service (NUCAS)

There are no national statistics for exemptions in higher education based on VPL. A survey from Vox (now Skills Norway) reported that VPL for exemptions is not much used¹⁶. NIFU reports in their case studies from two institutions that local practice is time-consuming and driven by a few engaged people, and therefore quite vulnerable¹⁷. As a follow-up of the 2009 White Paper Skills Strategy, Skills Norway

¹⁵ NIFU 2018:10, chapter 5.3

¹⁶ https://www.kompetansenorge.no/statistikk-og-analyse/publikasjoner/Realkompetanse-og-fritak-i-hoyere-utdanning/

¹⁷ NIFU 2018:10, chapter 6.5.1

developed national guidelines for VPL towards exemptions to support local practice, in cooperation with representatives from higher education¹⁸. Based on feed-back from higher education institutions that a more elaborate regulatory framework would help implementation, and following an open consultation, a new regulation including provisions on validation was introduced in 2018, with effect from 1 January 2019.

Validation of prior learning is **publicly funded**. Differences in funding and governance mechanisms found in primary, secondary, post-secondary and higher education affect the preconditions for setting up validation procedures. The sectors of education have therefore developed schemes for VPL according to their specific needs and preconditions.

In primary, lower and upper secondary education, the local education authorities get block grants for education that are expected to cover the costs of VPL arrangements for adults with statutory rights. Adults without the statutory rights to validation, for instance people that have already completed an education at this level, can also get VPL, but they would have to cover their own costs. They may also be referred to VPL from the Norwegian Labour and Welfare Service (NAV). In this case, NAV will cover the costs.

In public post-secondary VET and higher education, VPL is financed by the institutions performing the validation, as responsibilities are devolved to each institution. Especially for post-secondary VET, there are numerous private institutions. In practice, VPL here is financed by students' fees.

1.3 Description of mechanisms in place for identification, documentation, assessment and certification

National regulations and guidelines establish the principles for local provision of validation in the municipalities, in the counties and in the post-secondary and higher education institutions.

In **primary and lower secondary education**, validation is relatively new (introduced by regulation in 2009), and the target group is limited. Norwegian pupils will get a diploma from lower secondary level even though they may not have achieved passing grades in all subjects. Due to the statutory right they are entitled to enter upper secondary education and training. As a consequence of this, the main target group for validation at primary and lower secondary education is immigrants. The general procedures for VPL are described in the guidelines from the Norwegian Directorate for Education and Training, but there is little evidence on local practice.

In **upper secondary education and training**, VPL procedures follow the set-up described in the national guidelines from the Norwegian Directorate for Education and Training.

The *identification phase* is supported by local education administration or career guidance services that will inform and guide the candidate to conclude on what further steps to take; whether VPL is relevant for the candidate and, if so, choose the relevant subjects and curricula as standards for the next phases in the VPL procedure. Public career centres may be involved in this phase. In a VPL candidate survey presented in the NIFU report (NIFU 2018:10), 61 percent of the respondents

state that they are very satisfied or satisfied with the support received in this phase of VPL¹⁹.

In the documentation phase the candidate collects documentation from prior learning in the labour market, voluntary sector or education/training and will be supported by administrative or guidance staff if available locally. Public career centres may also be involved in this phase. In the VPL candidate survey mentioned above, 68 percent of the respondents state that they are very satisfied of satisfied with the support received in this phase of VPL.

In one of the case studies presented in the NIFU report (NIFU 2018:11), some informants from professional VPL staff stated that the quality of documentation from candidates is sometimes quite inadequate. The documentation from employers is often very brief, without descriptions of the candidates' work tasks and acquired competences. It may also be difficult for the candidates to document experience from other learning arenas in ways that express competence which is relevant for the learning outcomes in the curriculum. Some pointed out the challenges connected with immigrants' documentation from work experience in their home country, which could be difficult to match with requirements in the Norwegian curricula²⁰.

Assessors who are experienced in assessing learning outcomes in the relevant curricula lead the *assessment phase*. They are recruited and trained as VPL assessors by the education administration in the county. The assessors plan each assessment procedure based on the documentation provided from the candidate, and the assessment methods chosen are meant to reveal all prior learning of the candidate that is relevant for the curriculum in question. Chosen methods might be dialogue, case-based tasks, practical testing or other. In one of the case studies presented in the NIFU report (NIFU 2018:11), some informants from professional VPL staff have commented on language problems for immigrants, as the assessment has to be conducted in Norwegian and some immigrants may have problems with expressing their competences adequately²¹. In these cases, practical testing (called *vocational testing*) may be the preferred method. However, the same report also points out challenges in using vocational testing, linked to mistrust from employers and unclear signals from national authorities about the use and effect of vocational testing²².

The *certification phase* is performed by the education administration in the county. They produce a formal document (certificate of competence; *kompetansebevis*) describing which learning outcomes in the curriculum that are approved. This document has the same formal standing as a final certificate, but does not have the same content, as it approves only part of the curriculum. The approval through VPL is not described in grades, only as 'approved'.

The national guidelines from the Directorate for Education and Training describe in further detail how to perform VPL locally.

In **post-secondary vocational education and training and in higher education**, VPL is performed somewhat differently depending on the purpose of VPL, whether it is for access or for exemptions, and depending on the field, discipline or vocational sector concerned. However, the four stages of identification, documentation, assessment, and certification are generally adhered to.

¹⁹ NIFU 2018:10, chapter 4.3.7

²⁰ NIFU 2018:11, chapter 2.2.4 and 3.2.4

²¹ NIFU 2018:11, chapter 2.2.5

²² NIFU 2018:11, chapter 4.2.5

Since each institution is autonomous, VPL for access or exemption is provided based on the learning outcomes of the relevant study programme, and there are no general procedures for validation. However, the guidelines from Skills Norway regarding access to post-secondary vocational college education and regarding exemption from parts of programmes in higher education provide some common ground for practice at these levels.

VPL for access

Candidates without formal access certification (i.e. completed upper secondary education), may apply for access based on validation of prior learning. Each institution decides on their own requirements for access.

In post-secondary vocational education and training, the use of VPL for access varies greatly dependent on what kind of subjects the different institutions offer. Some institutions have many VPL applicants, other have none because of strict formal requirements for applicants in the respective trade or profession. The assessment of validation applicatons for access at this level will be done in relation to the admission requirements recognised by NOKUT as part of the accreditation of the programme concerned.

Concerning access to higher education, information on validation possibilities and procedures is provided by the Norwegian Universities and Colleges Admission Service (NUCAS). NUCAS coordinates admission to ordinary undergraduate study programmes at all state, and most private higher education institutions in Norway. NUCAS also registers and administers VPL applications by distributing them to the relevant institutions for local validation procedures. After a revision of the information on validation on its home page in 2016, NUCAS reports that a higher share of validation applications are forwarded for in-depth assessment. In some higher education institutions, VPL applicants must have five years of work practice and sufficient competence in English and Norwegian to be eligible.

In the *identification phase*, the candidate decides whether it is relevant to apply for access based on prior learning. The candidates considering applying for higher education will as a rule find the requested information at the NUCAS home page (elegibility and procedure) and be directed from there to the relevant higher education institution. Candidates considering vocational college education may find useful information (on websites) or they may contact the relevant institution that they want to access to get information and guidance on how to proceed.

In the *documentation phase*, the candidate must collect relevant documentation to prove the required competence for this application. The candidate may get some support from the institution or from NUCAS²³. In one of the case studies presented in the NIFU report, a post-secondary vocational institution reports that some students need a lot of support to deliver a full VPL application with sufficient documentation²⁴.

In the assessment phase, the institution assesses the application from the candidate. Normally, this assessment is performed by administrative staff, based on established requirements, such as documentation of practice and documents to prove language competence at a certain level.

The *certification phase* will result in a document stating that the applicant has gone through a VPL process, and whether he/she has sufficient competence to be

²³NUCAS http://www.samordnaopptak.no/info/english/

²⁴ NIFU 2018:11, chapter 5.4

accepted as a student. When there is competition for a limited number of study places, a candidate may be approved as competent for access without being admitted to the programme applied for.

VPL for exemptions

VPL for exemptions in post-secondary vocational education and higher education is used to shorten study programmes for students with relevant prior learning. Each institution performs VPL against the learning outcomes in their institution-specific study programmes.

In the *documentation phase*, the candidate must collect relevant documentation to prove the required competence for exemption from specific learning outcomes. The candidate may get some support from the relevant department in the institution. The application is handled locally, by the relevant department. In one of the case studies presented in the NIFU report (NIFU 2018:11), one of the institutions reported that it is challenging to prove meta-reflection and understanding of processes through documentation from work experience. In this institution, they had many students seeking VPL for exemptions, but very few were approved²⁵. In another case in the same report, the study programme had VPL for exemptions implemented in the first study semester. All students collected documentation of prior learning as a basis for exemptions and individual education plans²⁶.

In the assessment phase, administrative staff performs the assessment in cooperation with academic or teaching staff. The objective is to prove that the candidate meets the required standards described in learning outcomes in the relevant subject or study programme. Different methods of assessment may be used, such as assessment of portfolio, case-based tasks, dialogue and interviews, presentations, simulations or other. In one of the case studies presented in the NIFU report (NIFU 2018:11), assessment of written documentation (portfolio) was used most often. In another case, interviews were standard, as an addition to written documentation²⁷.

If exemption is granted, the *certification phase* will result in a document from the institution, proving exemption from the relevant subject in the study programme, with the required formalities linked to this formal documentation of competence. On the diploma, the results will be stated as 'approved' and not given grades; however, the same number of credits will be awarded as for students who have taken the relevant unit or module in the traditional formal way.

There are no available national statistics on validation for exemptions in post-secondary vocational education and training and in higher education. VPL for exemption is implemented locally in each institution, and registration of results is also handled locally. However, courses that are obtained through validation will always be marked in the diploma of the graduates concerned. Reports from surveys²⁸ (Skills Norway and NIFU) indicate that VPL for exemption is rarely used at these levels.

²⁵ NIFU 2018:11, chapter 6.1.3

²⁶ NIFU 2018:11, chapter 7.2.1. In higher education, all students have an individual education plan, used eg. to follow up on progress and retention.

²⁷ Ibid

²⁸ https://www.kompetansenorge.no/statistikk-og-analyse/publikasjoner/Realkompetanse-og-fritak-i-hoyere-utdanning/

1.4 Description of sectoral/area coverage of VPL arrangements

As mentioned above, VPL in Norway is integrated in the formal education system, including VET.

In working life and third sector / voluntary sector, the focus has been to increase awareness of learning outcomes from these sectors by documenting acquired competences, both to prove that these are major learning arenas and to make this kind of competences subject for VPL.

1.5 Open Educational Resources and mobility

Given that data collection on VPL nationally is focused on numbers, not on content or origin of learning or learning arenas, it is not known whether, or to which extent, learning from Open Educational Resources, such as MOOCs, is a component in validation processes. Since validation is based on all kinds of prior learning irrespective of the learning arena, outcomes of learning from OERs would be accepted as part of the candidate's total learning.

If the providers of OERs, including MOOCs, are higher education institutions, and the courses are part of the providing institutions' own degree programmes, the assessment would be considered as recognition of formal qualifications, not as VPL.

In principle, there is no difference between OERs/MOOCs and other provision. As long as it is clear whether the course is (part of) a formal programme and designed in a way that allows verifiable identification of both course provider and course participants, it is equal to other provision as to the value of the qualification. This view is also voiced in a green paper on MOOCs submitted to the Minister of Education and Research in June 2014 (NOU 2014:5).

2. Results of validation

2.1 Identification of qualifications obtained through validation

The Norwegian validation system is firmly placed in the formal education sector. Hence, the standards for validation of learning from the workplace or third sector are the learning outcomes described in national and/or institutional curricula and study programmes in formal educationand training.

As a consequence of this, the certification issued from validation has the same validity as other documentation from formal education.

VPL most often leads to partial qualifications. However, in primary and lower secondary education and in general studies at upper secondary level, the candidate may get a full qualification and be ready for admission to upper secondary education or higher education, respectively.

In **primary and lower secondary education** VPL may be used by immigrants as a stepping stone to upper secondary education. However, in one of the case studies presented in the NIFU report (NIFU 2018:11), professionals involved in VPL suggest further analysis of the purpose of VPL at this level as they find the process to be too complex for this target group²⁹.

²⁹ NIFU 2018:11, chapter 4.2.2

In **upper secondary education,** including VET, partial qualifications may be documented in a certificate of competence (*kompetansebevis*). These certificates are awarded to recognise that an individual has achieved certain sets of objectives (learning outcomes), either full or partial subjects, within an upper secondary curriculum. The certificate of competence does not entitle the holder to a full certificate of upper secondary education and training – gaps in knowledge / competences must be addressed before a full certificate can be obtained. To obtain a full certificate in VET; a trade or journeyman's certificate, the candidate has to undergo the same final exam as all other students.

The certificate of competence can serve as stand-alone evidence of competences and can be used for example to support a job application. It can also be used to inform the learner's participation in further education courses, in order to embark on a learning trajectory ending with a full certificate of formal education.

In **post-secondary vocational education and training** and in **higher education**, VPL is most often used for access/admission and will, as such, not lead to specific documentation apart from a document stating the result. The objective of the process is to be admitted as a student.

In principle, documentation from VPL for exemptions has the same status as other documentation provided by the institutions regarding student results. The vocational colleges and higher education institutions are not requested to report on validation for exemption, however, and there is hence no national statistics on this type of validation.

As validation in Norway is closely linked to learning outcomes from formal education and training, a certificate or diploma from formal education may contain subjects or modules approved through VPL. These certificates and diplomas have the same standing as certificates without VPL notifications. However, as VPL does not result in grades, only 'approved', the use of a certificate including VPL may be a disadvantage for the graduate in applications for further education, in cases where grading is used for access based on competition. This challenge was discussed in one of the case studies presented in the NIFU report. Informants among professional staff working with VPL highlighted the importance of adequate guidance in the introductory phase in VPL, to prevent that the lack of grades becomes a problem for the candidates later on³⁰.

2.2 Link between VPL in Norway and formal qualifications

Outcomes of validation of prior learning in Norway are formally recognised as equal to other formal documentation of learning since certification of VPL is issued from the same institutions as certificates and diplomas acquired through formal learning.

The Norwegian Qualifications Framework for Lifelong Learning (NQF) includes all levels of formal qualifications in Norway. As VPL is based on learning outcomes from formal education only, VPL serves as a link between prior learning from work and voluntary sector and the NQF; through VPL candidates can obtain formal proof of their competence, which in turn can be part of a qualification placed at a certain level in the NQF.

It is worth noting that candidates who apply for enrolment in a higher-level programme, e.g. a master's programme, can access the programme based on VPL, but this does not mean they get a bachelor's degree in the process. Their access is

³⁰ NIFU 2018:11, chapter 2.2.2

based on their prior learning assessed and found to be at the required level for the master programme.

2.3 Mechanisms of VPL in formal education; access and exemptions

In upper secondary education, including VET, adults without formal qualifications may get VPL for exemption. This means that they may shorten their study period by doing only the necessary additional education and training to be able to enter exams at this level. VPL alone may result in stand-alone documentation, but this is not valid as a full qualification at this level for VET. To get a full qualification in VET, one is required to pass the final trade or journeyman's exam.

In post-secondary vocational education and training and in higher education, VPL is most often used as an alternative entry process for those who do not have the formal entrance certification from upper secondary education. VPL for exemptions from parts of study programmes is also a legal right, but as this is not reported in national statistics, local practice is unknown.

Exemptions can also be granted in the transition between post-secondary VET and bachelor programmes in university colleges. Because of differences between programmes within the same field both in post-secondary vocational, and higher education, the outcomes of such assessments vary between institutions. Developmental workhas been initiated as a follow-up of the 2016 *Skilled Workers for the Future* White Paper, including looking at a system for transition between these levels of education.

3. Coherence of validation arrangements with other transparency and recognition tools

3.1 VPL, NQF and EQF

This section seeks to investigate the coherence of validation arrangements with the Norwegian Qualifications Framework for Lifelong Learning (*Nasjonalt kvalifikasjonsrammeverk for livslang læring*, NKR)³¹ and with the European Qualifications Framework (EQF). NOKUT is the national coordination point for the EQF.

The legal backdrop of the development of the NKR is the inclusion of the 2008 EQF recommendation into the EEA agreement.

The NKR was developed over time, in a complex process including all sectors of education and training, and a wide range of stakeholders. A qualifications framework for higher education was adopted in 2009, as a follow-up of the Bologna process. In 2011, the Ministry of Education and Research laid down the full NKR, comprising primary, lower secondary, both general and vocational upper secondary, post-secondary and higher education qualifications spread over seven levels (see Fig. 1). The three top levels (6, 7, 8) are in line with thefirst, second, and third cycle of the framework of the European Higher Education Area.

³¹ https://www.nokut.no/siteassets/nkr/20140606 norwegian qualifications framework.pdf

In the NKR, there is one common set of descriptors for each level, divided into knowledge (*kunnskap*), skills (*ferdigheter*) and competences (*generell kompetanse*). The exception is level 4, the upper secondary level, with two sets of descriptors of equal value; one for vocational and one for academic/generalqualifications. After a gradual development in the different sectors, the Norwegian education and training system is now fully learning outcomes-based.

The report referencing the NKR to the EQF was presented to the EQF Advisory Group in 2014 by the Ministry of Education and Research. The self-certification of the levels linked to the Bologna process (QF-EHEA) was included in the report.

The referencing of the NKR to the EQF, facilitates comparison of qualifications across borders. In November 2017, the Ministry of Education and Research laid down a regulation on NKR, including level descriptors, levelling of qualifications and referencing to the EQF. (Forskrift om Nasjonalt kvalifikasjonsrammeverk for livslang læring og om henvisningen til Det europeiske kvalifikasjonsrammeverket for livslang læring)³²

The NKR is considered as a tool for transparency rather than a tool for reform. The intention is to describe the formal qualifications of the education system rather than change them, and use these descriptions to promote lifelong learning and support flexibility in the learners' options. Opening up for the development of new instruments for valuing learning from other arenas is one of the objectives of the NKR.

Since the validation system in Norway is closely linked to the formal system and solely carried out against the standards there, coherence between validation arrangements and the NKR is very strong. VPL can take place at any level of the framework. The NKR outlines five areas in which it will influence validation:

- introduction of learning outcomes as the general principle for all qualifications;
- increased transparency of qualification levels;
- development of more fit-for-purpose methods, supporting validation;
- more consistent terminology and language (conceptual basis);
- general shift of attention towards learning outcomes³³.

As of today, the influence of the NKR on validation has not been subject to evaluation.

Several groups of stakeholders voiced criticism against the NKR during the development and approval phase, notably because it did not include any kind of qualification from other learning arenas than the formal education system. Partly in response to this, a committee ("Utvalg om kompetanser utenfor det formelle utdanningssystemet") was established in 2013 to investigate possibilities for including non-formal learning in the NKR. However, it proved difficult to reach an agreement on recommendations, so the 2015 final report of the committee described two possible models for further development³⁴.

3.2 VPL, Europass and Youthpass

The Europass Diploma Supplement (DS) is automatically issued free of charge, in English, to all higher education graduates in Norway, along with their diploma. The intention of the DS is to facilitate for mobility and transparency by describing the

³² https://lovdata.no/dokument/SF/forskrift/2017-11-08-1846/%C2%A71#KAPITTEL 4

³³ NKR, p. 32

³⁴ A presentation in English of these models is found on page 17 in "How informal and non-formal learning is recognised in Europe. Norway – country report". www.bertelsmann-stiftung.de/vnfil-in-europe.

qualification, the results obtained, and the learning outcomes of the graduate. The Diploma Supplement is issued by each higher education institution and follows the agreed format of the Council of Europe, UNESCO, and the European Commission, and in the EHEA. It does not replace the actual diploma and does not guarantee approval by other institutions.

The 2017 NKR regulation explicitly states that a reference to the corresponding EQF level should be made in supplementing documents like the Europass Certificate Supplement and Diploma Supplement, not in the diploma or certificate itself.

The Europass Certificate Supplement is used in upper secondary VET, to supplement the formal trade or journeyman's certificate. A survey conducted on the use of the Europass Certificate Supplement (ECS) in 2016³⁵ concluded that in Norway, the ECS is used when organising studies/training etc. abroad, but also, almost just as frequently, when applying for jobs within the country. The ECS is primarily used by pupils and apprentices, but also by teachers and administrative school staff. The total results of the survey at European level confirm that the ECS is used more frequently to apply for jobs or studies within the candidates' home country than outside.

Youthpass is an instrument intended to document the learning experience and outcomes of the projects of the Erasmus+ Youth in Action programme (*Erasmus* + *Aktiv Ungdom* in Norwegian). The national agency for Erasmus + Youth in Action lies with the Directorate for Children, Youth and Family Affairs. They report on best practices, but due to limited resources, there is no broad monitoring on the use of Youthpass in Norway. The impression is that Youthpass is used mostly when applying for jobs.

Since validation in Norway is strictly linked to the formal education system, supplementing documents like the Youthpass will naturally factor in the identification and documentation stage but will not carry any kind of guarantee as to results. The standards for validation are the curricula and study programmes of the educational institutions in each sector, and it will be up to the assessor to consider which parts of the prior learning of the candidate are relevant. Normally, formal education and training, as described in the Diploma and Certificate Supplements, is not subject to validation. However, validation may be relevant in some cases where formal prior learning from another level or sector of education may be considered relevant. Also, courses and modules that have been recognised as part of a higher education study programme on the basis of validation will appear on the Diploma Supplement, as they do on the diploma. The principle for assessing is to look for "equal" rather than "identical" knowledge, skills and competences, so in these cases any kind of documentation may be considered in the process.

3.3 VPL, ECTS and ECVET

Norway is part of the European Higher Education Area, and a reform of higher education, called the Quality Reform, was initiated in 2001, and implemented in 2003. New grading and credit systems following the ECTS were introduced, as well as new degrees (bachelor, master, ph.d.), to align the higher education system with those of other European countries, in accordance with the Bologna process. The old degree system was phased out by 2007.

NOKUT is responsible for general recognition of higher education from other countries, and the higher education institutions recognise higher education from abroad for the purposes of further study, or as equivalent to their own qualifications (useful in certain fields like engineering, where labour market regulations of qualification requirements are indirect). These processes, however, are not considered part of the validation system, as they seek to recognise formal qualifications rather than competences acquired through informal and non-formal learning.

Validation in higher education is the responsibility of each autonomous higher education institution, assessing the prior learning of the candidates against the learning outcomes and requirements of the institution's own study programmes. In validation processes, focusing on prior learning in a broader sense, from a wider range of learning arenas, and not on formal background alone is encouraged. A validation process in higher education may result in granting the candidate an exemption corresponding to a certain number of credits, "studiepoeng", which correspond to ECTS credits.

As to ECVET, there is no national decision on the implementation of ECVET as of yet. Possible implementation of ECVET was assessed in a public consultation in 2015, involving major stakeholders such as the social partners. The conclusion outlined several possible strands of action, but no measures have been initiated.

ECVET is used in Norway only as a project tool for cross-border mobility in VET. No ECVET credits /study points are granted. When Norwegian pupils and apprentices in VET go abroad, they get a contract drawing up the subject content and evaluation. For pupils, this learning is included as part of their practical subjects when they come back; for apprentices, the learning from abroad is included as a module in their learning pathway.

NOKUT is responsible for formal recognition of VET certificates from other countries. This process does not include validation. Validation in upper secondary VET is normally based on work experience and non-formal and informal learning. ECVET points from abroad may come into play as one of many factors in the candidate's background, if he/she does not have a full, foreign certificate.

It should be emphasised that in principle, the focus in validation is on the candidate's total prior learning as a whole. Credits as proof of a learning experience may be taken into account when identifying and validating the candidate's total learning. If pupils/students have a full foreign diploma or certificate, or credits from partial studies, this can be recognised in a general, formal recognition process by NOKUT, or by the higher education institutions, as described above.

4. Support to individuals

4.1 Guidance and counselling

In the Norwegian processes for validation, the four stages in the VPL process have been implemented at all levels of education and training: Information and guidance; identification and documentation; assessment; certification – as described in section 1.3. These stages are specified in the guidelines for lower and upper secondary education, as well as in the guidelines for post-secondary VET (admission) and higher education (exemption).

For validation at upper secondary level, the guidance stage starts when the applicant contacts the county administration, or when he/she contacts or is referred to the regional career guidance centre. Through guidance, the purpose of validation and possible further learning pathways are clarified. This first stage also displays the breadth of the applicant's informal, non-formal and formal learning. The guidelines from the Norwegian Directorate for Education and Training emphasise the importance of guidance in the validation process.

The NIFU case study report (NIFU 2018:11) states that the career centres in the counties play an active role in information and guidance linked to VPL in upper secondary education³⁶.

For validation in post-secondary and higher education, the provision of guidance will vary according to priorities in each institution. Again, the guidelines mentioned previously strongly recommend early intervention in the form of candidate-centred guidance.

In 2015, a survey on guidance in validation in the Nordic countries, including Norway, was conducted by the Nordic Network for Adult Learning (*Nordiskt nätverk för vuxnas lärande, NVL*)³⁷. The report outlines five main challenges as areas for development:

- clarification of aims and contents of guidance in VPL
- funding
- professional development for staff
- coordination of activities in the different phases
- information and dissemination on VPL

4.2 Special measures targeted at disadvantaged groups

The Norwegian VPL system is open to all and not especially targeted at any groups. However, there are project-based initiatives targeted at vulnerable groups such as refugees, inmates and youth outside of employment or education. For inmates, VPL is now available in all prisons in Norway³⁸. However, the extent to which validation is offered, varies across prisons.

At present, Skills Norway is coordinating VISKA (Visible Skills of Adults) ³⁹, an Erasmus + policy experimentation project aiming at providing VPL to vulnerable groups in the partner countries. In the Norwegian trials of the VISKA project, the use of interpreters in the assessment phase and extensive use of practical testing will be tried out, to make it possible for immigrants to obtain VPL at an earlier stage, possibly leading to faster integration in Norwegian working life or further education.

The Norwegian Labour and Welfare Service (NAV) can refer clients to the regional education authorities and fund their validation process, in order to support transition into education and training leading to employment.

In the case studies presented in the NIFU report (NIFU 2018:11), informants from professional VPL staff were concerned that information about the VPL system, available on numerous websites from the public sector and targeted at the whole

³⁶ NIFU 2018:11, chapter 2.3

³⁷ Full report (NVL, 2015) <u>Guidance in validation within the Nordic region</u>

³⁸ Cedefop case study https://cumulus.cedefop.europa.eu/files/vetelib/2011/77485.pdf

³⁹ www.viskaproject.eu

population, was difficult to understand for immigrants without Norwegian language skills and with limited knowledge of the Norwegian education system⁴⁰.

4.3 Skills audit

A skills audit or general mapping of competences is not specified in legislation. However, the law governing the Norwegian Labour and Welfare Service (NAV) states that people who want or need support to get into employment, have a right to have their situation clarified. There is no time limit, but cases should be processed without delay. NAV and the regional career guidance centres can contribute to this clarification, which can be linked to a mapping of competences or skills audit.

In the Norwegian validation system, however, a general skills audit is not incorporated in the validation procedure, as VPL is very closely linked to learning outcomes in the curriculum. In validation, identification and assessment of competences will be concentrated on relevance for the criteria and standards in the specific situation, according to the purposes and goals of the candidate. (For example, items from the VET curriculum or a higher education module.)

4.4 Affordability and accessibility

Being so strongly linked to the formal education system, the Norwegian validation system is governed by the same legislation as the education system. For example: If you have a right to education and training under the adult learning legislation, you also have a right to validation in the same sector of school/education. The law on higher education also includes provisions on validation in this sector.

According to the sector in question, this legislation may affect accessibility to validation, but otherwise, the system is quite open. Since public education is free in Norway, it follows that validation is normally free also. There may be small local variations, but this is the governing principle.

However, it has been discussed whether it may be a challenge that VPL at higher level (i.e. in post-secondary vocational education and higher education) is available only for students in the institutions. Those who might need to validate their prior learning against learning outcomes at higher level without being a student, have no access to such VPL in Norway today. An example is presented in the report from NIFU (NIFU 2018:10), where informants from the social partners state that employees who have formal education at upper secondary or higher level and have further developed their competence during many years in the workplace, might need to formalise their work-place learning due to redundancies or changed requirements in their line of business⁴¹. They have no access to VPL today without applying for admission as a student. That said, there is ample opportunity to receive guidance and support when applying for enrolment based on VPL, and it is free.

⁴⁰ NIFU 2018:11, chapter 2.3

⁴¹ NIFU 2018:10, chapter 7.3

5. Role of stakeholders

5.1 Involvement of stakeholder groups.

In 2011, Vox (now Skills Norway) published a report on the status of VPL in Norway. The report was written in close cooperation with all stakeholders. Since then there has been no systematic networking among all national stakeholders exclusively on VPL. However, Skills Norway has involved relevant stakeholders in sectoral activities, such as in the development of guidelines for post-secondary vocational education and training and higher education, and in analysis activities. For the VISKA project, national stakeholders in education, labour and welfare and immigrant integration authorities are participating in a national advisory group.

The **social partners** have an important role in contributing to the dialogue between the labour market and the education sector to promote the development of an education system in line with labour market needs. They participate in formalised networks in VET, in post-secondary vocational education and higher education. They were also important partners in the development of the Norwegian Strategy for Skills Policy 2017–2021⁴², in which the importance of validation of prior learning is highlighted as part of the priority area «Promote learning in the workplace and effective use of skills». Linked to the strategy, a project led by four of the social partners has developed a method for describing qualifications based on trade specific needs in the retail trade⁴³. The report suggests further development of this work at national level.

The social partners are concerned about creating closer links between non-formal learning in working life, and the NQF and formal education. The final report by the committee referred to in section 3.1 – «Innplassering av kvalifikasjoner fra ikkeformell opplæring i Nasjonalt kvalifikasjonsrammeverk"⁴⁴ – presents two different strategies; either using the formal system and continuing to develop learning outcomes compatible with requirements in formal education and training, as VPL does today, or setting up systems for qualifications in working life based on trade specific learning outcomes.

In the **voluntary sector / third sector** the discussion centres on how to define key competences from these learning arenas and how they can be validated. Some actors from the sector claim that these kinds of competences, acquired through participation in third sector, are not recognised in the formal education system and that there is a need to describe national standards to make it possible to validate these competences as well.

National, regional and local education authorities are important stakeholders with their respective roles and responsibilities in VPL, as described in previous chapters.

National, regional and local immigrant integration and labour and welfare authorities have their respective roles in including VPL services in their schemes for supporting candidates in their target groups. The Ministry of Education and Research, The Directorate of Integration and Diversity (IMDi) and The Directorate

http://www.kompetansenorge.no/contentassets/06b4044721e849ed8116604f9af4faa5/norwegian_strategy_for_skills.pdf

https://www.regjeringen.no/contentassets/8e5673bb11ea4cbab9c9eae12664702c/kvalifikasjonsrammeverksrapport_org_lav.pdf

¹²

⁴³ The project report (in Norwegian) https://www.virke.no/globalassets/balansekunst.pdf

of Labour and Welfare include VPL in their policy development. Local integration reception centres and NAV offices promote and include VPL services in their schemes for their candidates, to support integration into education or working life.

5.2 Coordination between stakeholders

As mentioned previously, the Norwegian Directorate for Education and Training bears the overall national responsibility for supervision of primary, lower secondary and upper secondary education and training, including VET. This includes validation of formal, non-formal and informal learning at these levels of education. In this context, the Directorate works with and is in regular contact with the Ministry. The Directorate also liaises regularly with County Governors – a government agency in the counties responsible for a number of supervision and management duties; with county education authorities – in charge of the operation and development of upper secondary education and training at county level; and with other stakeholders such as the social partners, Skills Norway, the Norwegian Association for Adult Learning (NAAL; in Norwegian: *VOFO*) and NAV.

Skills Norway and the Ministry of Education and Research are in regular contact in different areas of responsibility held by Skills Norway. Skills Norway will provide policy notes to the Ministry on challenges that might need to be addressed.

In terms of other stakeholders, there is no permanent reference group in place. Normally, Skills Norway or other relevant stakeholders would set up a reference group to support specific projects relating to validation (e.g. reference groups were set up to support the development of the aforementioned guidelines, and currently, a reference group is supporting the VISKA project). The Skills Norway website provides a range of information on validation, which is of use for stakeholders.

NAV and the county education authorities have county agreements to ensure targeted cooperation both at county level (planning) and practical collaboration at local level. These agreements draw up cooperation around addressing low-skilled workers / unemployed people in need of assistance to increase their job opportunities and/or complete training.

In the case studies presented in the NIFU report (NIFU 2018:11), respondents working with VPL for immigrants at primary, lower and upper secondary level have asked for better coordination between national, regional and local stakeholders to contribute both to better information about VPL and also to higher quality in the process⁴⁵.

5.3 Role of employers, youth organisations and civil society organisations

In the third sector and the labour market, one ongoing challenge is to disseminate the available validation arrangements, while making sure that stakeholders find them useful and provide feedback to public validation services. In this way, validation procedures can sustain current skills strategies.

NVL produced a report in 2015 discussing key competences in the voluntary sector and how they can be validated⁴⁶. This report contains suggestions of relevance for validation in the third sector in Norway.

⁴⁵ NIFU 2018:11, chapter 4.4

⁴⁶ http://nvl.org/Content/Folkbildning-key-competences-and-validation

One of the case studies presented in the NIFU report (NIFU 2018:11) states that some employers know about the system of VPL and support the use of it for competence development. However, they are probably few and there is a potential for employers to play an active role in informing about VPL, both for internal purposes and externally, as part of their recruitment process⁴⁷.

The case study also mentions another aspect of employers' role in VPL. It reports that some employers may not consider a certificate of competence based on VPL as equal to a certificate of competence obtained through regular education and training in the school system⁴⁸. This may indicate that there is a need for better dialogue between employers and VPL providers to engage employers as VPL ambassadors.

It is worth noting that the Basic Agreement between the Confederation of Norwegian Business and Industry (NHO) and the Norwegian Confederation of Trade Unions (LO) confirms the importance of making prior learning visible. Virke, the Enterprise Federation of Norway, has this in their Agreement with the LO as well. Also, the Norwegian Strategy for Skills Policy 2017–2021 emphasises the importance of validation.

6. Capacity building and quality assurance

6.1 Provision for development of staff

At present, there are no centralised requirements or regulations for the qualifications of staff involved in VPL. Training of staff is the responsibility of the relevant providing institution or education administration; meaning each municipality/county (lower and upper secondary education) / each educational institution (post-secondary VET and higher education) is responsible for training staff involved in validation. The assessment of this training is handled according to quality assurance systems already implemented in each provision or sector.

In lower and upper secondary education, seminars and conferences for assessors are delivered regionally or nationally. Assessors are often recruited on the background of their professional subject expertise, and informally instructed as to what validation is about and which principles apply. Some mentoring might be provided. There will be differences between regions. In higher education and post-secondary VET, information on training is lacking, but it is likely that institutions offer some form of training, for example peer learning / informal training from colleagues.

The existing guidelines provide practical information on the delivery of validation, highlighting the four phases and which input is necessary in each of them. Especially at upper secondary level, the guidelines are actively used. In one of the case studies presented in the NIFU report (NIFU 2018:11), respondents pointed out that new routines suggested in the guidelines from the Norwegian Directorate for Education and Training had resulted in an increase in time and resources spent on VPL locally⁴⁹.

In terms of development, Oslo Metropolitan University is currently providing formal courses at higher education level for assessors in VPL in upper secondary

⁴⁷ NIFU 2018:11, chapter 2.3

⁴⁸ NIFU 2018:11, chapter 3.2.2

⁴⁹ NIFU 2018:11, chapter 3.2.3

education, in cooperation with the Norwegian Directorate for Education and Training. This is work in progress, which will be evaluated with a view to further development.

6.2 Provisions for development of infrastructure and awarding bodies

Since the validation system is closely connected to the formal education system and the legislation governing adults' rights to education and training, any development of validation infrastructure will have to comply with its current position within this system. Likewise, the awarding bodies are the same as for formal education and training and the awarded diplomas and certificates are equal to those of students having followed a traditional learning pathway.

By mandate from the Ministry of Education and Research, the two agencies with responsibilities for validation – Skills Norway and the Norwegian Directorate for Education and Training – also initiate and carry out projects aiming at developing and strengthening the validation system; often in cooperation with other stakeholders at regional, national or international level.

6.3 Quality assurance mechanisms

Being closely linked to the formal education system, VPL is subject to the quality assurance procedures as implemented in each education sector. Currently, there is no specific QA framework for validation.

In lower and upper secondary education and training, municipalities and counties, respectively, are responsible for quality assurance of the education as well as of validation, whereas the national responsibility for quality at these levels lies with the Norwegian Directorate for Education and Training. The learning outcomes in national curricula are used as standards (reference) for validation. There is a balance between standardisation – the same standards and QA systems apply for the whole country, as linked to the formal education system – and a certain leeway for local and regional solutions. For example, the counties can decide on the requirements they set out for validation practitioners. It is expected that over time, the guidelines launched in 2014⁵⁰ will help encourage a more equal approach regionally. The municipalities and counties are subject to regular state inspections, which are to take account of the provision of validation as well as formal education.

In post-secondary VET and higher education, each institution has a high degree of autonomy. They are responsible for ensuring that the study programmes they offer are of high quality, assured through internal systems for quality assurance. As the accrediting institution for these sectors of education, NOKUT is responsible for supervising the institutions' systematic work on assuring and enhancing the quality of the education. It is up to the individual institution to ensure the quality of their validation services. The case study report produced by NIFU (NIFU 2018:11) points out that systems based on a few entrepreneurial and engaged people are vulnerable⁵¹.

Similarly to the above-mentioned guidelines for secondary education and training, the guidelines developed by Vox (now Skills Norway) to support the admissions

⁵⁰ https://www.udir.no/globalassets/filer/regelverk/tolkningsuttalelser/udir_retningslinjer-for-realkompetansevurd_web.pdf

https://www.udir.no/contentassets/2d44dd1eca5f4449a314a4c541ae75e2/retningslinjer_realkomp_vgo.pdf

⁵¹ NIFU 2018:11, chapter 7.4

process in post-secondary VET⁵² and the use of validation to grant exemptions in higher education institutions⁵³ are intended help encourage a more standardised approach, thus supporting transparency and quality.

7. Evaluation and monitoring

As validation is implemented in the education system, internal evaluation and monitoring of VPL is included in general systems for evaluation and monitoring established at each level of education. These systems are also linked to internal quality assurance measures mentioned above. Each provider receives input on quality issues through these internal routines for quality assurance and will also get feedback on candidate satisfaction through possible complaints from candidates on the result of the process. All candidates have a legal right to complain about decisions made by public services.

National statistics on VPL are available at all levels of education, although there are challenges as outlined below in chapter 8. In primary, lower and upper secondary education, the Norwegian Directorate for Education and Training collects data on the number of VPL candidates from municipalities and counties. In post-secondary VET and higher education, the Norwegian Centre for Research Data (NSD) collects data from the institutions in the databases DBH-F and DBH, respectively. Skills Norway compiles and publishes the most essential statistics concerning adult education and training, including VPL, in the Skills Norway Statistics Bank.

The Directorate for Education and Training and NOKUT initiate inspections in their respective target areas. The County Governors may target their inspection at secondary adult education and VPL procedures as they are delivered by local providers. NOKUT supervises accreditations and recognitions in Norwegian higher education and tertiary vocational education. The supervision covers study programmes, tertiary vocational education, the institutions' quality assurance practices and institutional accreditation. They do not go into detail on how VPL is delivered in practice.

There is no regular monitoring of impact of VPL. Some qualitative surveys and case studies have been produced by Skills Norway⁵⁴. A project report from 2011⁵⁵ on the status of validation, published by Vox (now Skills Norway), identified a need to improve cooperation and involvement in different sectors at county level, and between different levels of education. Quality assurance was also identified as important; both in terms of methods and with regard to the training of assessors.

The European Inventory on validation of non-formal and informal learning regularly monitors the development of VPL in Europe. The Norwegian country report presents input from all relevant stakeholders, including NAV and the third sector.

In 2018, the comprehensive study on the status of VPL in Norway (NIFU 2018:10 and NIFU 2018:11) was published.

https://www.kompetansenorge.no/contentassets/3b9b61b65e5148e6966b98909f667f0f/opptak_fagskolesektor_veiledning1.pdf

 $\frac{https://www.kompetansenorge.no/contentassets/5f2020b0d0ab41bdb5dabe9eab0bfdd4/fritak_uhsektoren_veiledning2.pdf}{}$

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⁵⁴ http://www.kompetansenorge.no/statistikk-og-analyse/statistikk-og-analyse-om-realkompetanse/

⁵⁵ https://www.kompetansenorge.no/statistikk-og-analyse/publikasjoner/Realkompetansevurdering--status-og-utfordringer-2011/

8. Challenges and possibilities

This chapter is based on the previous work of Skills Norway and other evidence, and on the recently published NIFU reports⁵⁶. The NIFU reports include a broad analysis of existing literature, encompassing Skills Norway / Vox studies and other national and international research.

8.1 Criteria for success

The NIFU report (NIFU 2018:10) includes a discussion of how success can be defined. Practice and aims of VPL vary across sectors, but a consideration common to all would be that VPL is successful when it actually reaches people who are realistic candidates to have their competence validated. The survey has disclosed some critical factors that need to be in place:

- Information must be easily available, and adapted to a range of target groups. There should also be a good flow of information between the various actors involved.
- Clear, transparent and efficient processes are called for.
- Quality assurance of the process is crucial. More people should be involved, and routines must be transparent to ensure quality. The candidates' right to submit complaints must be observed.
- VPL must be firmly anchored in the providing institution. Practice and knowledge should be shared and spread in the institution.

The comprehensive Norwegian system for VPL is based on legislation and common principles and can be said to function well in many respects. However, although awareness of the success criteria is high, they are not always fully satisfied, and implementation varies across regions, sectors and institutions.

8.2 Remaining challenges

Although the Norwegian VPL system has a firm foundation in legislation and at policy level, as shown in previous chapters, and has developed in a positive direction over the years, challenges remain. A crucial factor in a successful VPL system is trust; that the system has legitimacy across all levels of the education sector as well as in the labour market. In certain areas of education, non-formal and informal learning may not be seen as equally valuable as formal learning. Also, mistrust can spring from a lack of knowledge about validation, or lack of clarity and coherence in routines and processes, as detailed below. In the labour market, mistrust may be at the root of a perceived lack of interest in and acceptance of validation – for similar reasons. The substantial regional variations in practice may also serve to undermine trust in the VPL system.

To further identify challenges and obstacles, they will be discussed under three headings; information, practice and statistics.

Information

To improve access to VPL and awareness and knowledge about the possibilities and limitations of the system, information is of major importance. Although a substantial amount of information can be found online, it still takes a lot of sifting through to find the right information. In addition, most of it is in Norwegian only

⁵⁶ NIFU 2018:10, NIFU 2018:11

and is not easily accessible for newly arrived migrants, a relevant target group for VPL.

At primary and lower secondary level of the education system, there is little awareness and little available information about VPL, whereas for upper secondary, the counties' websites provide updated information on VPL. At higher levels, most institutions have information about VPL possibilities on their websites.

In public services, awareness and knowledge of VPL varies considerably among different kinds of staff; often it is dependent on individuals and not well anchored in the organisations. Consequently, information about VPL may not be communicated to potential users as well as one should expect from public service providers.

In working life, stakeholders at national level are well informed, whereas awareness may be lower on the ground.

Practice

To ensure a high-quality system that provides equal services to all candidates, challenges in the existing practice need to be addressed. At all levels of education, frontline staff report that the work required for the documentation phase is time-consuming and extensive, and that the documentation process can be both difficult and very demanding for the VPL candidates. The submitted documentation is often found lacking, either due to misunderstanding from the candidates' side or to lack of clarity in the information provided. There is a need to work along two strands – one to improve and support the documentation process for the candidates; another to create transparent, efficient and effective procedures for staff supporting the documentation phase. This will link up naturally with user-centred information and guidance processes.

Another challenge frequently mentioned is the uneven provision of training for staff. Different kinds of staff involved in VPL (guidance councillors, assessors, administrative staff) may have different needs, but common to all, in addition to more role-specific training, is a need for networking and exchange with colleagues in similar situations. Staff in different positions could benefit from discussing a broad range of validation-related topics in wider fora, including development of assessment methodology and improvement in routines and procedures. Since the validation environment in each location is often very small, it is also quite vulnerable to loss of competence through changes in the staff.

Statistics

A sound base of statistical evidence is crucial for research and development of the validation system, as well as for governance and policy development. Several studies, most recently the 2018 NIFU report (NIFU 2018:10), point out a great many shortcomings in this area. One major reason for this situation, especially at primary and secondary levels of education, is that the systems for collecting data are inadequate and disconnected.

Statistics at primary and lower secondary education level are far from satisfactory; at upper secondary level slightly better, but still insufficient. Also statistics from post-secondary vocational education and training display shortcomings. For higher education, the situation is considerably better, but only for admission, not for exemption. As to working life, there is no statistical evidence on validation at all.

In sum, information, practice and statistics are areas in VPL in need of improvement across all levels of education. Deficiencies in the VPL system may hinder efficiency and effectiveness; deter potential candidates and frustrate staff; and weaken trust in the system both within education and in working life.

8.3 Future developments

In order to facilitate for better use of existing VPL possibilities and for system development and improvement, it is vital to plan and initiate measures aimed at meeting the challenges mentioned above. In this section, some concrete measures will be discussed; proceeding to ideas that may inspire new thinking around the VPL system in the last part of the section. In line with national strategies, relevant stakeholders, notably the social partners, would be crucial contributors in such developmental work.

Better information and more knowledge, improved practice and a better statistical evidence base would improve the VPL system and, in turn, contribute to increased trust in VPL across sectors.

Information

To meet the challenges outlined in the section above, there are several flows of information to consider. Clearly, information directed at potential VPL candidates needs to be improved and adapted to a wider range of target groups, especially non-Norwegian groups, at all levels of education.

For working life, measures must be taken to inform and raise awareness about VPL among relevant employers and industries. Employers, from their side, need to work on improving the procedures for documenting experience and competence for their workers. This may be useful both for internal competence development and for later use in possible VPL processes. In general, there is little available evidence on VPL in working life, so gathering data and information would be another strand of work to consider.

In public services, cooperation across sectors needs to be strengthened, for instance between regional education authorities and NAV. Improving the flow of information would facilitate for better and more efficient procedures in the services, and for exchanging and sharing experience and knowledge.

Practice

Many of the challenges mentioned above are linked to the success criteria about good processes and strong staff environments. One clear improvement to consider would be strengthening support for staff in the form of better, more robust and updated ICT systems for better data flow and clearer descriptions of procedure for staff as well as for candidates. For candidates, an increased emphasis on practical performance ('show, not tell') would promote validation of competences also for non-native speakers and people with lower language skills.

In general, professional development and information measures targeting the different groups of involved staff would contribute to better practice across levels and institutions. In a case study presented in the NIFU report (NIFU 2018:11), respondents (staff) from upper secondary education asked for networking between VPL professionals and for stronger involvement from national actors to support better use of the national guidelines and more similar practice in the different counties⁵⁷. Through strengthened staff environments and networks for shared practice, the dependence on single individuals would be reduced, and VPL would be better anchored in the organisations.

Statistics

In order to support evidence-based decision-making, governance, research and development in the field of VPL, there is a strong need to improve statistics on

⁵⁷ NIFU 2018:11, chapter 3.4 and 3.5

validation, as mentioned in section 8.2. One essential measure to achieve such improvement would be to provide good, centrally developed systems and tools for consistent and more detailed registration of data and ensuing reporting on the data.

Incentives could be introduced to encourage registration of data in general, and to make sure certain areas are covered, e.g. reporting on exemptions in higher education.

Other possibilities

In addition to the three areas above, it could be worth looking into other possibilities for system development. It should be noted that the ideas below are included only to outline possibilities also for more extensive changes to the system, and that no decisions have been made about proceeding in any such direction. These ideas would obviously need thorough and broad discussion and investigation by a wide range of stakeholders.

One area to investigate further could be discontinuing VPL for the primary education level in its current form, especially since it is rarely used and is not seen to support adults seeking to pass through education more swiftly. Currently, modularised provision of education for adults at primary level is being piloted in 28 Norwegian municipalities, which will open new opportunities for individualised learning pathways and maybe also for VPL for smaller modules.

Another possibility, which would require thorough investigation and cross-sectoral cooperation, would be centralising VPL - from the current municipal, regional, and higher education providers of validation to one central, independent unit. Given the variations in the education system, a centralised unit would have to work with a large network of competent assessors to be able to provide VPL for all subjects and levels. However, considerable advantages could be envisioned, such as enhanced equity in access and provision, improved quality and user-friendliness, and with the involvement of the social partners; also strengthened links between the education sector and the labour market.

Linked to this, it is also worth considering how to develop the system so as to improve access to VPL in general, at all levels and for all citizens. As mentioned previously, it is not possible in today's system to obtain VPL at higher education level, for example, without applying for enrolment as a student. Extending access to reach more groups of people independently of their connection to the education system would perhaps be more feasible with a centralised set-up.

List of abbreviations

NAV the Norwegian Labour and Welfare Service

NIFU the Nordic Institute for Studies in Innovation, Research and Education

NOKUT the Norwegian Agency for Quality Assurance in Education

NUCAS the Norwegian Universities and Colleges Admission Service (Samordna Opptak)

NVL Nordic Network for Adult Learning (Nordiskt nätverk för vuxnas lärande)

VET Vocational education and training

NAAL National Association for Adult Learning (VOFO)

VPL Validation of prior learning

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