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AONTAS Submission

(The European Commission's register of interest representatives ID number 42963165087-83)

To the Directorate General for Education and Culture, Unit A1 Lifelong learning and 2020 strategy In Response the Consultation on the Promotion and Validation of Non-formal and Informal Learning.

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1. Overview

AONTAS is the National Adult Learning Organisation, a non-government membership organisation established in 1969. The name AONTAS is an acronym in the Irish language; Aos Oideachais Náisiúnta Trí Aontú Saorálach, meaning 'national adult education through voluntary unification'. The word AONTAS itself is also the Irish word for 'unity' or 'union', so the intention of the founders was that AONTAS would be identified by its inclusiveness. We are a registered charity and a company limited by guarantee. We are core-funded by the Department of Education and Skills and we receive project funding from other sources from time to time.

AONTAS as a membership organisation believes in the right of every adult to continue their learning throughout their lives. We believe that adult and community education are key components of the lifelong learning spectrum and are of vital importance to both the individual and to society as a whole. For the individual, lifelong learning provides a means of achieving ones full potential through developing confidence and skills essential for employability, nurturing creativity and imagination, enhancing family relationships and enabling civic participation. For society at large lifelong learning is essential to building a skilled and creative workforce, enabling the creation of wealth, equality and social cohesion and building a healthy democracy.

AONTAS welcomes the opportunity to respond to the consultation on the Promotion and Validation of Non-formal and Informal Learning. With over 40 years experience in the adult learning sector AONTAS wishes to contribute to the consultation by drawing on our experience with adult learners and practitioners in formal and non-formal education whilst being cognisant of national and international policy developments. Given that Ireland has a well developed National Framework of Qualifications our response is in the context of the learning obtained after a process for validating non-formal and informal learning has been implemented. We hope this will inform the consultation and can be used to support countries developing their own National Framework of Qualifications or non-formal/informal learning validation processes.

<u>Profile</u>
- IE- Ireland
- Responding on behalf of an organisation
- Third sector

- Operates at national level
- NGO/volunteer organisation including youth work

2. Importance and value of non-formal/informal learning

2.1 It is important that the knowledge, skills and competences individuals acquire through life and work experience are identified and made visible

The following points are raised in relation to the terms outlines:

1. as part of an individual skills and training needs analysis/ 'bilan de competence'
2. as part of staff appraisal
3. through CVs, and skill and competence passports
4. through certification towards admission to a formal education/training programme
5. through certification towards a formal qualification
6. none of these are necessary, such learning has its own intrinsic value

Strongly agree with 4 and 5

Agree with 1, 2, 3

Disagree with no. 6 – this is dependent on the wishes of the learner

2.1.1 Observations

In addition to the above proposals, learners have expressed to AONTAS that there is a significant outcome from pursuing accredited non-formal learning opportunities including a positive impact on self confidence and feeling a sense of achievement.

The notion that a qualification is 'formal' runs against the concept of validation (including accreditation of non-formal or informal learning). A qualification is neither non-formal nor formal. It is an indicator of the learning outcomes achieved by a learner at a standard agreed level. The Irish national framework of qualifications is an independent entity that can be used to validate the outcomes of all learning. It need not be tied to one area of the education system, as in the case of Ireland, it can be used to validate the learning outcomes of informal, non-formal and formal learning when the relevant quality assurance processes are agreed and the appropriate accreditation procedure is carried out.

Informal, non-formal and formal learning can have both an intrinsic and extrinsic value. The decision to engage in accredited learning is ultimately decided by the learner. In the Irish context non-formal learning can be accredited when an organisation/group completes the quality assurance process. The organisation /group is then quality assured to provide accredited learning. The shift in thinking, from input to learning outcomes focus, allows accreditation of learning in all forms: informal, non-formal and formal. The main benefit of this is that the most appropriate mode of education provision can be decided by the learner and thus is not standardised as there is diversity of provision and choice. This enables the learner to choose the most appropriate and effective learning opportunity for their requirements, thus becoming truly learner centred (this is dependent on the diversity of opportunities available).

Accredited non-formal and informal learning facilitates the individual to have choices, regarding employment or further education. It also bridges the cultural gap to formal education as non-formal and informal settings are proven to be effective for engaging the hard to reach. However, the importance of an effective adult guidance service in providing learners with correct and appropriate information cannot be underestimated. Learners must be informed about the validation process, the kinds of courses that can be accredited, the value of the qualifications available and how it relates to the national framework of qualifications. Learners must be empowered to make informed choices regarding their learning.

Furthermore, a recent research report from AONTAS (2011) highlights the importance of accreditation for non-formal adult education learners. It was noted that it acts as a source of motivation with almost 50% of the learners surveyed saying that they wanted to gain certification every time they took up a course. However, only 10% of non-formal adult education practitioners stated that courses should be accredited every time. Therefore a disconnect exists between what the learners wanted and what practitioners thought was important. Learners need to have a voice within in the non-formal education organisation to ensure that provision meets their needs.

2.2 Learning in non-formal and informal settings is:

1. relevant for people of all ages and skill levels
2. particularly attractive to those with few or no qualifications who may have had negative experiences with formal education/training

3. particularly suited to fostering key competences and 'soft skills', such as entrepreneurship, leadership, team-work and problem solving

4. particularly suited to fostering the acquisition of practical skills

5. particularly suited to promoting personal development, fostering active citizenship and social skills

6. necessary to enable people to keep up to date with new technologies, acquire digital competences and develop skills in emerging growth areas

7. necessary to support social inclusion and combat poverty

Strongly agree with 2, 5, 7

Agree with 1, 3, 4, 6

2.2.1 Observations

All of the questions posed in this section apply to non-formal and informal learning. One could also consider that non-formal learning is more learner-centred, and due to its less hierarchical nature lends itself to greater adaptation to the needs of learners. Furthermore, it could be considered more attractive for learners due to its capacity to overcome the well documented barriers to participation in education.

The culture of non-formal education organisations is generally open, adaptable, horizontal, learner – led and responsive to the requirements of the individual and community. These attributes can facilitate non-formal education to overcome institutional privilege that pervades formal education systems and which reproduce educational inequality. One could consider that due to the nature of non-formal education, its institutional habitus, that it is more accessible, flexible and responsive to all learners and thus is a vital tool in combating educational inequality that pervades the education system.

2.3 In my country/region, when recruiting, employers give equal weight to knowledge, skills and competences acquired outside of formal settings as they do to formal qualifications.

Generally qualifications have a far higher weighting to the lived experience, knowledge, skills and competences that have not been validated. In Ireland educational attainment is highly linked to current prospects in the labour market. The unemployment rate for those with third level degrees and above is 7.5 percent compared to 12.7 percent on average. For those with below third level

educational attainment, unemployment rates exceed the national average (FORFAS). Although this may also be due to the lack of work/life experience one could also propose that those lacking qualifications are more likely to be unemployed because accreditation is important in the recruitment process.

2.4 In my country/region, in allocating places for courses, education and training institutions give equal weight to those whose knowledge, skills and competences have been certified following non-formal or informal learning as they do to those who have followed the formal route.
This is dependent on the level that the course is at and the educational institution involved. Generally, for non-formal education organisations there are no qualifying criteria for entry into a course.

For formal *further* education, if you are coming directly from school you will have to achieve a certain criteria of qualifications. For mature students experience, or non-formal and informal learning, can be used as meeting the criteria in lieu of a qualification.

For formal *higher* level education, if you are coming directly from school you will have to achieve a certain criteria of qualifications. For mature students there may also be set criteria of qualifications required and if this is not at the level for direct entry applicants then non-formal and informal learning can be used to support this application, depending on the institution.

A qualification obtained from a non-formal or informal learning setting can be used to gain entry to courses at formal further and higher level education institutions. In general, Institutes of Technology treat (Further Education and Training Award Council – FETAC) qualifications gained in formal or non-formal learning setting in the same manner. It is the qualification you have and not where you obtained it that is considered. A progression link scheme exists which aims to bridge the gap between a further education qualification and a higher education qualification. The scheme reserves a portion of course for students with a specific FETAC qualification. For general admission to Universities you can use FETAC qualifications, from all educational modes, as part of the entry criteria.

Because non-formal and informal learning can be placed on the national framework of qualifications individuals who obtain a qualification should be able to access all modes of education provision, transfer from one mode to another (non-formal to formal) and progression (up and through the national framework of qualifications).

2.5 What potential do you see for further development of non-formal and informal learning?

There is huge scope for the further development of non-formal and informal learning through the provision of certified education courses or activities with learning outcomes at all levels of the national framework of qualifications.

With the ability to validate the outcomes of non-formal and informal learning, there are greater options for learners regarding the kind of provision they would like to engage it in order to obtain a qualification. They will be able to make a decision whether they want to gain a qualification in a non-formal or formal learning organisation, or go through a process of recognition of prior learning (informal). The diversity of provision will allow learners to benefit from the kind of education that suits their needs. As such this will facilitate learners to benefit from more responsive, flexible, equitable, holistic and appropriate learning options which will facilitate greater engagement in lifelong learning.

Furthermore, it opens the doors for providing accredited learning that accommodates different learning styles and acknowledges different knowledges. As the accreditation process is based on learning outcomes there is scope for a sea-change in the kinds of knowledge that is valued. A more democratic form of accredited learning may result which supports a broader concept of valued knowledge. For example the dominant thinking in top-down formal education will not only be recognised as the valued knowledge and therefore there is an opportunity to foster greater acceptance, tolerance, openness and egalitarianism to our understanding, approach and provision of education.

3. Perceived Challenges

3.1 Main perceived challenges

- In my country/region, the existing validation schemes are more or less sufficient to meet needs.

- o strongly agree
- ▪ In my country/region, the existing validation schemes are generally considered to meet agreed quality standards
  - o strongly agree
- ▪ In my country, diverse validation schemes are in operation at national, regional and/or sectoral levels, but a coherent overall approach is lacking
  - o strongly disagree

3.1.1 Observations

It is important that diversity of education provision is maintained. Steps must be taken to ensure that all learning provision does not become formalised. The distinction between non-formal and formal accredited education provision must be preserved and that it does not result in the homogenisation of the education sector.

Ireland developed the National Framework of Qualifications in consultation with relevant stakeholders which resulted in an inclusive, effective process that has 'buy-in' from the non-formal education sector. In general, the process for validating the outcomes of non-formal learning by quality assured organisations is through the route of provision of accredited programmes. Recognition of prior learning (RPL) is also possible in order to obtain a qualification. However this is rarely used by non-formal education organisations and further development and understanding of its use is required.

Non-formal education is ideally positioned to provide RPL for hard to reach learners at the lower levels of the NFQ because it is effective in building the capacity of learners to identify the value of their informal learning and the applicability and feasibility of RPL through effective facilitation processes and support.

In order to engage learners in the process consideration should be paid to using the unique strengths of non-formal education including its open, welcoming environment, recognition of the lived experience of the learners and participatory methodology. For example, the group approach could be taken rather than viewing RPL solely as an individual endeavour. Benefits of a group approach include: reduced costs in facilitating the process; peer support; and as a learning activity

in itself. Through the process of group learning agreed assessment methods could be identified in order to provide the most effective approaches to competence identification. The group approach to RPL has been identified in the UK[1] and in Switzerland[2]. However research has generally focused on RPL in a higher level context so different approaches may be required for basic non-formal education.

3.2 In my country/region, validation forms an integral part of:

- national qualification systems
  - o strongly agree
- employment and labour market services
  - o agree
- enterprises human resource management practices
  - o don't know
- guidance and counselling services
  - o strongly agree

3.3 In my country/region, progress in validation is held back by:
- a lack of dialogue and co-operation amongst the stakeholders
  - o strongly disagree
- a lack of infrastructure and capacity at regional/local level
  - o tend to agree
- a lack of guidance and accompanying support for individual users
  - o agree
- a lack of information and communication to users
  - o tend to agree
- a lack of efficient and effective assessment methodologies
  - o strongly disagree
- a lack of appropriate tools to document learning outcomes
  - o strongly disagree
- a lack of trust in validation processes and outcomes

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[1] 2000. The Learning Trust. Effective Practice in APEL, UK
[2] Werquin, P. (2009) Recognition of Non-formal and Informal Learning: Islands of Good Practice, OECD, Paris.

- o strongly disagree
- a lack of financial resources
    - o strongly agree
- a lack of suitably trained human resources to carry out identification, documentation and recognition
    - o agree
- overly complex and time consuming procedures
    - o tend to agree
- institutional resistance
    - o tend to disagree

3.4 In my country/region, there is particular potential for further development of validation of non-formal and informal learning:

- acquired in the workplace
    - o strongly agree
- acquired through voluntary work
    - o strongly agree
- for young people
    - o strongly agree
- for migrants
    - o agree
- for workers in industrial sectors with high seasonality and mobility (e.g. construction, tourism, hotel and catering)
    - o agree
- for workers in industrial sectors related to skill gaps or growth areas
    - o agree
- for industrial sectors where, in several countries, new requirements are being introduced for staff professionalization (e.g. health care sector)
    - o agree
- for those recently made unemployed/redundant
    - o strongly agree
- for women returning to the labour market or learning after a career break

o　agree

　▪　for marginalised people or people at risk of social exclusion

　　　　o　agree

3.5 Please add any comments you may have on what you consider as the main unmet needs, constraints and potential for development of validation.

Due to the nature of non-formal education groups many have low capacity and are not funded to take on administrative work, therefore this can act as a constraint on groups wishing to engage in validated learning activities. For example in the Irish context many non-formal (community education) groups receive financial resources through a number of funding streams but very few cover the cost of administrative work. As you can see in the section 'education provision' and 'operational management' of fig. 1, funding for community education needs to cover all aspects of provision; however often funding only covers tutor hours. Therefore if there is a desire to encourage non-formal education organisations to provide accredited learning, funding to support this administrative-heavy work is required.

Fig.1 An overview of the funding requirements of Irish non-formal education organisations providing accredited learning.

4. Focus of EU Action and Possible Policy Priorities

4.1 Please tell us where you consider the focus of effort should be by indicating the level of importance you attribute to the different types of action the EU could take to further progress in the promotion and validation of non-formal and informal learning?

- Awareness raising
  - very important
- Exchange of good practice and peer learning
  - important
- Enhancing synergy between the existing European tools and frameworks that support validation (Europass, Youthpass, EQF, ECVET, ECTS)
  - important
- The development of a new mechanism for structured co-operation, such as a European network
  - very important
- The development of new practical measures at European level such as the introduction of a skills passport to document non-formal and informal learning
  - not at all important
- Strengthening the implementation of practical measures at national, regional and local level
  - very important

4.1.1 Observations

Raising awareness of the validation of non-formal and informal learning is important; however it would be useful to frame it in the context of the value of diversity of provision in the education system (informal, non-formal and formal). The very concept 'non-formal' is a comparison approach as it invokes the notion that it is not-formal and that the positive attributes of informality are not implied rather it is the absence of formality (Rogers, 2004). Therefore, in countries lacking a history of non-formal education it should not be promoted as a separate sector. In order to increase the recognition of non-formal and informal validated learning and for it to be considered on a par with formal education it must be presented as such.

Regarding the proposal for developing new practical measures at European level (such as the introduction of a skills passport to document non-formal and informal learning), it is worth reflecting on how this could potentially separate non-formal and formal education and thus reduce its perceived value. If all learning from formal, non-formal and information learning can be placed in the National Framework of Qualifications, it is not necessary to state where the learning took place. In order to gain parity of esteem validated non-formal and informal learning should not be viewed separately to validated formal learning.

4.2 Please tell us which areas you consider require particular attention by indicating the level of importance you accord to the following potential policy priorities for EU action

Scope/Coverage

- Reinforcing learning outside formal settings and increasing participation levels
  - o Very important
- Putting in place national validation schemes covering identification, documentation and recognition
  - o Very important
- Broadening access to validation opportunities, especially for young people having dropped out of school early, migrants and ethnic minorities, unemployed people, older workers and low-skilled adults
  - o Very important
- Giving particular attention to sectors where non-formal and informal learning play an especially important role in the professionalisation of staff (e.g. health and social care, volunteer based training organisations)
  - o Very important
- Ensuring validation opportunities are offered to citizens at an early phase of unemployment
  - o Important
- Encouraging enterprises to systematically integrate validation into their HR management and development policies
  - o Very important

<u>Value</u>

- Raising the status and value of non-formal and informal learning and validation as a complement to formal learning and contribution to personal development, society and the economy
  - Very important
- Enhancing comparability, transparency and trust across national boundaries
  - Important
- Improving the visibility of the knowledge, skills and competences acquired outside of formal settings, including through the development of a documentation system recognised nationally, across sectors and areas
  - Very important
- Systematically integrating validation into mainstream education and training and qualifications systems, including through making use of the scope offered by the development of National Qualification Frameworks linked to the EQF
  - Very important
- Building flexible pathways and encouraging transitions between non-formal/informal learning and formal education and training
  - Important
- Building links between validation and education/training credit systems to support recognition of qualifications
  - Very important

<u>Quality/Effectiveness</u>

- Strengthening quality assurance of validation processes and outcomes
  - Important
- Enhancing the professionalism and recognition of those involved in the provision of non-formal learning and informal learning opportunities
  - Very Important
- Making available fit for purpose and cost-efficient validation methodologies and tools
  - Important
- Putting in place mechanisms to ensure a systematic link between validation and guidance to accompany individuals going through validation processes

- o Important
- ▪ Systematically involve sector skill councils, social partners and chambers of commerce and labour in the development of mechanisms for the identification, documentation and recognition of non-formal/informal learning
  - o Very important

<u>Governance</u>

- ▪ Fostering partnership and co-operation between stakeholders and institutions involved in both the formal and non-formal sectors, (in particular in relation to learner access, progression and validation
  - o Very important
- ▪ Putting in place arrangements to ensure equitable cost-sharing of validation schemes
  - o Important

4.2.1 Observations

Role of validation for professional development non-formal adult educators

The European Commission study 'Alpine – Adult Learning Profession in Europe' which drew on European best practice and expertise from the peer learning clusters addressed the training and continuous professional development needs of non-vocational adult education practitioners in Europe. It noted the value of accrediting the prior learning of adult educators, much of it informal, as part of gaining a qualification because "practitioners normally enter the job after several years of work elsewhere, whether it is in education or not, they are in fact experienced workers. They have gained some knowledge of teaching and pedagogics which could otherwise have been learned by following a study programme." This would assist in developing the sector as many practitioners have teaching skills without having a qualification.

Furthermore, the ALPINE report also noted that "by acknowledging this existing learning and experience, the quality of the staff will increase. Registration, certification and accreditation of prior learning (APL) of adult learning practitioners contribute to the recognition and status of the profession. This may include not only teaching skills, but also organisational skills and knowledge."

Governance

Governance is fundamental to the growth and development of the adult education sector (including formal, non-formal and informal. In order to promote the value, create partnerships and share the development and cost of a method of validation, governance of the sector but be given the importance it warrants. It will also meet the objectives of: *Ensuring validation opportunities in employment, Integration of validation in HR by employers, for promoting the concept that non-formal and informal education complement the formal sector and will foster trust with other systems and improve visibility outside formal settings.*

Creation of a model of governance for the adult education sector (formal and non-formal)

In order to create a forum for dialogue between actors in the adult education sector a number of actions could be initiated so to ensure an effective and fruitful collaborative mechanism that meets the needs of all participants. The proposed model below is a suggested mechanism for creating a cost effective, lightweight governance structure which could focus on the validation of non-formal and informal learning as a task.

Possible process for model:

- Identifying the right partners from across the sector and Government departments
- Building trust amongst partners
- Finding common goals and interests for development
- Sharing resources
- Creating mutual benefits
- Setting clear expectations

The partners could define their respective roles in the alliance, establish operational procedures at an early stage, and agree on accountability, so to ensure an effective mechanism for the forum.

Benefits of the Forum

Some of the apparent benefits of creating a forum include:

1. A space to work collectively to create a dynamic, responsive, accessible and effective adult and community education sector

2. A reflective space that would allow analysis of National and European policy in this area

3. The creations of a strong and positive link between public and voluntary partners in adult and community education

4. Sharing experience of both public and voluntary partners

5. Sharing models of best practice, methodologies and research

6. Greater communication and collaboration across the sector

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