Scoping Report for Malta RPL Guidelines

Prepared by the SCQF Partnership

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Overview

We have provided brief summaries of European and Maltese referencing approaches to VNFIL and an overview of the legislation in Malta to date. A comparison has been provided for the Maltese institutions that have been surveyed in terms of their RPL policies by the ECVET experts involved in the ECVET project in Malta. A summary of the scope and key factors in the development of RPL policies and guidelines in Malta has been included again taken from research already conducted within the overall RPL project and a series of breakfast meetings with stakeholders. Finally, a comparison between the Scottish and Austrian qualification frameworks has been included in order to examine aspects of the different systems which may be able to be drawn upon in the production of a Maltese RPL policy and guidelines and an example of good practice in Scotland, which includes learner journey videos of two students, which concludes the scoping report.

Background and Purpose of this Scoping Report

The National Commission for Further and Higher Education (NCFHE) has seen a significant increase in requests from various education institutions to introduce RPL to their learning programmes in recent months. Thus NCFHE (the Commission) would like to regulate this to ensure that RPL policies are appropriate and beneficial to all stakeholders. The scoping report is the first work package in the four stage process to develop definitions and guidelines as part of the ECVET project for RPL for the Malta Qualifications Framework (MQF). This report shall draw upon the guidance within the 2016 NCFHE Referencing report, the Council of the European Union Recommendation (2012) On the Validation of Non-formal and Informal learning, the CEDEFOP (2012) European Guidelines for Validating Informal and Non-formal Learning existing legislation, current draft guidelines provided by institutions on existing processes and consider other approaches to RPL and VNFIL from Scotland and Austria.

Summary of the approach to VNFIL within the 2016 NCFHE Referencing report

This report was compiled in 2016 and presented to the EQF Advisory Group and accepted. It reflects the position at that time and relates the centrally operated processes for VNFIL.

The report covers some key concepts of VNFIL and defines informal learning as learning gained through daily activities such as cooking, and non-formal learning as learning embedded within planned activities although neither normally lead to certification. The validation of this learning refers to the process of formally recognising assessing and certificating this learning in terms of knowledge, skills and competencies. The key concepts involved are defined as informal learning, non-formal learning, validation of non-formal learning and the three dimensions to consider in respect of validation are reference to learning outcomes, standards against which assessment takes place and the process of how learning outcomes are validated.

The key principles for the process of validation in Malta are based on three key structures, one which oversees the overall process, one at sectoral level and one for guidance and support. The main overseeing structure ensures that there is an overall functional framework; caters for validation in relevant sectors; how the occupational standards are being drawn up; and how the validation process is implemented and the quality assurance mechanism put in place. At sectoral level representatives of the sectors involved are responsible for setting and updating occupational standards required to perform an occupation successfully. The learning outcomes are then used to validate the MQF level, e.g. a child carer can be validated at MQF level 4.

The validation assessment is carried out by experienced people from third parties such as Jobsplus, ITS and AME on agreement in advance by NCFHE, mainly based on a portfolio and always underpinned by an effective quality assurance system. Certificates are issued by NCFHE, not on the basis of a pass/fail system as candidates are given the opportunity to upskill and re-sit the assessment. Systems must have a system of redress to be deemed fair and transparent and should an assignment be revised and resubmitted the revision needs to be carried out by a professional not involved in the initial assessment.

Candidates are assigned a mentor who provides support and guidance to help the candidate identify and collect evidence and helps the candidate to demonstrate whether learning outcomes have been achieved.

The validation of informal and non-formal can help individuals and affect, education and employment prospects by enabling them to gain entry to education and training courses, or gaining a qualification related to a specific occupational standard. Malta's legislation relates to VNFIL with respect to occupational standards related to specific occupations.

Summary of the European Approach for VNFIL

A set of common European principles for identifying VNFIL was recognised by the European Council in May 2004. The principles relate to; Individual Entitlements which states that the process should be voluntary, there should be equal access and fair treatment with the privacy and rights of the individual being respected; Obligations of Stakeholders which states that systems and approaches for VNFIL should have appropriate quality assurance mechanisms and provide guidance counselling to individuals regarding these systems; Confidence and Trust states that the processes and procedures for VNFIL must be fair and transparent and underpinned by quality assurance mechanisms; Credibility and Legitimacy state that there should be a balanced participation from the relevant stakeholders and that the process should be impartial and that assessors need to be professionals with the relevant competencies. This will ensure that "All these aspects will give credibility and legitimacy to the certification obtained through validation".

The Council for the European Union state that VNFIL plays an important role in an economic crisis especially amongst young people in an aging population to improve the functioning of the labour market and increase mobility whilst enhancing competitiveness and economic growth. The Communique of the Conference of EU Ministers (2009) responsible for Higher Education "underlined that successful policies for lifelong learning should include basic principles and procedures for the recognition of prior learning on the basis of learning outcomes" and that member states should develop "clear routes into higher education (HE) from vocational and other types of education, as well as mechanisms for recognising prior learning and experience gained outside formal education and training". They also state that disadvantaged groups, including individuals who are unemployed or at risk of becoming unemployed may benefit most from VNFIL and increase their participation in lifelong learning and improve their chances in the labour market.

The guidelines for VNFIL discuss the basic validation features and identify a 4 phase process of identification, documentation, assessment and certification whilst focusing on the centrality of the individual. Conditions for developing and implementing validation procedures, validating contexts and tools should always respect the outcomes the learner hopes to achieve. They state that "Going through validation helps a learner to "exchange' the outcomes non-formal and informal learning for future learning or employment opportunities". The different phases of the process will be more prominent depending on the purpose of the validation arrangement, be that into a formal qualification or to enter into voluntary work. The purpose of the validation exercise is to provide evidence that can be exchanged into future learning or work. The paper discusses how different approaches to identification, documentation and assessment can be adapted depending on the situation, as long as they are valid and reliable and have been clearly stated at the start of the process to all the relevant stakeholders.

Section 2.1.3 of the CEDEFOP (2012) *European Guidelines for Validating Informal and Non-Formal Learning* discusses how linking assessment to learning outcomes is generally beneficial to validation and for RPL to be perceived as having the same value as taught provision that robust quality assurance processes must be in place. Quality assurance procedures should be transparent and in line with current QA frameworks in place. There is a section on the professional competence of practitioners (3.6), which adds to the trust in the RPL process by all stakeholders, and that practitioners should hold soft skills as well as being able to offer professional expertise in the subject area and validation process. The role of guidance and support is again mentioned. The paper discusses the focus on the individual's right for privacy, fair treatment and the availability of guidance and information. The 2014 inventory of national validation arrangements state that "Most countries have no single coordinating organisation for validation; instead, responsibility is shared across several ministries, or other national authorities, making

validation a transversal issue". The paper makes no recommendation on the amount of credit that can be applied for but does state that individuals can obtain a full or part qualification on the basis on VNFIL.

The paper states, in concurrence with the 2016 NCFHE report, that disadvantaged groups such as the unemployed or those at rise of unemployment, low skilled adults or migrants may benefit from validation arrangements by offering the opportunity to have their knowledge, skills and competencies validated by way of a skills audit. The discussion around skills audit raises questions about the validation process and that the creation of standardised assessment tools may lead to unintended bias. In implementing the 4 phase process in an employment validation process, the relevant issues of how employers will trust the outcomes and if the audit will be accompanied by a training plan are considered. The suggestion that the skills audit may be carried out by a national employment service is considered and the tools used for the validation such as one to one guidance and ICT self-assessment are discussed.

The NQF-in project (Sep 2015-Sep 218) looked at assisting countries across Europe to develop systemic approaches to include non-formal sector qualifications in their frameworks "Developing organisational and financial models for including non-formal sector qualifications in National Qualifications Frameworks". The main objective of the project was to provide evidence based support to governments and key stakeholders to develop policies on including non-formal sector qualifications onto NQFs. The report from the seven countries involved; Scotland, Ireland, Croatia, Czech Republic, France, Hungary and Poland is attached for reference. Whilst this project did not examine VNFIL, in order to define non-formal sector qualifications a useful definition of the difference between concepts of non-formal sector qualifications and VNFIL was included: There is a substantial difference between the concepts: "non-formal education sector qualifications" and "validation of non-formal and informal learning" (VNFIL) and they should not be confused. VNFIL refers to the process where an authorised body confirms that an individual has achieved learning outcomes in order to attain a qualification, whereas the term "non-formal education sector qualifications" refers to the types of qualifications functioning outside the school education system. Non-formal sector qualifications might be awarded also through a VNFIL procedure.

NQF-IN_IO1_final.pdf (nqf-in.eu) Information about the Project and proposed methodology of preparing country.

Existing Legislation in Malta

NCFHE, through legislation as follows, is entrusted to introduce a system for validation, set up the resources for the VNFIL department, create a national awareness of VNFIL, convene meetings with key stakeholders and develop National Occupational Standards. The legal framework is limited to a few sectors and NCFHE would like to extend this. The key principles are the main overseeing structure, structures at sectoral level, setting and updating occupational standards, conducting the validation assessment, issuing the certification, managing the system of redress and support and guidance. A more detailed summary of the legislation is offered below.

The MQF for Lifelong Learning Regulations S.L.327.431 (3) (3) (b) states that qualifications can be awarded after completion of non- formal and informal learning. Within S.L. 327.432 (4) (1) the Commission is the "competent authority responsible for the validation of non-formal and informal learning and for classifying such validation at a level of the MQF".

A hierarchy starting with Sector Skills Units (SSU) reporting to a Sector Skills Committee (SSC), which ultimately reports to the Commission, has been established to regulate and quality assure the awarding of VNFIL certificates in Malta. The SSC role is currently undertaken by NCFHE and the plan is to have a validation unit within NCFHE to replace the SSC. The SSC is formed by the Commission for a period of up to 3 years and is made up of members representing industry, education and training, employers and employees. The SSC formulates policies on SSU, criteria and standards for VNFIL, guidelines for the assessment of skills and competences for the purpose of granting awards, guidelines for quality assurance in non-formal learning, occupational standards relevant to each economic sector and sectorial qualifications frameworks referenced to the MQF. The SSC advises the Commission on all VNFIL matters, and on the advice of the SSU maintains and regulates marks of distinction and quality

assurance of non-formal education, promotes the benefits of VNFIL and sets up a register of persons awarded full or partial awards classified within the MQF.

The Sector Skills Committee oversees the appointment of validation process managers and external evaluators to ensure the ongoing quality and trust of the validation process. Corporate bodies who offer non-formal learning activities can apply to the SSC to be registered for a period of three years and have their awards validated by the Commission. These bodies are subject to the same quality processes as other regulated educational establishments in Malta.

Persons with a minimum of three years in a specific economic sector who have undertaken non-formal and informal learning may apply to the SSC to have their experience validated. The process: is voluntary and provides equal access and treatment, is transparent and underpinned by the principle of quality assurance. A person can apply for a maximum of two validations per year. A set process is written into the legislation under section (9) of S.L 327.432. The process covers areas such as: appointing trained guidance staff to assist the candidate, the procedures and methods of assessment considering criteria stipulated in occupational standards and the ability of the SSU to subcontract the assessment procedures. The legislation states that awards conferred by the Commission can only be awarded up to Level 5 of the MQF and shall have the same value as nationally accredited qualifications classified at the same level of the MQF. The assessment does not operate on a pass/fail system and applicants are told what knowledge, skills and competencies they still need and can then re-sit the validation assessment when they think they have gained the required knowledge.

The 2016 NCFHE Referencing Report makes specific reference to validation from the individual's perspective stating that if an individual has been working in a sector for a number of years it may be counterproductive to undertake formal training when they could demonstrate their knowledge, skills and competencies through VNFIL. The voluntary process focuses on: guidance and support, assessment by means of a portfolio and any other necessary tasks, how the outcome is delivered and the support around resubmission and the individual's right to contest the assessment.

Comparison of RPL processes within Institutions in Malta

As part of the ECVET Project the NCFHE has been working with two ECVET experts on the research for a set of RPL guidelines. This work included compiling all the best practices from different institutions in the country in a spreadsheet which was used as the basis for the comparison below together with further examination of the institutions' websites.

Malta College of Arts Science and Technology (MCAST)

MCAST offers RPL for admission to an MCAST NVQ and offers RPL for no more than 50% towards a programme of study. There is no minimum credit claim stated. To be eligible the candidate needs to be skilled in a particular area and be interested in upgrading their skills through an MCAST qualification. As qualifications are all vocational the rule of 3 years' sectoral experience will apply. No terminology noted to describe RPL. There is no reference to either specific or general credit. There did not seem to be an RPL policy on their website so this summary comes from the data presented through NCFHE

The application process is available following calls for application and fees are not specified. The procedure if a candidate fails the RPL process is not specified and an appeals process is stated as not in being place. MCAST have specified the various job roles and boards that will support the candidate and make the final decision and have specified that prior learning can only be used towards one programme of study. They have not specified if RPL is transferrable to another institution.

As evidence the candidate can use formal education certificates, CPD and other training certificates alongside references and photographs of completed projects in the form of a portfolio. Additional assessment methods are decided on an individual basis and are incorporated into an Individualised Learning Plan. There is no specification to say if the institution accepts formal qualifications which are not assessed, although due to an authenticity clause it is unlikely. Evidence must not exceed 10 years. Evidence must be valid, sufficient, authentic, current and relevant to the programme of study. Candidates are assessed against learning outcomes from the MCAST NVQ.   Units will be awarded if

the candidate can provide evidence in excess of 50% of each learning outcome. The candidate's transcript will clearly specify which units were exempted through the RPL process and will only be granted on completion of the entire programme of study. The institution has not specified if RPL is transferrable to another institution.

MCAST has chosen to enter into a Joint Award agreement with Northumbria University to train midwives in Malta to meet the national nursing shortage, and has been training midwives since 2017 in a 3 year BSc (Hons) Nursing pre-registration programme. "The degree programme will meet all of the requirements of the EU Directive for General Nursing; the Malta Council for Nurses and Midwives' Scope of Professional Practice; and Malta Council for Nurses and Midwives' Code of Ethics". MCAST are working within Northumbria University's RPL policy and procedures for prospective applicants on this programme.

University of Malta (UoM)

UoM offer RPL for both undergraduate and postgraduate programmes of study and has a published RPL policy on its website. It offers RPL for up to 1/5th of the total credits, although this is determined on a case by case basis. There is no minimum credit claim stated. There are no specific eligibility criteria stated. RPL and RAPL are the most common terminology used. There is no reference to either specific or general credit. A copy of the RPL policy is published on its website and observations have been taken from this and the data presented through NCFHE. The policy is here.

The application process involves making direct contact with Student Advisor Services and candidates are advised to start the process 8 months ahead of the starting date of their programme. The fee is stated as € 25. Candidates are given the opportunity to resubmit their claim when they can demonstrate further knowledge, skills and competencies to meet the full RPL claim or to undertake an appropriate access programme if they fail to gain entry via RPL. There is a formal appeals process in place should a candidate wish to dispute the result. UoM has specified the various job roles and boards that will support the candidate and make the final decision and has not specified that prior learning can only be used towards one programme of study. It does not specify if RPL is transferrable to another institution.

As evidence the candidate can use official transcripts accompanied by module specifications of any previous study, a reflective CV, a reference or any other verified evidence of their work to support their application in the form of a portfolio. Additional assessment methods may include an interview/oral assessment, a project, observation and if necessary, an English test. UoM does not issue an Individualised Learning Plan but sends the candidate an official letter confirming that RPL is being offered with reference to the exact course being applied for. The RPL policy accepts a wide range of evidence including "official transcripts" which suggest that only qualifications which have been assessed will be accepted. Evidence must not exceed 3 years. Evidence must be acceptable, sufficient, authentic, current and be at the appropriate level. Candidates are assessed against specific learning outcomes at the appropriate level (3.4 of RPL policy). Candidates are informed by letter to confirm if they have succeeded in their claim for RPL and an appeals process is in place.   There is no reference to how this will be shown on the candidate's transcript. There is no reference of when the credit is awarded, be that upon completion of the RPL process or at the end of the qualification in full. There is no detail regarding how an RPL claim will be shown on a candidate's transcript.

Gestalt Psychotherapy Training Institute Malta (GPTIM)

GPTIM offers RPL for admission and towards a programme of study. It offers RPL for up to 1/5th of the total credits, although this is determined on a case by case basis. There is no minimum claim stated. RAPL is the most common terminology of RPL in use. There is no reference to either specific or general credit. GPTIM has a set of principles common to all faculties and record RPL processes at faculty level to assist RPL practitioners to track decisions at the different stages of the process and standardise the presentation of portfolios. There did not seem to be an RPL policy on its website so my summary comes from the data presented through NCFHE.

The application process states that GPTIM will provide information that will include when the claim for RPL can and should be made. There is a fee although this has not been specified. There are no details

on the process of resubmission in the case that the candidate does not submit sufficient evidence. There is a formal appeals process in place should a candidate wish to dispute the result. GPTIM has a support mechanism in place to assist candidates with their claim for RPL. There is no specific evidence of who makes the final decision about a claim for RPL and if RPL can be used towards more than one programme of study. They have not specified if RPL is transferrable to another institution.

As evidence the candidate can use an official transcript accompanied by a module specification or syllabus detailing the learning outcomes, a reflective CV, job descriptions or details of any specialist training and any other relevant evidence to support their claim in the form of a portfolio. Additional assessment methods state that the form of assessment should be appropriate to the type of learning that RPL is being sought for. These include a viva, presentation or learning logs. GPTIM has not specified if an Individualised Learning Plan or an alternative is used when advising the candidate on the outcome of their RPL claim. The research presented suggests that only official formally assessed qualifications are acceptable. Evidence must not exceed 3 years. Evidence must be acceptable, sufficient, authentic, current and be at the appropriate level. Candidates are assessed against specific learning outcomes at a modular or programme level. RPL that has been accredited will be clearly identified on a candidate's transcript.

Institute of Tourism Studies (ITS)

ITS offers RPL for degrees, modules and units of study and has a published guide to RPL on its website. The institution offers RPL for up to 50% of the total credits. There is no minimum credit claim stated. There are no specific eligibility criteria stated, although candidates must meet 3 compulsory key competencies in English language, mathematics, and digital literacy. RPL and Credit Transfer are the terminologies it uses. There is no reference to either specific or general credit. A copy of the RPL guidance is available on its website and observations have been taken from this and the data presented through NCFHE. https://its.edu.mt/courses-admission/recognition-for-prior-learning.html

ITS has 3 application cycles for RPL in January, April and September, with assessments taking place in the following 2 months after applications. There is a fee although this has not been specified. Candidates are permitted to resubmit their claim for RPL if there is a skills gap identified in the original submission. There is a formal appeals process in place should a candidate wish to dispute the result. ITS has a support mechanism in place to assist candidates with their claim for RPL. There is no specific evidence of who makes the final decision about a claim for RPL and if RPL can be used towards more than one programme of study. The institution has not specified if RPL is transferrable to another institution.

The website has a table listing the types of acceptable evidence and these are categorised under the following headings - very strong, strong or useful. Some examples under the very strong category include approved certificates, CV, job description, competency conversation, log books and samples of work in the form of a portfolio and an online self-assessment. Alongside the portfolio and online self-assessment each candidate is expected to have a one-one technical interview with a subject expert, which may identify skills gaps and additional practical evidence required. ITS has an RPL process on its website taking the candidate clearly through the steps in the process. The website refers candidates to MQRIC to have qualifications evaluated and suggests that formal qualifications that have not been previously assessed are acceptable. A specific timeframe of currency of qualifications as evidence is not mentioned, although currency may be assessed within the assessment exercises. Evidence must be authentic, relevant, sufficient, and valid. Candidates are assessed again specific learning outcomes at a modular or programme level and where required meet the competences set out by the relevant sector skills committee. There is no information on how credit awarded through RPL will be obtained or displayed on a candidate's transcript.

Institute for Education (IfE)

IfE offers RPL for modules and programmes (both mandatory and optional) and for entry to a programme of study where the candidate has considerable relevant experience in the field. It offers RPL for up to 1/3 of the total credits. The minimum credit claim is equal to the smallest module within the programme of study being undertaken. There are no specific eligibility criteria stated to be

considered for RPL. RPL is the terminology used. Specific credit is defined as "where prior learning matches in terms of volume and content of Learning Outcomes of a course or module" and general credit is defined as "where prior learning is recognised to be of sufficient depth and quality as to be assigned as specific level and amount, but which cannot be matched to the subject content of a chosen award programme". A copy of the RPL guidance is available on its website and observations have been taken from this and the data presented through NCFHE. The policy is [here].

IfE asks that claims for RPL should be made at least 2 months prior to the start of the course and RPL is differentiated by RPL certificated and RPL informal/ non-formal. There is no mention of a fee. It is not specified if candidates are permitted to resubmit their claim for RPL if their original submission is insufficient, however there is a formal appeals process in place which may offer the candidate an attempt to revise their submission should a candidate wish to dispute the result. IfE has a support mechanism in place to assist candidates with their claim for RPL. The Institute Academic Board makes the final decision about a claim for RPL. There is guidance stating that double counting of prior learning must be avoided, and that credit gained through RPL can only be accumulated towards one single award at any given level.

The evidence a candidate can use is separated depending on the type of claim. Evidence required for RPL of formal learning must be an official transcript accompanied by unit outlines. Evidence required for RPL for non-formal and informal learning can include certificates from non-accredited courses from various training providers and online courses such as MOOCS, training records, case studies, employer's references, job descriptions and certificates by employers and professional bodies. The use of a portfolio is mentioned as an additional task and not as the basis of the task. IfE writes to candidates within 2 weeks of assessment explaining the outcome. IfE accepts formal qualifications that have not been assessed for the purpose of non-formal and informal RPL. Evidence must not exceed 10 years for formal learning and for informal learning must be within 5 years. Evidence must be, current, relevant and authentic and be at the appropriate level. Candidates are assessed against specific learning outcomes at a modular or programme level. It is unclear if RPL is identified on a candidate's certificate, however it is noted that it does not count to any grade point average.

Brief Summary of the Institutions Reviewed

- The institutions vary in terms of the applicability of RPL, for either admission or credit towards a programme of study.
- All of the institutions state a maximum amount of credit that is permitted to be claimed through RPL and this varies from 20% to 50% by institution. IfE state a minimum credit claim for RPL when the others have not specified this.
- The eligibility to claim RPL is stated by MCAST, the others have no specific eligibility criteria.
- The terminology used for RPL is variable between institutions with acronyms such as RPL, APEL, APL, RAPL, RCPL to name but a few.
- IfE has a formal definition for specific and general credit, none of the others have specified this.
- A portfolio is used to gather evidence in all cases with the exception of IfE where it is not mandatory.
- The types of acceptable evidence are similar across all institutions and broadly speaking all institutions look at currency, authenticity, validity, relevance and level.
- Currency of qualifications are mostly unspecified with MCAST stating 10 years and UoM stating 3 years.
- Institutions are not specific about accepting formal qualifications which have not been assessed.
- Applicants within institutions are all assessed against learning outcomes.
- Most institutions have set application times and ITS and UoM have a policy which allows candidates to resubmit their application with updated information.
- All institutions have a formal appeals process, however the research from NCFHE states that MCAST has no formal process in place.
- IfE and MCAST have clear policy statements on the counting of credit gained by RPL to avoid double counting, the others have not specified this.

- MCAST states that RPL claims are only awarded on completion of the programme of learning. The other institutions have not specified when the award is made.
- Outcomes of RPL claims are made by letter except for MCAST which issues an Individualised Learning Plan.
- MCAST and GPTIM specify that credit awarded on candidate's certificates will be marked as being achieved through RPL, the others do not. IfE mentions that RPL credit will not contribute to grade point average.
- Support mechanisms and roles for guidance and validation panels are in place for all institutions.
- Fees policy are variable by institution.

Summary of key factors in the development of an RPL Policy and Guidelines for Malta

As mentioned above, part of the ECVET Project the NCFHE has been working with two ECVET experts on the research for a set of RPL guidelines. The ECVET Experts have compiled draft guidelines with a set of questions that the education institutions would need to answer when submitting their RPL policies. A number of breakfast meetings have also been held in order to gain opinion from institutions, NCFHE staff and other stakeholders.

NCFHE indicated that it would be looking to develop a list of definitions including RPL and APL and in view of the fact that there is already the subsidiary legislation for the Validation of Non-Formal and Informal Learning (detailed above), a need to differentiate between the various types of RPL and VNFIL, and the various terminologies (APL, APEL).

It has also been indicated that the policy and guidelines should be developed with the following principles in mind:

- The policy and guidelines should include a minimum set of requirements as a threshold that would need to be fulfilled by institutions rather than a definitive set of 'rules'.
- There is no immediate desire to impose RPL on institutions, although this may depend on uptake and implementation
- The policy and guidelines need to be flexible to allow institutions to implement across different programmes that they offer and also to accommodate where institutions are working within RPL processes of overseas partners and where the requirements of 'licensing' or professional bodies need to be met
- There needs to be a recognition of the need for quality assurance to underpin the process of RPL operated by institutions

The draft guidelines created by the ECVET Experts posed a set of questions covering the following topics for institutions to help them formulate an RPL policy and guidelines for their institutions

Policy
- Applicability
- Exemption limitations
- Terminology and definitions

Guidelines
- Application process
- Fees
- Support for Applicants
- Qualifications, experience and recruitment process of assessors
- Evidence accepted (ie currency, proof of authenticity etc)
- The process of evaluating the evidence
- Additional tasks required of the applicant
- Notification of outcome to applicant
- Resubmission/Appeals process

- Certification/award of exemption

Comparison of RPL between the Scottish (SCQF) and Austrian Qualification Framework (NQF)

In the project proposal we indicated that it would be useful when developing policy and guidelines to draw on information from Scotland, Malta and elsewhere. To this end we have compiled a table outlining the key features of the RPL principles and guidelines in Scotland and as a comparison of another approach have selected that of Austria using the CEDEFOP report on VNFIL 2018. The Austrian NQF is also a voluntary framework which encompasses formal and non-formal qualifications and the country also has an overall government strategy for RPL.

The following table looks at a few key principles and contexts that currently underpin the approach to RPL between the systems, all references regarding Austria are from the http://libserver.cedefop.europa.eu/vetelib/2019/european_inventory_validation_2018_Austria.pdf

Scottish SCQF	Austrian NQF
No overarching government strategy on RPL although recent guidance for the early education and childcare sector has been published. The quality body for Universities (QAA) created guidance on RPL within the HE sector a number of years ago. There is no national "right" to RPL for candidates and this is currently at the discretion of the body accepting the claim for RPL. The SCQF is a voluntary framework which includes formal (school, FE or HE), work based and general interest learning programmes and there are currently more than 11,500 learning programmes on the framework. The process for inclusion on the SCQF is the same regardless of the type of programme. The basic pre requisite is that all learning programmes are learning outcome based, quality assured, formally assessed and have a minimum of 10 notional hours of learning. All programmes are credit rated using the SCQF Principles and Level Descriptors.	An overall government strategy for RPL/ VNFIL based upon: COUNCIL RECOMMENDATION of 20 December 2012 on the validation of non-formal and informal learning (2012/C 398/01) was published in 2017. A current AQ Austria project supports HE institutions in implementing RPL. There is no national "right" to RPL for candidates and this is currently at the discretion of the body accepting the claim for RPL. The Austrian NQF is also a voluntary framework and there are currently more than 2500 programmes of study on the framework. The Austrian NQF differentiates between formal qualifications (which have a legal basis) and non-formal qualifications (without a legal basis). The basic pre requisite is that all learning is learning outcome based, "which are assessed and validated by a competent authority, according to current plans NQF service centres will be selected and authorised by the Ministry of Education based on a transparent procedure".
Approach to RPL: Section 4.0 of the SCQF handbook contains seven key principles to support organisations to work within quality assurance aspects of RPL including Credit Transfer. These are included in the overall set of 25 key principles which underpin the use and quality assurance of the SCQF. RPL in Scotland is considered for formal, informal and non-formal learning and is looked upon holistically be receiving organisations, who may accept credit transfer and summative RPL for any type of learning within one claim.	**Approach to RPL:** Four federal ministries supported by all key stakeholders agreed on a joint strategy based on a set of guiding principles, benchmarks for 2020 and ten action strands to create a national validation strategy (to overcome a fragmented validation landscape) whilst developing a cross –sectoral quality assurance system.

Types of RPL	Types of RPL
Formative RPL: Based on an informal process of benchmarking against SCQF level descriptors- no formal assessment. This type of RPL cannot be used to award SCQF credit. Used to aid planning and progression. Its purpose is to build a learner's confidence, to recognise skills and knowledge gained through experience and identify ways in which these can be developed through further learning or career opportunities.	**Formative RPL:** "Approaches to formative validation include a process of reflection on a person's competences with the primary goal of increasing their motivation to engage in learning. The focus is on *identifying* and *documenting* competences to empower individuals. The identification and visualization of acquired competencies takes place independently of the place and context of competence acquisition and independent of defined standards of the qualification system. These approaches do not lead to certification but can possibly lead to further steps in this direction."
Summative RPL: Based on process involving formal assessment of evidence and awarding of SCQF credit points – certificated achievements. Used to award SCQF Level and Credit Points (normally to allow entry with exemption from formal qualifications). Entry to or award of credit within a programme of formal learning if the outcomes of the prior informal learning are judged to be equivalent to the programme outcomes for which they are seeking credit	**Summative RPL:** "Summative validation approaches are based on requirements and standards of the qualifications system. They include in particular, steps to *assess* and *certify* acquired competences on the basis of the standards defined for a formal or non-formal qualification (in line with the existing regulations and responsibilities for obtaining the respective qualification). These approaches aim at the acquisition of a qualification or a part of a qualification. In most cases, they also integrate formative process steps or individuals are using formative approaches before engaging in summative validation measures."
Credit Transfer: is when a learner is allowed to gain entry using a previous credit rated qualification to a higher level within a programme of study, sometimes referred to as advanced entry or advanced standing using formally certificated learning. This will mean that a comparison of the learning outcomes between one qualification the next has been completed. The award of credit is at the discretion of the receiving institution and therefore the volume awarded can differ depending on the qualification that the learner seeks and the qualifications already held and the institution approached. An example would be if a candidate leaves an institution with a volume of credit and wishes to transfer this to another institution. Credit transfer in Scotland is a well-recognised process and is used extensively to allow progression from VET to HE.	**Credit Transfer:** Austria does not have an explicit credit transfer system and European credit transfer systems are only partly being implemented "However, there are credit arrangements in the form of regulations governing the crediting of learning outcomes if learners change between training institutions and/or training levels. Most of these regulations refer to the crediting of learning periods and are based on a comparison of curricula or training plans" (Tritscher- Archan & Nowak)
Which sectors are involved: all sectors.	**Which sectors are involved:** all sectors, although due to the legal framework, the HE sector in Austria has most experience in access at universities of applied science and CVET.
Assessment and validation: assessment methods will vary between institutions and	**Assessment and validation:** Austria, alongside a system of second chance education has "a

sectors depending on the learning outcomes skills and competences that need to be demonstrated.

To promote confidence in the system of RPL assessment should be *acceptable, sufficient authentic and current* and that processes should be *learner-focussed, accessible to all, flexible, reliable, transparent and consistent, and quality assured.*

SCQF RPL principles note that the processes of assessment for RPL must be consistent with the normal assessment and quality assurance of the organisation and that the monitoring and review of the operation of RPL procedures should be clearly defined and integrated within the normal assessment and quality assurance of the organisation.

The principles also state that RPL is given for learning, not for experience alone. An example would be if a learner has worked for a period of time and can demonstrate learning from their work experience to the learning outcomes of a programme of learning then SCQF credit can be awarded upon appropriate assessment to learning outcomes.

traditionally strong orientation of education and economic culture towards the initial vocational education and training (IVET) sector; the dual system, which already incorporates a large amount of informal workplace learning (and, thus, there is no need for additional procedures to recognise this form of learning)" candidates are legally permitted to access formal education and training programmes by RPL, like Scotland the procedure in HE is delegated to individual institutions.

Whilst developing the validation strategy for RPL in HE the government is exploring existing arrangements emphasising that RPL for informal and non-formal learning must be *quality assured and transparent* and policy makers include: supporting procedures by incentives in the form of project funding, the legal basis for RPL, candidate's rights for verification and to ensure the process is free of charge supported by external financing.

In CVET/ adult education some are legally regulated. Validation methods with unclear links to any formal systems are not regulated except those providing access to the labour market. Candidates can be offered short upskilling training before sitting any formal assessment and are permitted to sit exams or entrance tests without attending any formal teaching. Candidates in Austria can sit the final apprenticeship examination without having undertaken the formal training if they are over 18 and have evidence of the required work experience to demonstrate the appropriate skills and knowledge.

Quality Assurance: Principle 23 of the SCQF handbook states that "RPL for the award of SCQF points must involve formal assessment or acceptance of evidence of learning which is quality assured". The principle accepts that having prior learning assessed for credit transfer or other purposes of RPL must involve some form of judgement and that institutions should have their own regulations in place for this,

The judgement must be recorded that on acceptance of some, all or part of the SCQF credit points with previously formally assessed qualifications or on the content of materials provided for experiential learning as evidence and the evidence must be formally assessed.

Quality Assurance: "there is no comprehensive quality framework and there are no common standards for the validation of non-formal and informal learning in place." The extent and way validation initiatives are underpinned depend on the measure and context. As different ministries are responsible for different qualifications and for the QA activities. Many initiatives and procedures for validating non-formally or informally acquired competences are within the formal education system and the same QA systems are within the sub-systems. The thematic working group on quality within the national validation strategy "aims at the development of a common understanding of quality by issuing a set of quality criteria" for different measures and areas. As the system outside formal learning is so diverse there it is not possible to provide an overview. The catalogue of quality criteria within VET and adult education was published in Spring 2018 and refers to key principles of, general quality control, public relations and information, clearing and agreement, counselling and support, validation focussing on

	identification and documentation, validation focussing on assessment and certification and outcomes for candidates.
Minimum/ maximum % award: there is no government guidance on this and this will vary between sectors and institutions depending on their own policies.	**Minimum/ maximum % award:** there is no government guidance on this and this will vary between sectors and institutions depending on their own policies.
Certification: there is no government guidance on this and HE or training providers can either admit candidates or offer credit gained by RPL (credit transfer and informal, non- formal) in line with their own policies. Currently there are no formal certificates awarded purely on the basis of RPL or VNFIL in either the higher or vocational sectors in Scotland. There is no central repository where data is collected on who gains qualifications through RPL or VNFIL.	**Certification:** the Austrian HE system can offer admission or partial credit by the recognition of informal and non-formal learning, however as in Scotland candidates cannot gain a complete award on this basis.
Skills Audit: Skills Development Scotland (SDS) Scotland's National Skills Agency offer support and guidance to individuals from school age right through their careers to help people take stock of their skills and move between careers should they need to or wish to. The service can be accessed online and face to face and can be used to improve self-esteem and confidence as well as to improve employability prospects. Employers can use a skills audit and the SCQFP supports them with an RPL workshop and has published a set of contextualised level descriptors called the SCQF [Employer Levelling Tool](#) together with an [Employer Guide](#) to help them with the process. Employers often offer in house training if they identify a gap in skills and this is sometimes certificated, it is the employers choice if they use training that is on the SCQF or they can offer in house certificates. The SCQFP offer individual support to employers to assign an SCQF level to job roles to widen the recruitment pools. See below about other current projects aimed directly at refugees and asylum seekers. The SCQFP also runs a workshop My Skills My Future aimed at training guidance practitioners assisting younger people who have left school with few qualifications to look at the skills and competences gained in hobbies, voluntary activities and daily life that can be benchmarked up to SCQF level 6.	**Skills Audit:** the term is not systematically used in Austria however several initiatives can be linked to the 2012 Council Recommendation on VNFIL. Some of the terms used include, competence balance, formative validation approach, competence profiling and competence audit. Due to the fragmented landscape there is no comprehensive picture of skills audit initiatives. The Public Employment Service (PES) carried out "competence checks" in 2015 targeted at migrants and refugees to understand their qualifications and competences, which included elements of validation of informally acquired competences. PES offer support and guidance in the context of careers planning, adult guidance and services offered to migrants and asylum seekers, and in many cases offered in cooperation between partners (e.g. adult education centres training providers and social partners and financed by PES). Some companies have procedures in place for documenting competences as part of employee personnel development planning and in some cases certificates are offered. In the youth sector a nationwide initiative "What I can do through informal learning" for documenting and recognising informally gained competencies was rolled out in 2015. A portfolio is usually developed, that leads to a certificate, that can be presented for specific job applications in two half day workshops with around eight to twelve participants to enhance the participant's ability to recognise and describe their competencies.
Who benefits: no restrictions on who benefits, people of all ages looking to upskill or benchmark their skills and competencies to improve confidence or self-esteem. People looking to use their existing qualifications to move into advanced training without duplicating learning, thus saving time and money.	**Who benefits:** no restrictions on who benefits although it is assumed that low qualified people and those from socio- economically disadvantaged groups will benefit most. The reference to second chance for access is mentioned to increase employability and motivation for education.

Employers benefit from motivating staff and improving staff motivation.	
Guidance support: guidance can be offered by professionally trained Careers Guidance professionals, but often guidance is delivered by staff working in the relevant sectors who have an in depth knowledge of the processes and procedures of their organisation (for examples in HE institutions), professional, private or third sector organisations that work within a specific sector. There is no mandatory requirement for guidance staff to be professionally qualified.	**Guidance support:** guidance is offered on site by HE institutions and by external experts and the AQ. Austria published a summary document with recommendations to all HE institutions. Guidance can be provided by PES and skills audits are sometimes offered by freelance guidance practitioners and the third sector. "There is no specific profile of professionals carrying out validation processes in Austria." It is sector specific and can be teachers, career counsellors, experienced professionals and members of respective authorities and ministries. There are no mandatory requirement for validation practitioners to be professionally qualified.
Fees: There is no national fee structure in place to provide RPL to candidates and the cost of this will vary between organisations.	**Fee Structure:** There is no national fee structure in place to provide RPL to candidates and this will vary between organisations.
Examples of current projects and initiatives: SCQF are working in partnership with Skills Development Scotland, the national skills agency on a system of RPL for apprentices who have been unable to complete the formal training element of their programmes due to COVID 19. There is also a project in partnership with a University to create a process for benchmarking the knowledge, experience and skills of refugees and asylum seekers to the SCQF and another project with the British Army looking at the benchmarking of the infantry and early leavers of veterans to move them into employment in Scotland. The NHS in Scotland is in the early stages of rolling out a national RPL programme aimed at encouraging healthcare assistants and other non- clinical workers to use RPL to apply for new jobs or further training to upskill and become professionally qualified in conjunction with local training providers. As stated earlier there has been some guidance published for the use of RPL in the Early Years and Childcare sector	**Examples of current projects and initiatives:** "Du kannst was!" (You have skills/competencies!) a project to validate skills and competencies of formal and non-formal learning leading to an award of the apprenticeship certificate/ diploma in a two-step exam. Initial guidance, training workshops and production of a portfolio are checked and any skills gaps identified can be filled by appropriate training before the final competence check is carried out. There are ongoing discussions to role this out in the national strategy for VNFIL. The project aims to fill labour market needs in specific regions. People who are qualified as nursing helpers/ carers should now be able to obtain level 2 nursing assistant roles if they have worked in the profession for many years by crediting skills gained by their experience. The ministry responsible for public universities has plans in the next 3 year agreements (2019-2022) to implement concrete projects on the subject of validation, this will not be mandatory but 10-12 universities will take part. The Austrian University Development Plan is creating binding and transparent validation procedures for informal and non-formal equivalent assessment and recognitions procedures for admission and crediting to a curriculum in the applied science sector.
Additional relevant information: the SCQF Partnership has developed an RPL Online Toolkit to offer guidance and signpost candidates, educators and advisers, and employers on how to start or assist a candidate through the process of seeking RPL. The Partnership also offers capacity building workshops to all sectors to introduce the basics of RPL with a specific workshop aimed at	**Additional relevant information:** the Austrian NQF is currently developing an online tool to offer support and guidance on RPL.

| employers to raise awareness and understanding of RPL. A number of real life case studies which demonstrate RPL (Appendix 1) are also available to demonstrate good practice. | |

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Appendix RPL Case Study

Real Life Case Study – UWS BA Business (Hons) RPL Procedures

Background

The University of the West of Scotland (UWS) is widely known as a widening participation University and has well established practices surrounding RPL*. Here is the established route that they use for admitting students with relevant work experience with advanced standing using SCQF RPL principles and adhering to UWS quality procedures. We hope that this example provides some practical advice and guidance that you may find useful.

This route offers candidates advanced standing (entry to the programme at an advanced stage) to the BA Business (Hons) programme through the University's Accreditation of Prior Experiential Learning (APEL*) policy. As a rule of thumb 5 years' management experience is the minimum for admission through the RPL route, although some of the applicants are managers with up to 20 years' experience and are looking for a degree to progress their career. UWS recognises that the breadth and depth of this experience can be mapped to the programme learning outcomes and work with candidates on an individual basis to offer SCQF credit at levels 7, 8 and 9 through a structured and tested RPL process. Admission to the programme at an advanced level is awarded on completion of the process. The successful candidates will have demonstrated the currency, depth and breadth of their learning to support the SCQF credit awarded and will have gained confidence in their ability to write in an academic manner and be fully accustomed to using UWS systems. Two video case studies are presented to demonstrate the success and future career path of students that have gone through the process below.

Facilitation and Guidance

Selected candidates, who have requested admission through an APEL claim or have referenced considerable relevant work experience within their application, are invited to a structured one to one guidance appointment with an experienced guidance adviser who takes the candidate through:

- SCQF entry levels
- Types of evidence
- Academic writing style
- Procedure and process
- Timelines
- Outcome

The candidate is shown an example of a previous anonymised portfolio to familiarise themselves with the types of evidence and the style of academic writing required for a successful RPL claim. The process of submission and support alongside clear guidance on the timelines and UWS internal and external quality processes are all explained at this point.

Next Steps

Should the candidate wish to proceed with an APEL claim, they are asked to complete a unique UWS module called Making Experience Count SCQF level 7. The module runs online over one academic term during which the candidate submits their work. The module has specific learning outcomes based upon

reflective practice and is assessed by the portfolio containing a written statement of learning with associated evidence.

Breadth, Depth and Currency

The candidate is asked to submit an up to date CV, which includes all other SCQF credit rated programmes such as HNC/partial degree that may be taken into account, and to complete a personal chronology of their work experience.

The personal chronology and CV are the starting point in the RPL process: a detailed reflective account of what they have done, what they have learned and the evidence they can produce to support this. Reflecting on experience can be challenging and each candidate is advised that they must submit a variety of different activities that can demonstrate the currency, breadth and depth of their learning and link this to the overall learning outcomes of the programme. The experienced guidance advisers ask the applicants to reflect upon what they do and, if they repeat these exercises, what they did differently as this is where learning takes place. This part of the claim is crucial in the process as it is then scrutinised by a subject specialist (academic supervisor) who maps the candidate's learning to the learning outcomes of the programme and decides if the candidate has the appropriate depth and breadth of learning and that their learning is up to date. This process involves consideration of the specific experiences highlighted by the applicant and judging the equivalency of the experience to the explicit learning outcomes of the programme of study. The candidate's experience may only satisfy the learning outcomes of certain modules within the programme depending on their experience - an example would be that a candidate has no experience in accounts and has much more experience in marketing and credit will only be awarded where experience can be mapped to the programme learning outcomes. An estimate of how much SCQF credit could be awarded is discussed and the candidate must complete the written element of the claim and submit an acceptable portfolio of evidence before a final decision is made.

Tailored learning outcomes are written, and guidance upon the word count and expectation of academic writing style alongside timescales for the completion of each stage of the portfolio are agreed between the applicant and the academic supervisor.

The candidate submits written work, which must take account of their own experience and reflect upon appropriate academic theory. Constructive feedback is offered on each learning outcome until the final portfolio is presented, alongside the evidence indicated within the personal chronology. Where a candidate submits an RPL claim in excess of 60 SCQF credit points a presentation is also required as part of the assessment. The candidate presents to the guidance adviser and both academic markers, who are all permitted to question the candidate about their work.

Throughout this process applicants are registered students at the university so have access to all student support facilities and the continued support of their academic supervisor and a guidance adviser.

Quality Procedures

All claims for APEL must go through the usual University Quality procedures of internal marking with each claim being double marked and verification by a subject external examiner. The assessment methods of a portfolio and a presentation are consistent with the type and quantity of assessment from all other UWS modules and standards adhere to the strict quality standards applied to all academic assessment.

*RPL and APEL are some of the terms used to describe the process of Recognition of Prior Learning

Real Life Success Stories

Below are links to two short videos of UWS students who have gone through the RPL process which feature on the SCQF website

[Morag's](#) Story

[Brian's](#) Story