

Addendum to the Danish referencing report from 2011

Inclusion of non-formal qualifications in the Danish NQF

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1. Summary

This addendum contains the documentation and conclusions from the process behind the inclusion of non-formal qualifications in the Danish NQF.

Since 2019, private and public non-formal qualifications can be included in the Danish Qualifications Framework for Lifelong Learning (NQF). The term “non-formal qualifications” refers to private and public qualifications in Denmark that are not regulated by the Danish Ministry of Culture, Ministry of Higher Education and Science or Ministry of Children and Education.

The principles and procedures for the inclusion of non-formal qualifications in the Danish NQF were adopted and implemented by the National Coordination Committee for the NQF. The National Coordination Committee consists of the Danish Accreditation Institution (AI) and representatives from the national agencies responsible for the Danish education systems and quality control (the Danish Ministry of Culture (KUM), the Ministry of Higher Education and Science (UFM) and the Ministry of Children and Education (BUVM)).

In 2013, a mapping of non-formal qualifications in Denmark was conducted in order to determine the potential market for level assessments of non-formal qualifications. It was determined that Denmark has a big market for non-formal qualifications, considering the number of citizens. The mapping of non-formal qualifications provided a useful foundation for the final political approval of setting up a process for including non-formal qualifications in the Danish NQF in 2018.

Due to a high amount of non-formal qualifications in Denmark, the National Coordination Committee for the NQF decided to set up sustainability criteria for the level assessments in order to ensure the sustainability of the non-formal qualifications that could apply for and receive a level assessment. Amongst these (but not limited to) were criteria regarding the amount of times a programme should have been conducted before eligible to apply for an assessment. Next to this, the National Coordination Committee determined criteria regarding the description of the qualification’s purpose and relevance to the labor market and/or the area of culture or leisure, as well as criteria regarding the learning outcomes and how they should be described within the categories of the Danish NQF for Lifelong Learning. In chapter 3.3, the assessment criteria and procedure are described.

The overall political purpose of including non-formal qualifications in the Danish NQF was to strengthen coherence and transparency in the Danish education system and the enhancement of lifelong learning throughout the entire Danish education system. Therefore, stakeholder engagement has been essential in the development and implementation of assessments of non-formal qualifications in Denmark. During the process

of developing the principles and procedures, all relevant stakeholders were invited to give their feedback in an official consultation process with amongst others the social partners, higher educational institutions and trade committees for VET programmes. See chapter 3.2 for an overview of the stakeholders and their main demands.

The AI provides level assessments as a revenue-covered activity and according to the criteria determined by the National Coordination Committee. The AI is a government institution that - besides working with level assessments of non-formal qualifications - is the designated Danish accreditation agency tasked with ensuring the quality of publicly acknowledged and higher education institutions in Denmark. An assessment does not result in formal rights or other formal recognition, including the right to credit transfer. As a result of this, the quality assurance of referencing non-formal qualifications to the NQF must be balanced with a view to securing solid quality assurance mechanisms in line with the quality assurance principles for NQF/EQF qualifications (Annex IV EQF recommendation). At the same time, it should not inflict extensive and burdensome quality assurance procedures in line with the criteria for formal qualification, which could otherwise exclude small legitimate providers from applying for having their qualifications referenced to the NQF. In terms of securing solid and transparent quality assurance principles of referencing non-formal qualifications to the EQF, it is notable that the quality assurance mechanisms underpinning the Council Recommendation on a European Approach to Micro-credentials for Lifelong Learning and Employability adopted in 2022 (years later than the implementation of the Danish scheme for referencing non-formal qualifications to the NQF) are almost identical to the requirements for quality assurance of referencing non-formal qualifications to the Danish NQF.

In 2022, an independent evaluation of the assessment process was carried out by a consultancy in order to evaluate if any improvements or changes to the assessment process were necessary. Following the evaluation, changes to the assessment process and communication initiatives have been implemented by the AI and the National Coordination Committee. The evaluation and results are described in chapter 4.

This addendum is an addition to the Danish referencing report from 2011 that is still valid. Because the inclusion of non-formal qualifications in the Danish NQF is considered a substantial change to the country's education system, it was deemed necessary to develop this addendum as an update. Two international experts with special insights into inclusion of non-formal qualifications have been part of the addendum process to amongst others verify the objectivity and independence of the process and criteria behind the inclusion of non-formal qualifications in the Danish NQF. The reflections from the international experts following the review meeting in September 2023 have been added to chapter 6.

The addendum to the referencing report answers each of the 10 criteria and procedures published by the EQF Advisory Group. For more information on the 10 criteria and how this addendum answers them, see chapter 5.

2. Addendum to the Danish referencing report

This chapter presents the process behind making the addendum to the Danish referencing report.

The [Danish referencing to the European Qualifications Framework \(EQF\)](#) was completed and presented to the EQF Advisory Group in Budapest in 2011. The referencing report establishes a reference between the Danish Qualifications Framework for Lifelong Learning (NQF) and the EQF. The report from 2011 is the official Danish response to the [European Council's 2008 recommendation on the establishment of the EQF](#), where the countries were encouraged to establish a reference between their NQF and the EQF.

The referencing report must be updated when there are substantial changes in a country's education system. Due to the inclusion of non-formal qualifications in the Danish NQF in 2019, it was deemed necessary to develop this addendum as an update to the original Danish referencing report from 2011, which is still valid.

2.1 Development of the addendum

This addendum has been developed by the National Coordination Committee for NQF.

The National Coordination Committee consists of the Danish Accreditation Institution (AI) and representatives from the national agencies responsible for the Danish education systems and quality control (the Danish Ministry of Culture (KUM), the Ministry of Higher Education and Science (UFM) and the Ministry of Children and Education (BUVM)). The AI is responsible for the accreditation of formal qualifications and educational institutions in Denmark. Since 2019, the AI has also been responsible for the level assessments of non-formal qualifications in Denmark.

The National Coordination Committee and two international experts have reviewed the referencing report addendum in the summer and fall of 2023. It was considered unnecessary with an official and public consultation process for this addendum, seeing as the addendum simply summarizes the process, principles and procedures behind the inclusion of non-formal qualifications in the Danish NQF. During the development and implementation phase in 2017, 2018 and 2019, public consultation meetings were held, where all relevant stakeholders were invited. Furthermore, an independent evaluation of the level assessment of non-formal qualifications was conducted in the spring 2022 by

EVA. Following the evaluation, the National Coordination Committee and the AI have incorporated the feedback results into the assessment process and communication strategy. More information on this process is covered in chapter 3 and 4.

Finally, the addendum was presented to the EQF Advisory Group and CEDEFOP in November 2023. Following the feedback from the international experts, EQF AG and CEDEFOP, the addendum was edited and the final version (March 2024) published online during the spring 2024.

2.2 Methods and data

In the work on the referencing report from 2011, the ten reference criteria and procedures adopted by the EQF Advisory Group were central. These have also been central to the work with the addendum. In order to answer the ten reference criteria and procedures, the following information has, amongst others, been used for the development of this addendum:

- Documentation from meetings (meeting notes, agenda and attendee lists) during the development phase has been used to support the description of the inclusion process from 2017 to 2019. The AI has supplied documentation from the meetings.
- For the implementation phase, the official playbook used by the AI when they make their assessments has been used as a source for insights into the day-to-day procedure as well as the formal principles and criteria behind the level assessments of non-formal qualifications.
- The application manual for providers of non-formal qualifications represents the assessment process from the applicant's point of view, together with the [independent report](#) from Danmarks Evalueringsinstitut (EVA) from 2022 (also Deliverable 3.1 in the Danish EQF contract 2021-2023 (Project: 101049263)). The evaluation report from 2022 was based on qualitative interviews and includes the opinion and input from the applicants on the assessment process. As such, it has been deemed not necessary to interview the providers of non-formal qualifications again for the purpose of developing this addendum. However, the international experts that reviewed the referencing report in the fall 2023, were invited to interview two providers as part of their review.
- Finally, the AI has delivered a status with the current statistics on level assessments of non-formal qualifications in Denmark.

3. Inclusion of non-formal qualifications in the Danish NQF

This chapter presents the process behind including non-formal qualifications in the Danish NQF.

3.1 Development and implementation

In the autumn of 2017, work on including non-formal qualifications in the Danish NQF was initiated by the National Coordination Committee. The AI functioned as the leader of the inclusion project, because of their role as the designated quality assurance agency in Denmark, responsible for monitoring and supporting the quality assurance work of higher education institutions through accreditation. The AI works independently from the Danish ministries and is a member of the European Quality Assurance Register for Higher Education (EQAR).

The National Coordination Committee functioned as the AI's reference in the three ministries; UFM, BUVM and KUM. The ministries were responsible for communicating information on the inclusion with their respective sectors. Stakeholders were invited to give feedback in both the development and implementation phase and the inclusion enjoyed great support both from the private and the public sector. More information on the communication and involvement of stakeholders will be covered in chapter 3.2.

With the amendment of the Danish accreditation act ([Bekendtgørelse af Lov om Akkreditering af Videregående Uddannelsesinstitutioner, § 26a](#)) on 2 March 2018, it was formally decided that private and public non-formal qualifications could be included in the Danish Qualifications Framework for Lifelong Learning.

Since 2019, the AI has provided the level assessment as a revenue-covered activity and according to criteria determined by the National Coordination Committee. These criteria include (but are not limited to) guidelines on the description of the qualification's purpose and relevance to the labor market and/or the area of culture or leisure, as well as criteria regarding the learning outcomes and how they should be described within the categories of the Danish NQF for Lifelong Learning. The criteria will be dealt with in chapter 3.3.

Referencing non-formal qualifications to the NQF does not result in formal rights or other formal recognition, including the right to access to the next level in the education system and credit transfer.

By 2022, 3 years after the implementation, an evaluation of the inclusion of non-formal qualifications in the Danish NQF was to be carried out. The evaluation would address the outcomes, possible benefits and shortcomings for the providers of non-formal qualifications that had applied for having their qualifications included in the Danish NQF.

As of June 2023, 67 applications for inclusion from providers of non-formal qualifications have been received, of which 52 have been evaluated and assessed according to the Danish NQF.

3.2 Stakeholders, purpose and scope

The concept for the level assessments as well as the assessment criteria were developed in close cooperation with stakeholders. The stakeholders of the non-formal qualifications could be categorized into four groups: non-publicly recognized educational providers, relevant ministries, public educational institutions and social partners. These groups and their main demands are described below.

The non-publicly recognized educational providers in Denmark were mapped in the 2013 report; *The mapping of qualifications outside of the Danish NQF* (in Danish: *Kortlægning af kvalifikationer udenfor dansk kvalifikationsramme og livslang læring*) by the Technological Institute (see Appendix A) upon request of the National Coordination Committee. The Committee initiated the study in 2013 in order to get insights into the offer of non-formal qualifications in Denmark and their providers. The survey identified which providers that would potentially want a level assessment. This included an estimate of the number of students, length of education, finances and branch distribution.

The overall political purpose of including non-formal qualifications in the Danish NQF was to strengthen coherence and transparency in the Danish education system and the enhancement of lifelong learning throughout the entire Danish education system. In order to do so, it was important to make sure that the inclusion of non-publicly recognized qualifications met the demands of the key stakeholders.

The AI clarified the demands of the stakeholders in the early phase of the inclusion process in 2019 by scoping the demands at informal meetings with representatives from the different stakeholder groups. The scoping of the demands also formed the basis for establishing a relationship with the key stakeholders, which was useful in the further development and clarification of the concept as well as during the implementation of the level assessments of non-formal qualifications.

3.2.1 The Stakeholders and their main demands

Roughly, the stakeholders of the non-formal qualifications could be divided into four groups. Below the stakeholders are listed with the scoped demands briefly summarized:

1. Non-publicly recognized educational providers. The scoping of the providers' demands by the AI in 2017 showed that the providers had two primary wishes; better connection with the public education system including better access to credit transfer for their students, as well as a quality stamp that could be used

in relation to marketing of their qualifications. This group of stakeholders was subcategorized in two subgroups;

- Providers who sold their training on an open market, e.g. lifelong learning study programmes. These stakeholders had a primarily marketing-driven demand.
- Companies/organizations with large scale internal training activities, e.g. the financial sector at the Insurance Academy or Dansk Supermarket. These stakeholders had a primarily context-oriented demand.

The level assessments were to be designed in a way that met the demands for both groups.

2. The relevant ministries. According to the legislative amendment, the criteria for level assessment were to be agreed with the ministries KUM, UFM and BUVM. Creating an attractive system around lifelong learning has been a political focus point as well as the creation of a more coherent education system, where achieved learning outcomes are not duplicated by easier credit transfer and acknowledgement of prior learning. Finally, it was also a political wish to create a more transparent way for employers to quickly understand the non-formal qualifications of their employees. Thus, it was central that proposals for implementation took the demands of the respective ministries and possible concerns into account.
3. Public educational institutions. Because it was part of the purpose that the level assessments should contribute to a more coherent education system for the inclusion to be successful, the public educational institutions would have to see the assessments as a useful tool for possible credit transfers. It was therefore important that the concrete concept for level assessment included the demands for e.g. expertise and information that the educational institutions had.
4. Social partners. The social partners, such as the Danish Trade Union Confederation (Fagbevægelsens Hovedorganisation (FH)), the Council for Vocational Training (Rådet for de Grundlæggende Erhvervsrettede Uddannelser (REU)), the Council for Adult and Continuing Education (Rådet for Voksen- og Efteruddannelse (VEU) and the Confederation of Danish Industry (Dansk Industri (DI)), represent parties involved with the labor market policy from a national, regional and local level, through counselling and tripartite discussions with the government. The partners' large influence on employment policy, wages and labor conditions are characteristic of the Danish labor market model. For the social partners, lifelong learning is essential and some of their main interests were to enforce lifelong learning opportunities and create a more transparent way for employers to quickly understand the non-formal qualifications of their employees.

Next to the above listed demands under each stakeholder group, group 1 (the non-publicly recognized educational providers) also had a demand that was essential in the development of the concept behind the level assessments: keeping the cost of a level assessment to a minimum. Historically, Denmark has a long tradition of non-formal micro-credentials that enjoy approval in the working field. As such there are many providers of

all sizes that provide different types of qualifications. Some of the smaller providers would not be able to afford a level assessment if the costs were too high. In order to make the level assessments fair and accessible to all types of providers, one of the main criteria was to keep the price as low as possible.

Referencing non-formal qualifications to the NQF does not provide public recognition of the qualifications. It does not include formal rights or legal entitlement to admission or automatic credit transfer at publicly recognized educational qualifications. Seeing as there are no formal rights connected to a level assessment, the costs of the assessment also had to reflect this. If no providers would apply for a level assessment of their non-formal qualifications, there would be no reason to include non-formal qualifications in the Danish NQF.

The AI provides the assessments as a revenue-covered activity. In order to keep the costs low, especially the time used by the AI, a high amount of automatization and digitalization was the goal. As such, it was also decided not to include physical visits at the educational provider's property in the assessment process. Rather, focus was put on assessing written material with, amongst others, the learning outcome descriptions.

3.2.2 Stakeholder communication and formal reviews

Because the inclusion of non-formal qualifications in the Danish NQF was new, communication was essential in order to spread the knowledge on the benefits of the NQF and create stakeholder engagement. As such, it was necessary to send out information to all stakeholders with updates on the development of the inclusion and later mails with reminders after the implementation. The inclusion of non-formal qualifications in the Danish NQF would only be considered successful when it had been proven useful and valuable by the market and public education providers. Therefore, stakeholder engagement has played a key role in the AI's approach to this project.

Next to the informal stakeholder meetings in the initial phase, a formal consultation meeting was organized in April 2019. At the formal consultation meeting on the 8th of April 2019, a proposal for requirements and concept for level assessment of non-formal qualifications was presented and all interested parties had the opportunity to share their opinions and ideas. All stakeholders with interest in the concept were invited and approximately 80 people attended, both representatives from public higher education institutions, the social partners as well as representatives from providers of non-formal qualifications such as a film school, a school for coaching and psychotherapy, a real estate union and an academy for insurances. See the list of attending organizations in the public consultation process in Appendix B.

Next to the public consultation meeting, an invitation for written consultation was sent to the Council for Vocational Training (Rådet for de Grundlæggende Erhvervsrettede Uddannelser (REU)), the Council for Adult and Continuing Education (Rådet for Voksen- og Efteruddannelse (VEU) and the trade committees for VET programmes (de faglige udvalg).

Based on the public consultation meeting and written feedback, the final concept for level assessment was adjusted and approved accordingly by the relevant ministries.

3.3 The assessment procedures step by step

When a provider of education applies for level assessment of a qualification they apply for an education's overall objectives for learning outcome to be classified on a specific level in the Danish NQF. The applicant declares which NQF level they wish to be assessed according to. The AI supported by one or more professional experts, makes an overall assessment of whether the level assessment applied for matches the corresponding level in the Danish NQF. All providers of private or public education and training that is not acknowledged by ministerial regulation, can apply for level assessment from the AI. The assessment procedure is split in two phases.

3.3.1 Phase 1

In phase 1, the AI performs an administrative assessment of whether the qualification fulfills the six requirements necessary in order to qualify for a level assessment:

1. The purpose of the qualification: There should be clear description of the qualification's purpose and relevance to the labor market and/or the area of culture or leisure. The qualification cannot be denominational or politically based.
2. Learning outcomes: There should be a description of the qualification's overall objectives for intended learning outcome, described within the categories of the Danish NQF for Lifelong Learning: knowledge, skills and competencies. If the qualification contains sub elements, their learning outcomes should also be described.
3. Sustainability of the qualification: a) The educational programme should have been conducted from start to finish at least five times and offered for at least five years, or b) For shorter programmes, they should have been conducted at least 30 times. These criteria are meant to ensure the sustainability of the qualifications that apply for level assessment and to rule out short-lived pop-up qualifications for which there is no long-term demand.
4. Teaching evaluation: There should be a description of how the provider of the non-formal qualification conducts teaching evaluation. In the evaluation, the students must as a minimum be asked about the learning outcome and the teaching method.
5. Assessment: There should be an assessment of whether the student has reached the overall objectives for intended learning outcome by the completion of the programme.
6. Issuing of certificate: The provider must issue a certificate to the student at the completion of the qualification. The certificate should as a minimum contain information on the learning outcomes, the qualification's level in the Danish NQF and the study load (the total amount of credits or teaching hours that as minimum should take place).

If the qualification fulfills the requirements, the application proceeds to phase 2. If the programme does not fulfill the requirements, the AI can choose to reject the assessment. In this case, the provider will only have to pay for phase 1. For more information on considerations behind the price, see chapter 3.3.5 and 4.4.

3.3.2 Phase 2

In phase 2, the AI, complimented by one or more professional experts, makes a professional assessment of whether the qualification's overall objectives for intended learning outcome can be reference to the applied NQF level.

The AI recruits either one or more professional experts for each case depending on the qualification's content and purpose. The expert will support the AI in the assessment of whether the teachers have the necessary qualifications on a level that provides the students with the opportunity to reach the learning outcomes for the applied NQF level. The expert will also be involved in the assessment of the qualification's overall goal for learning outcome if an elaboration of the specific academic elements of the learning outcomes is necessary. Therefore, it is important that the expert have an in-depth knowledge of the qualification's subject field and content. The expert must also be adequately impartial in regards to assess the qualification. The expert must have no personal or financial interest in the outcome of the level assessment. If the subject field of the programme is narrow making it difficult to choose experts which are impartial, experts from other countries can be selected.

The AI appoints the expert; however, the applicant is welcome to contribute to identifying possible expert profiles. The recruited expert is submitted for consultation at the applicant to ensure the relevance and impartiality of the expert. Through the consultation, the applicant is able to point to any conditions that might affect the experts' impartiality in the specific case.

Together with the expert, the AI assesses the following criteria:

1. Learning outcome: the AI and the professional expert(s) compare the qualification's overall objectives for intended learning outcome described as knowledge, skills and competencies with the learning outcomes in the NQF. They assess whether the level of the qualification's overall objectives for intended learning outcome correlates with the level applied for and if there is a connection between the overall learning outcomes and the purpose of the qualification.
2. The teachers' academic qualifications: the AI and the professional expert(s) assess whether the teachers have the academic qualifications that makes it possible for the students to reach the qualification's overall objectives for intended learning outcome at the applied level.
3. Teaching evaluation: the AI assesses whether the way the provider conducts and uses teaching evaluations supports the students in reaching the qualification's overall objectives for intended learning outcomes.

At this point, the result of the level assessment is shared with the provider. The provider is then able to correct any factual errors in the reasoned assessment at the consultation.

Whether the qualification's overall objectives for learning outcome can be referenced to the level applied for is determined through the 'best fit' term. 'Best fit' means that the qualification's overall objectives for learning outcome are compared to the level on which the description of the overall objectives for learning outcome are most in accordance with the description of the level in the NQF. This is done based on an overall assessment. Therefore, in order for a programme to be assessed according to a specific

level, it is not necessary for the programme to match all knowledge, skills and competencies assessed to be on the applied level in the Danish NQF for Lifelong Learning. This means, that if a qualification e.g. has a knowledge level that stretches through level 3 and 4, a skill level that stretches through level 4 and 5 and a competencies level that is on level 4, then the learning outcomes of the qualification is best fitted on level 4.

For more details on the application and assessment procedure, see [the application manual on the AI's website](#) (available both in Danish and English).

3.3.3 Quality assurance of referencing non-formal qualifications to the Danish NQF

Throughout the whole process of constructing a Danish scheme for referencing non-formal qualifications to the Danish NQF, the issue of solid quality assurance mechanisms has been at the core of the process.

In order to safeguard the trust in the Danish NQF and qualifications system it has been vital to develop quality assurance mechanisms which adheres to the quality assurance principles for NQF/EQF qualifications (Annex IV EQF recommendation).

At the same time, it must be kept in mind that there are no formal rights attached to the referencing of non-formal qualifications to the NQF. Referencing creates transparency and a solid base for state recognized educational institutions' decisions on admission and credit transfer as well as employers' understanding of an applicant's full qualifications portfolio, but admission and credit transfer do not come as a right. For that reason, it has been important not to impose the same very extensive quality assurance principles and procedures as legislation imposes on the state recognised educational institutions.

Furthermore, the diversity of non-formal providers is massive and many small providers of legitimate non-formal qualifications do not have the administrative capacity to adhere to the full-scale quality assurance process, which formal institutions are legally bound to undergo.

Solid quality assurance of referencing non-formal qualifications to the NQF are underpinned by several criteria: The criteria of sustainability of the qualification (programmes should have been offered multiple times before applying for levelling) proves the relevance and quality assurance of the offered qualification. There are clear demands of both teaching evaluation as well as a final assessment of the students achieved learning outcomes. The examination of teacher's qualifications through documented CV proves that they are capable of providing education at the level required. The design of learning outcomes is carefully examined to be consistent with the required level of learning outcomes at the levels to which the qualifications are referenced and again underlined by assessments of achieved learning outcomes.

Interestingly, the criteria and principles of quality assurance in the Danish scheme are almost identical to the quality assurance mechanisms underpinning the Council Recommendation on a European Approach to Micro-credentials for Lifelong Learning and

Employability adopted in 2022 - years later than the implementation of the Danish scheme for referencing non-formal qualifications to the NQF.

3.3.4 After the assessment

The expected process time is approx. three months from the application has been received. If the qualification's overall objectives for intended learning outcome is placed on the level applied for, the provider will receive an electronic certificate that proves that the qualification has been level assessed. The certificate states the assessed NQF level that the qualification's overall objectives for learning outcome are compared to. Along with the certificate, the provider will also receive a written assessment of the level assessment, which elaborates on the AI's and the expert's assessment based on the assessment points. Both the electronic certificate and the written assessment is available on the [AI's website](#).

An assessment is valid for four years if the qualification does not undergo major changes. After four years, the provider can apply for renewal of a level assessment. When a qualification has been level assessed, the provider is obligated to inform the AI if the content and/or conditions of the qualification undergo significant changes within the four-year period.

If the assessment is unsuccessful, the provider will receive a letter with the arguments for refusal. The provider is welcome to apply again at a later time and the refusal is not publicly shared or visible online. For more information on the main reasons for refusal, see 4.2.

3.3.5 The price of an assessment

Currently, the overall price for a level assessment is 33,000 DKK excl. VAT (approximately 4400 EUR). The price is paid in two installments. The first installment of 13,000 DKK (approximately 1700 EUR) + VAT covers the expenses associated with assessing whether the qualification meets the requirements in order to be level assessed in phase 1. If the requirements for level assessment in phase 1 are met, the application will proceed to phase 2. If rejected in phase 1, the applicant will not be requested to pay for phase 2. The second installment of 20,000 DKK (approximately 2700 EUR) + VAT covers the expenses of the actual level assessment, which will take place in phase 2, including cost of the fee for the external expert.

4. Evaluation of the inclusion of non-formal qualifications in the Danish NQF

This chapter describes the current status and statistics of the inclusion of non-formal qualifications in the Danish NQF since its implementation in 2011, as well as the official evaluation in 2022 and the following adaptations.

4.1 Current status and statistics

From 2019 and until the development of this report in June 2023, 67 applications have been submitted for assessment. Out of the 67 applications, 52¹ non-formal qualifications have been evaluated and assessed according to the Danish NQF. 2 applications are in the evaluation process at the time of the development of this report and 13 applications have been rejected because they didn't fulfill the criteria.

The 52 level assessments cover the following NQF levels:

NQF Level	Amount of assessed qualifications
4	13
5	19 ²
6	14
7	1

As the overview show, the span of the level assessments goes from NQF level 4 to NQF level 6 (and one on level 7), with a majority on NQF level 5, which is comparable to the level of for an example the Danish short cycle qualification (erhvervsakademiuddannelse) in the higher education system.

¹ 47 level assessments have been published on the AI's website. Multiple assessment reports contain level assessments of two different versions of the same qualification. The total amount of 52 includes the fact that 5 qualifications were first ranked at level 5 and later ranked at level 6. These count double in the statistic, because they have in fact been through two assessments.

² In this overview, the 5 qualifications that were initially assessed according to level 5, but later assessed according to level 6, are not included. Therefore, the total sum in this overview is 47 instead of 52.

The assessed qualifications include (but are not limited to) qualifications in the fields of health (acupuncture, clinical cosmetology, hairdressing and sign language), finance and trade (shipping, finance and insurance), arts (acting, film and clothes design) as well as qualifications in the public sector such as prison guard and qualifications in the military. A complete overview of all assessed qualifications can be found on the [AI's website](#).

4.2 Reflections on the most common reasons for a refusal

As described above, 13 applications have received a refusal because they didn't fulfill the criteria. The most common reason for a refusal is that the teachers lack the necessary academic qualifications that make it possible for the students to reach the qualification's overall objectives for intended learning outcome at the applied level (criteria 2).

After completing the assessment process and being refused a level assessment, most of the applicants have implemented changes to their qualification and/or staff and submitted a revised application. Currently, 11 of the refused qualifications have submitted a new application and received a successful level assessment referenced to the Danish NQF. The 11 applications that were approved after a second submission count as new applications in the abovementioned statistics, because they were submitted as new applications and as such went through a new and independent assessment process.

4.3 Evaluation – results from 2022

According to the previous Danish NCP EQF project agreement, an evaluation of the assessment concept should be conducted no later than 3 years after the commencement of this type of level assessment.

The aim of the evaluation was to explore how the providers of private and public non-formal qualifications have experienced the process and impact of having their qualification(s) assessed and referenced to the Danish NQF.

The National Coordination Committee appointed the Danish Evaluation Institute (in Danish: Danmarks Evalueringsinstitut (EVA)) to carry out the evaluation of the concept and implementation of the inclusion of non-formal qualifications in the Danish NQF. The evaluation had to be conducted by an independent party with expert knowledge in the field. EVA is an independent state institution established under the Ministry of Education in 1999. EVA carries out research and evaluations of amongst others the quality of day care centers, schools and educational programmes on their own initiative as well as on request from ministries, local authorities and educational institutions. EVA is used to prepare evaluations in the field of education and was the secretariat for the work on preparing the qualification framework for higher education in 2003 and lifelong learning in 2005-2008. Therefore, the National Coordination Committee concluded that EVA was the best consultant to carry out the evaluation.

The [evaluation report was written in the spring 2022 by EVA](#) on the basis of qualitative interviews with the applicants that received a level assessment (hereafter: informants).

As of spring 2022, 32 different qualifications had applied for a level assessment. Amongst these, 26 qualifications were qualified to receive a level assessment. EVA approached all applicants for the evaluation. 22 informants decided to participate in the evaluation. The 4 applicants that have not taken part in the evaluation have not explained why – they never replied to EVA's contact, despite trying multiple times.

4.3.1 Results of the evaluation report – positive feedback

- Overall, the informants are positive about the level assessment and are satisfied with the process and the communication with the AI.
- Several experience the level assessments to be a quality stamp of the qualification that can contribute to both internal and external recognition, as well as marketing purposes.
- In general, many informants describe that the level assessment process has had a positive influence on the quality development of their qualification, because they have been required to clarify their choice of words and reflect on their future practice in the application process. One informant describes how the process has created an increased focus on internal evaluation, while another says that they are now more aware of the qualifications of future employees.
- Furthermore, the referencing to the Danish NQF has forced the providers to describe their programmes in learning outcomes within the terms of knowledge, skills and competence, thus making the programmes more compatible for comparison with the formal, state recognized programmes. This contributes to create better conditions for cooperation with other schools as well as improve opportunities for recognition of the students' prior learning skills.

4.3.2 Results of the report – wishes for improvement

- There is a general experience by the informants that the outside world does not know the importance of the level assessment, including the importance of the qualification framework in general. Several informants are demanding clearer communication from ministries and the AI about the qualification framework and the level assessments, so that the providers do not have to explain what it means themselves. This could, for example, be in the form of posters in public spaces or at educational fairs.
- During the application process, several informants express a desire for a clarification of the requirements for the various levels in the Qualifications Framework for Lifelong Learning, so that they are sure that they are applying for an assessment at the right level.
- Some of the informants mention that the assessment is costly and would like for the renewal to be cheaper.

Finally, the informants experience that it is too early to assess the significance for students' access to credit transfer and further education. An evaluation of the effects for the students would thus be relevant at a later point.

4.4 Adaptations after the evaluation

As a result of the evaluation report, the National Coordination Committee have initiated the following changes to the work with level assessments of non-formal qualifications:

More communication: Due to the general experience by the informants that the outside world does not know the importance of the level assessment, the National Coordination Committee has focused on enhancing the communication through the following initiatives:

- Developing and disseminating an [information letter](#) to all state recognized educational institutions in Denmark with information on the level assessments of non-formal qualifications in Denmark, a brief status on how many qualifications have already been assessed and an explanation of the purpose of the assessments as well as possible benefits (transparency, easier credit transfer, less studies, which duplicate learning outcomes already achieved).
- Publishing online communication on the level assessments of non-formal qualifications and the evaluation by EVA (see amongst others the news post on the [AI's website](#), [EVA's website](#) and [UFM's website](#)).

Cheaper renewal of the assessment: Next to the communication, focus has been on the application procedure for the providers that want to apply for a renewal of their already existing assessment. The AI has developed a [procedure](#) that incorporates the results of the evaluation. As such, the renewal of already existing level assessment will be 1/3 less than the price for a level assessment. The AI has focused on finding the balance between a simpler process (because the provider has already submitted a successful application once before and can most likely reuse big parts of the previously submitted information), while still receiving enough information to assess if possible changes has been implemented that will influence the assessment.

5. Criteria for the referencing work

According to the Council's recommendation in 2008, each criterion must be dealt with separately (also see page 27 in the [Danish referencing report from 2011](#)). This chapter deals with each criterion separately and should be read as an addition to page 27 in the Danish referencing report from 2011.

- 1) The responsibilities and/or legal competence of all relevant national bodies involved in the referencing process, including the National Coordination Point, are clearly determined and published by the competent public authorities.
 - For this criterion, there are no changes to the referencing report. The responsible parties are still the Danish Accreditation Institution (AI), the national agencies responsible for the Danish education systems and quality control (the Danish Ministry of Culture (KUM), the Ministry of Higher Education and Science (UFM) and the Ministry of Children and Education (BUVM)), the National Coordination Point and the National Coordination Committee.

- 2) There is a clear and demonstrable link between the qualifications levels in the national qualifications framework or system and the level descriptors of the European Qualifications Framework.
 - For this criterion, there are no changes to the referencing report. The AI provides the level assessments according to the Danish NQF levels that have been referenced to EQF in 2011. For more information, see the Danish referencing report from 2011.

- 3) The national framework or qualifications system and its qualifications are based on the principle and objective of learning outcomes and linked to arrangements for validation of non-formal and informal learning and, where these exist, to credit systems.
 - As explained in detail in chapter 3, the AI provides the level assessment according to criteria determined by the National Coordination Committee. These criteria include, amongst others, a description of the qualification in learning outcomes. Read more on the assessment criteria in chapter 3 and in the application manual on the [AI's website](#).

4) The procedures for inclusion of qualifications in the national qualifications framework or for describing the place of qualifications in the national qualification system are transparent.

- According to the [evaluation report made by EVA](#) in 2022 (see chapter 4), the providers of non-formal qualifications are satisfied with the procedures. AI has made a strong effort to ensure a transparent process. After the evaluation report in 2022, the National Coordination Committee has also initiated some changes to the level assessment process and the communication regarding assessments of non-formal qualifications. These changes should help spread the knowledge of the level assessments of non-formal qualifications and make the purpose and procedure even more transparent to the relevant stakeholders.

5) The national quality assurance system(s) for education and training refer(s) to the national qualifications framework or system and are consistent with the relevant European principles and guidelines.

- The AI provides level assessments of non-formal qualifications according to the Danish NQF levels that have already been referenced to EQF in 2011 and deemed consistent and relevant. AI monitors both the referencing of formal higher education qualifications to the NQF and the non-formal qualifications.

6) The referencing process shall include the stated agreement of the relevant quality assurance bodies.

- We refer to the signed declarations from the referencing report from 2011 as well as the new signed declaration by the current quality assurance body in Appendix C.

7) The referencing process shall involve international experts.

- International experts Anna Kahlson from Sweden and Tijs Pijls from the Netherlands have evaluated the Danish process and shared their reflections under chapter 6 in this addendum. A brief description of their professional profiles:

Anna Kahlson, Senior Advisor/Coordinator NCP EQF at the Swedish National Agency for Higher Vocational Education (Myndigheten för yrkeshögskolan – MYH)

Anna has extensive experience working with lifelong learning, qualifications, VET, adult education, and validation of prior learning. At MYH her main area of responsibility is the National Qualifications Framework and the Swedish National Coordination point for the European Qualifications Framework (EQF). Anna heads several projects at MYH, the most recent one being a 3-year pilot developing a validation pathway within Higher Vocational Education (YH-flex) as well as the NOVA-Nordic Erasmus+ project looking at links between VPL, National Qualifications Frameworks and non-formal learning/qualifications. During part of 2017 and 2018 she served as a committee secretary for the Swedish National Delegation for Validation. From 2012–2016 Anna was employed as a qualifications expert at the European Training Foundation (ETF). Prior to

that she worked as a national coordinator for VPL at MYH. She also has experience of working with VPL at municipal level, mainly working with validation for refugees.

Tijs Pijls, Programme Director NCP NLQF

Tijs Pijls is a Dutch NQF and EQF expert and programme director of the NCP NLQF in the Netherlands. He is an educationalist with extensive experience as a consultant in vocational and non-formal education. He is an expert on lifelong learning, in particular frameworks, learning outcomes, learning pathway independent assessment, micro credentials and validating of informal learning. He has been involved with the NCP since the introduction of the NLQF in the Netherlands in 2011. First in the role of advisor, later as programme director. As expert and presenter involved in several projects, PLA's en working groups.

8) The competent national body or bodies shall certify the referencing of the national framework or system with the EQF. One comprehensive report, setting out the referencing and the evidence supporting it shall be published by the competent national bodies, including the National Coordination Point, and shall address separately each of the criteria.

- The referencing report is still valid and this minor addendum deals with each criterion alone, like the referencing report did. The addendum to the Danish referencing report will be published on the relevant website and disseminated to stakeholders.

9) The official EQF platform shall maintain a public listing of member states that have confirmed that they have completed the referencing process, including links to completed referencing reports.

<https://europa.eu/europass/en/eqf-referencing-reports>

10) Following the referencing process, and in line with the timelines set in the Recommendation, all new qualification certificates, diplomas and Europass documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level.

- When a non-formal qualification receives a level assessment, the provider will receive an electronic certificate that proves that the qualification has been level assessed. The certificate states which level on the National Qualifications Framework the qualification's overall objectives for learning outcome is placed on. Along with the certificate, the provider will also receive a written level assessment, that elaborates on the AI's and the expert's assessment based on the assessment points. See Appendix D for an example of a diploma from one of the assessed non-formal qualifications.

6. Reflections from the international experts

The following input from the two experts Anna Kahlson and Tijs Pijls was added to the addendum after the meeting on 26 September:

To begin with, we would like to express that the addendum to the Danish referencing report is well-written and clearly outlines the principles, and procedures for including so-called non-formal qualifications in the Danish qualifications framework. An external evaluation of the system for inclusion has been conducted, which is also addressed in the addendum, providing further information on how the system has been implemented and is functioning so far. The addendum also clearly demonstrates the connection to EQF's 10 referencing criteria. To provide the international experts with additional perspectives and input, a meeting was held with the Danish Accreditation Agency (AI), responsible for the level assessment of non-formal qualifications wishing to be linked to the framework. The international experts also had the opportunity to meet with two organisations that have had non-formal qualifications level assessed. These meetings allowed the experts to ask questions and gain a deeper understanding of how the system is designed and intended to function.

Based on desk research and the conducted information meetings, we (the international experts) can conclude that the 10 referencing criteria are met. We would like to express that it is valuable for additional countries, in this case Denmark, to open up their national qualifications framework to encompass also non-formal qualifications. This contributes to the EQF better reaching its overall objectives, beyond creating better opportunities for lifelong learning in Denmark. An open and inclusive framework will also contribute to enhanced skills provision and better matching between demand and the availability of skills in the Danish labour market.

All countries have their own unique starting points and conditions when developing and implementing a national qualifications framework, including Denmark. This is reflected in how they have chosen to design the process for including non-formal qualifications, and the experts have identified some areas that need to be highlighted and possibly the focus for further development of the Danish NQF.

1. The level assessment for non-formal qualifications consists of two phases. In the first phase, much emphasis is placed on the applicant organisation as an education/training provider rather than on the qualification to be level assessed. An example is the focus on quality and qualifications of the teachers and curricula.

While these aspects of course are important for the quality of education and training they might not be the key quality aspects in relation to qualifications. How does this relate to the principles of the EQF – qualifications that are based on clear learning outcomes that are learning pathway independent? Our advice would be to focus less on input factors (training and education) and more on output: learning outcomes; learning pathway neutral assessment of learners/candidates; and how learners clearly can demonstrate that they have achieved the intended learning outcomes regardless of the how. This is important to also enhance the possibilities of validation of non-formal and informal learning.

2. Another issue is to enhance the value and visibility for non-formal qualifications for both the qualification provider and for end-users. There are currently 67 non-formal qualifications that have applied for level assessment of which 52 with a positive outcome. The result of the level assessment is communicated through an electronic certificate that the provider will receive that proves that the educational programme has been level assessed. This certificate is also published on the Danish Accreditation Agency's website. When the level assessment is no longer valid the electronic certificate is removed from the website. This means, for example, that there is not any way for someone who wants to know more about an issued qualification to find that information after the four years the level assessment is valid.

There is not yet a comprehensive register or database to inform about all qualifications levelled to the framework. We recommend setting up a public register or database, also considering the importance of marketing and communication and the relationship with Europass. One of the strong points for the level assessment of the non-formal qualifications is that not only the level is made visible on the certificate (both the electronic certificate for the level assessment and the certificate issued to successful learners) but also the relative size of the qualification (in study load hours/credits). While this is important for both comparability and portability, the non-formal qualification providers can use ECTS to do this. It might be important to consider if this can create confusion in terms of what the non-formal qualification is "worth" and what an individual holder can do with the non-formal qualification.

3. The choice has been made that only qualifications linked with education/training programmes that have already been in use can apply for level assessment. This is good on the one hand, there is proven quality and stability in regard to provision. How does this relate to the focus on intended learning outcomes and what does this mean for accessibility in the NQF for smaller and entrepreneurial organisations that want to respond quickly with customised programmes (qualification delivering skills important in an ever faster moving labour market? Continued development of the level assessment of non-formal qualifications to the Danish qualifications framework should consider how qualifications that are "new" or perhaps unproven could be level assessed.

Anna Kahlson
Tijs Pijls

Appendix A

Referenced documents

Publications and documents

- The Danish referencing report from 2011 (in English): *Referencing the Danish Qualifications Framework for Lifelong Learning to the European Qualifications Framework* https://ufm.dk/en/education/recognition-and-transparency/transparency-tools/qualifications-frameworks/european-qualifications-framework/national_report_referencing_dk_qualifications_framework_to_eqf.pdf
- Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning: <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A32008H0506%2801%29>
- Evaluation report of the level assessments of non-formal qualifications by the Danish Evaluation Institute from 2022 (in Danish) <https://www.eva.dk/vide-regaaende-uddannelse/evaluering-niveauvurdering-indplacering-private-af-fentlige>
- Report on the mapping of qualifications outside of the Danish NQF (in Danish: *Kortlægning af kvalifikationer udenfor dansk kvalifikationsramme og livslang læring*) by the Technological Institute from 2013
- Application manual for level assessments from the Danish Accreditation Institution (in English): <https://akkr.dk/wp-content/filer/akkr/Guide-to-level-assessment-5.-Edition-1.pdf>
- An overview of all non-formal qualifications that have received a level assessment from AI: <https://akkr.dk/ovrige-vurderinger/niveauvurdering-af-private-uddannelser-m-fl/#1680509638451-5c478ed0-023b>
- Information on the assessment of non-formal qualifications on the website of the Danish Ministry of Higher Education and Science: <https://ufm.dk/uddannelse/ankendelse-og-dokumentation/dokumentation/kvalifikationsrammer/diverse-nyheder/evaluering-af-niveauvurdering-2022>
- News of the evaluation report on AI's website (in Danish): <https://akkr.dk/nyheder/2022/udbytte-af-niveauvurderingskoncept-i-fokus-for-evaluering/>

- Letter to publicly recognized educational institutions in Denmark with information on the level assessments of non-formal qualifications (in Danish): <https://ufm.dk/uddannelse/anerkendelse-og-dokumentation/dokumentation/kvalifikationsrammer/diverse-nyheder/private-uddannelser-indplaceres-i-kvalifikationsrammen-for-livslang-laering-brev-24-04-2023.pdf>
- New application manual on AI's website for providers that wish to renew their already existing assessment (in Danish): <https://akkr.dk/nyheder/2022/opdateret-vejledning-til-niveauvurdering-klar-til-naeste-an-sogningsrunde/>

Ministerial orders

- [Bekendtgørelse af Lov om Akkreditering af Videregående Uddannelsesinstitutioner, § 26a](#) (LBK nr 173 af 02/03/2018 Historisk)

Web pages

- Danish Accreditation Institution: www.akkr.dk
- Danish Ministry of Children and Education: www.uvm.dk
- Danish Ministry of Culture: www.kum.dk
- Danish Ministry of Higher Education and Science: www.ufm.dk
- Danmarks Evalueringsinstitut (EVA): <https://www.eva.dk/>
- EUR-Lex: <https://eur-lex.europa.eu/homepage.html>
- Retsinformationen (online access to the Danish law): <https://www.retsinformation.dk/>

Appendix B

Participants in the inclusion process of non-formal qualifications

National Coordination Committee

- Educational Consultant Kelvin Strømsholt, The Ministry of Children and Education
- Special Adviser Charlotte Romlund Hansen, The Ministry of Children and Education
- Head of Section Rebecca Thorengaard, The Ministry of Culture
- Special Adviser Emilie Dupont Skovgaard, The Danish Accreditation Institution
- Head of Section Malene Hyldekrog, The Danish Accreditation Institution
- Senior Adviser Henrik Pedersen, The Danish Accreditation Institution
- Senior Adviser Allan Bruun Pedersen, The Danish Agency for Higher Education and Science
- Special Adviser Camilla Badse, The Danish Agency for Higher Education and Science
- Head of Section Rikke Gade Gammelgaard, The Danish Agency for Higher Education and Science

National Coordination Point

- Senior Adviser Allan Bruun Pedersen, The Danish Agency for Higher Education and Science

Consultation Process

- 4greenArchitecture
- At Work A/S
- Byggeriets Uddannelser
- Copenhagen Business School
- Center for Offentlig Kompetenceudvikling (COK)
- CfL
- CISPA-Cph.International School of Performing Arts
- Coach & Psykoterapeut Skolen
- Danseuddannelsen.dk by Sara Gaardbo
- Dansk Ejendomsmæglerforening
- Dansk Folkeoplysnings Samråd
- Dansk Psykoterapeutforening
- Danske Erhvervsskoler og -Gymnasier
- Danske Professionshøjskoler
- De Danske Sprogcentre
- Det Faglige Udvalg for Kontoruddannelser
- Det Faglige Udvalg for Detailhandelsuddannelser
- EFT instituttet
- EVU I/S
- Fagligt Udvalg for Uddannelser inden for Oplevelsesområdet
- Fashion Design Akademiet.dk
- Finanssektorens Arbejdsgiverforening

- FOA Fag og Arbejde
- Folkekirkens Kirkemusikskoler/Vestervig
- Folkeuniversitetet
- Fonden Station Next, Filmbyen / Københavns Professionshøjskole m.fl.
- ForandringsAkademiet
- Forsikringsakademiet
- Forsvarsakademiet
- Gymnasieskolernes Lærereforening
- Hcoaching
- Hjemmeværnet (Hjemmeværnsskolen)
- Idrætshøjskolen Sønderborg
- Institut for Relationspsykologi
- Kompetanse Norge
- Kort & Dokumentar Filmskolen
- Kosmetolog Skolen CIDESCO
- Kriminalforsorgens Uddannelsesafdeling
- Kulturministeriet
- Nextjob Gentofte
- Paul Petersens Idrætsinstitut ApS
- Pharmakon – Farmakonomuddannelsen
- Politiskolen
- Praktiserende Akupunktører
- Professionshøjskolen Absalon
- Rudolf Steiner Børnehaveseminariet
- Rumkraft - den elektroniske musikskole
- Rådet for de Grundlæggende Erhvervsrettede Uddannelser (REU)
- Savery Academy Dance & Performance
- Syddansk Universitet
- Segment ApS
- Sjællands Kirkemusikskole
- Skuespillerskolen Ophelia
- STUK, Kontor for voksen og efteruddannelse
- Styrelsen for Forskning og Uddannelse
- Svendborg Scenekunst akademi, Oure
- Teknologisk Institut
- The Commedia School
- Truemax Academy
- Undervisningsministeriet / Internationalt kontor
- UVM - Styrelsen for Undervisning og Kvalitet
- Rådet for Voksen- og Efteruddannelse (VEU)
- Vildtforvaltningsskolen
- Vinuddannelse.dk
- Virtio

Secretariat

- Senior Adviser Allan Bruun Pedersen, The Danish Agency for Higher Education and Science
- Head of Section Rikke Gade Gammelgaard, The Danish Agency for Higher Education and Science

Appendix C

Signed statement

The Danish Accreditation Institution (AI) has been actively involved in the process of including non-formal qualifications in the Danish NQF for Lifelong Learning as a member of the National Coordination Committee and the provider of the level assessments. We agree with the documentation provided in the addendum to the Danish referencing report.

Signature of legal representative of national body:



Anette Dørgé

Executive Director
The Danish Accreditation Institution



The Danish
Accreditation Institution

Place and date: Holbæk / 19.10.2023

Appendix D

Copy of a diploma from an educational provider where the non-formal qualification has received a level assessment by the AI:

