

Chapter 4

Accreditation of Learning and Vocational Qualifications



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Abstract This chapter deals with professional qualification accreditation processes. We focus on the recognition of work experience and non-formal training paths recently developed in Spain. The chapter aims to provide a comprehensive view of the accreditation procedures and to what extent their promotion has changed the panorama and the set of rules that regulate the VET system. The author looks at the ways formal elements of the procedure are structured, their explicit functions, the rules and relations upheld by legislation, as well as the recognition of learning through the analysis of governance management. The findings are framed within European, Spanish and local legislation with regard to the accreditation of professional qualifications. The discussion focuses on the roles of the agents who take part in this procedure and on the conditions for its implementation.

Keywords Validation · Competences · Vulnerable groups · Social inclusion · Evaluation system

4.1 Introduction

The new socio-political and economic contexts of Western society are interpreted from the point of view of transformation and uncertainty (Bauman 1999; Beck 2006; Morin et al. 2002). Current technological progress has great impact on production processes. In this environment, the constant updating of skills, knowledge

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and competences has become a key factor of economic growth and individual welfare (OECD 2001; Ottersten 2004; Werquin 2007). The emergence of new qualifications, the progressive specialisation, instability, unemployment and mobility, as well as the frequent changes of activity during the working life, seem to require the visibility of learning attained.

The validation and accreditation of skills acquired through non-formal and informal education is a procedure aimed at bringing visibility to skills, knowledge, competences and professional qualifications. Cedefop (2008, 2012) and the European Council (2012) define this evaluation system as the public, formal certification defined over time on the work capacity demonstrated by citizens. Validation and accreditation is a project of special interest in countries, professional fields and population sectors where a large number of the subjects have no formal qualification but have professional competences. This is the case of Spain and Portugal.

The goal to convert Europe into a knowledge-based economy led to significant efforts by the European Union (EU) to dignify VET and promote access to it throughout life and to facilitate the transition of vulnerable groups into the labour market. The importance of establishing systems for the recognition and accreditation of learning attained in informal and non-formal spaces has been considered as a key issue in the policy of lifelong learning in Europe (European Commission 2004, 2010; Official Journal of the EU 2015). The Third Global Report on Adult Learning and Education (GRALE III), UNESCO (2016), analyses the results of the Global Observatory of Recognition, Validation and Accreditation of Non-Formal and Informal Learning: 71% of a sample of 133 countries had a political framework to recognise, validate and accredit non-formal and informal learning. The last European inventory on the validation of informal and non-formal learning (Cedefop 2016) still brings to the fore how some EU countries are lagging behind in the recognition of education and learning. In this report, it is generally considered that the efforts made in Spain are not enough to reach out to all possible beneficiaries and give them validation opportunities in line with the needs of the job market. An increase in funds is also required to promote the level of qualifications as an employment policy measure. The Committee of the Regions considers that the proposed measures cannot be sufficiently implemented by the states (Official Journal of the EU 2015). This opinion announces policy recommendations intended for the creation of a pan-European strategy that would limit the decision-making of states, regions and local authorities.

Current changes in the economic and labour world push the educational system towards a new, more complex situation, which requires spaces for reflection and debate. In the present context, construal of the curriculum is based on two dominant discourses: the neoliberal and the more humanist standpoints. The first one is focused on favouring the development of professional competences that are required in the labour market; and the second includes the integral development of the human being in professional training. The validation and accreditation of competences, also called Recognition of Prior Learning (RPL), reflected the debate on lifelong learning policy, oscillating between social and economic perspectives. Different international bodies take positions poles apart in this debate. While the UNESCO

uses a discourse which claims the social importance of learning “for being yourself”, the OECD is in favour of supporting economic improvement (Duvekot 2014). The current trend in the EU, after getting through a major socioeconomic crisis, tends to give priority to the validation and accreditation of professionalising competences meeting the demands of the labour market. The accreditation system in Spain also has this neoliberal stance.

It is increasingly evident that learning does not take place exclusively in regulated learning environments. In this system for evaluation and accreditation of learning and vocational qualifications, there is no concern about how learning has been accessed (Souto-Otero 2012; Tejada 2007). This new emphasis on products introduces a common language, allowing verifying the attainment of qualifications according to their content and the competences that provide proof of the occupational profile. It does not concentrate on the methods and processes of acquisition.

Institutional discourse in Spain presents the procedure for validation and accreditation as a certification proposal that allows for a rigorous approach to the inequalities associated with the processes of regulated training. We agree with the institutional discourse when it highlights that the procedure is intended to mitigate the effect of high unemployment rates, the high percentage of early school leaving, the increasingly precarious training and labour transitions, as well as the large number of male and female workers without certified qualifications (Chisvert-Tarazona et al. 2015). However, if the discourse that is introduced in the norm – and in which social equity is claimed – is not transferred to the practice of the procedure, people at risk of exclusion may find this to be a new obstacle.

This chapter aims to provide a comprehensive view on the accreditation procedures and how their promotion has introduced a new dimension in the VET system in Spain. For this purpose, the implementation processes of Royal Decree 1224/2009 (BOE 2009) are detailed in depth, as the regulation that legislates the recognition of professional competences acquired through non-formal means of education and work experience, by pointing out the pros and cons of the process.

Due to the structure of the chapter, the second section describes each of the phases in the Spanish procedure for evaluation and accreditation of competences and discusses its implementation. The third section will bring to the fore three good practices in the procedure and the fourth section concludes by giving the author’s view on the current accreditation system.

4.2 Debates on the Accreditation System in Spain: Description and Main Features

In Spain, the process for the validation and accreditation of non-formal and informal learning is marked by the recent development of vocational training in the non-formal system. It benefits from the European institutional discourse being transferred entirely to the Spanish educational and labour administration. The *National Institute*

of *Qualifications* (INCUAL)¹ thus defines as a relevant action something benefitting the people by raising the qualification level, extending the training options, officially recognising skills and improving job-finding and mobility. Some of the benefits for business referred to by this Institute were facilitating processes for selecting and promoting their staff, extending their preparation and motivation and improving the quality level of production processes. A validation and accreditation procedure complying with the “(...) principle of equal opportunities between women and men and the principle of equal treatment and non-discrimination shall be applied transversally to all activities” (Cedefop 2016, p. 2).

Organic Act 5/2002 of 19 June, on Qualifications and Vocational Training (BOE 2002) was promulgated for the purpose of creating the National System of Professional Qualifications. It is the only education law that builds on social consultation and in which there is consensus for approval between the government and the opposition. Article 8 was expressly devoted to the recognition, evaluation, accreditation and registration of professional qualifications. This work was entrusted to the Government after consulting the General Council of Vocational Training. This regulation brings the legitimacy of consensus, of the political pact, to the procedure. Its development has however frequently been delayed by the misgivings of the participating agents, as well as limited by the dearth of resources allocated to its implementation along with the lack of interest of regional government.

The approval of Royal Decree 1224/2009 (BOE 2009) determines the exceptional procedure in force in the field of education and employment concerning the evaluation and accreditation of professional competences acquired by means of work experience or non-formal training pathways. Central government is responsible for managing the national validation system through the Ministry of Education and the Ministry of Employment.

This procedure is consolidated and revitalised in Law 30/2015 (BOE 2015), which regulates Vocational Training for Employment, as its objectives include the promotion of the accreditation of professional skills attained by means of non-formal training or labour experience.

A description of the validation and accreditation procedure in the Spanish context is now provided. We present the phases in the procedure for the validation and accreditation of competences in Spain: processing, counselling, evaluation, accreditation and registration. We end up by discussing this procedure, where we try to point out a broad gap between the rule and the practice which is heightening the difficulties for its implementation.

4.2.1 Processing Phase: Access to the System

The government education and employment departments implement the calls for access to the procedure for validation and accreditation of competences. The Administration that has promoted the development of calls to a greater extent is

¹Available at INCUAL: incual.mecd.es

the Education Ministry, with 64.21% of the qualifications that were convened until 2016. Since the beginning of the procedure both administrations have made the regional calls together only in regions such as the Basque Country or the Canary Islands.

The regional calls made since 2009 reveal an unequal participation of the autonomous communities. If 2011 was the year in which the calls were generalised in most of the communities, this trend was paralysed in 2012 when the implementation of calls was limited to six territories due to austerity measures. In spite of this, as of 2013, there has been a recovery with an increasing number of qualifications called for each year. Currently, except for the Community of Madrid and Ceuta and Melilla, most of the regions have opened calls on a regular basis and the volume of qualifications available to be accredited for the population has tended to be systematically extended every year. Especially prominent is the case of Galicia, specifically handled in two chapters of this publication. In practice, the new nature of this procedure has enabled authorities to assign scant resources and delay its implementation. As the present Director of the INCUAL put this, in many cases, the resources were available in the autonomous communities, but no use was made of them (Carballo 2018). The budget allocated in Spain in 2014 came to 5,605,000 € (Cedefop 2016), an unquestionably relevant sum. The strategy used by different autonomous communities has been to keep the procedure “on the shelf”, that is, not to disclose its existence. In fact, the few calls have made this effort flag. This makes us doubt as to the existence of a genuine wish to accredit the professional competences acquired in non-formal and informal education contexts, perhaps due to the distrust of certain regional governments on the political advantages of a procedure which could give rise to union claims from workers. We could come up against the recognition of professional skills by the Ministry of Education and the Ministry of Employment, and the lack of recognition by the companies in which such competences are employed.

These regional public calls may be accessed by people who meet a set of conditions relating to nationality and minimum age, as well as proof of work experience and/or related professional training. The number of years of professional experience and hours of training that will allow the enrolment option is also stipulated according to the level of qualification. When consulting the application forms, the competences that can be accredited in Spain require evidence in the learning contexts that the norm has considered suitable: accreditation of years of working experience and/or certification of vocational training performed in non-formal contexts are requested. Access to the system thus involves limitations that could bypass professional skills obtained in other environments. There are contexts that can only be included exceptionally. This is the case of irregular work, meaning productive activities that infringe tax or labour legislation of the Ministry of Employment in Spain; as well as of unpaid work, which fits into an informal economy that does not pass through the market filter. The norm acknowledges these facts when it stipulates that people over 25 who do not have documentary justification may present some “proof admitted in fact” of their work experience or non-formal learning by means of a provisional registration. The insufficient number of places in the calls

nevertheless hinders the admission of professional and training records without plausible evidence. Most calls have a limited number of vacancies, and this is the reason why many applicants who meet the requirements might not proceed to the next phase of the procedure. This manner of implementing the procedure undermines the philosophy involved in its design: filters are established hindering access to accreditation for people who could have the competences to be validated. And it is precisely the most vulnerable groups who undergo most difficulties in compiling prior accreditation. While calls with a limited number of applications continue to be implemented this will mean upholding a system which does not accredit the persons with professional competences, but those who as well as having these can vouch for this to a greater extent, acting as a competitive system.

Another relevant question is to consider what qualifications are likely to appear in the calls at the autonomous communities. Only the professional qualifications available in the National Catalogue of Professional Qualifications (CNCP)² will be eligible for accreditation, and these qualifications respond to a greater extent to competency levels corresponding to medium qualification – and, to a lesser extent, low qualification – jobs. The difficulties in updating this catalogue are also to be highlighted, due to an excessive protectionism of the formal VET degrees and due to the lack of resources available in the INCUAL, the Institute that designs the qualifications.

On the other hand, the scant resources allocated to the procedure have required the introduction of criteria aimed at choosing which qualifications should be offered in future calls. One of the criteria was to prioritise the call for professional qualifications/certificates corresponding to regulated professions, in which the accreditation and certification of the qualification is urgent to guarantee the maintenance of the job. Proof of this is that up to 2016, a total of 92,591 people have obtained accreditation in regulated sectors as Health and Sociocultural and Community Services (Observal 2016), representing 71% of the accreditations. Some examples of these qualifications are social healthcare for persons at home or healthcare transport.

Having said that, participants partially finance the procedure by paying fees that are stipulated by each autonomous community. These fees may seem token sums, affordable by a good deal of people. In some regions, they include measures to facilitate access by groups with no resources such as reduction or elimination of fees for the unemployed or those with very low income. They are nevertheless measures that have not become widespread in all regions.

After detailing the procedure, this will now be examined from the perspective of the applicant, who must meet certain conditions: for the qualification to be available in the CNCP, for the accreditation to be convened, for this regional call to be made available, for there to be sufficient number of places to respond to all the applications, and for the accreditations to be considered suitable in respect of the context in which they were obtained. These issues refer to administrative management and the availability of resources and can become the main obstacle to accessing a validation and accreditation of skills in non-formal and informal education areas.

²CNCP available at <http://incual.mecd.es/web/extranet/cualificaciones>

It is important to be aware that failure to admit them for processing does not necessarily mean that participants do not have professional skills. In many cases, the reason for this non-admission is that there are not enough resources to keep all the applicants who fit into the profile in the procedure. This is a very serious matter, since a procedure that was created with the intention of fostering social justice becomes in practice a procedure accrediting a few and discrediting others who deserve certification due to limitations of technical-administrative management and availability of financing.

Faced with these administrative management problems perhaps we should ask ourselves: Are administrative issues forcing the evaluation of skills into the background? At what point does the evaluation of learning begin to be a concern in the system? No doubt, too late. The answer to this question should nonetheless be “from the beginning”. The participant in the system must know what he or she can expect from the system and how and on what they are going to evaluate him or her. In the processing phase, evaluation should be a matter of concern for the professional guidance service. This service is included in regulations as optional and prior to the start of the procedure. At present, the offer of professional guidance or not depends on the willingness and possibilities of the institutions in which the evaluation, validation and accreditation of competences are implemented. There is little availability of professionals whose job is to advise those people who request it, about the nature and phases of the procedure, the conditions of access, and their rights and obligations; as well as to pilot the first stages of analysis of the feasibility of accreditation. At the beginning of the system’s design, there was an important debate about the obligatory nature – or not – of this service to allow people’s access to the procedure. Finally, the service was reduced to an optional instrument of support. Including guidance as an open and permanent service would have become a good instrument to make the system of validation and accreditation of competences known among the population and guarantee proximity to citizens, humanising the system.

In spite of all this, it is to be emphasised that the system has invested in the processing phase, improving and speeding it up. The majority of the autonomous communities have incorporated software and hardware to make this possible. This phase can nevertheless only be considered successful when each person wishing to prove their competences can do so within a reasonable time and within their territorial scope. Current reality is far from this claim. In spite of everything, the lack of awareness of the procedure by the population and companies has led to slow growth, perhaps excessively slow and lacking any great expectations on the part of the population and the companies. Its scant dissemination has especially harmed the most vulnerable groups, who hardly become aware of the procedure and access requirements.

4.2.2 *Counselling*

Once people have accessed the system, counselling is offered. In this phase, the advisors guide and support the applicants with the screen applications in the regional calls to enable the final completion of the *competence folder*.³ These tasks are carried out through interviews over a period of several months. Its duration depends on the qualification and the contributions of the person who is evaluated as well as on the evaluation culture of the region and institution in which the procedure is performed. If the professional guidance were maintained during the processing phase, the work of the advisors would undoubtedly benefit from greater agility and the improvement in the quality of the contributions.

The profile of the person performing the guidance requires extensive knowledge about the qualification that is subject to evaluation so that the degree is consistent with the professional competences required. Advisors' training is essential to be able to access a position in the system. It is aimed at completing the advisors' knowledge in the area of counselling and guidance even if its content and duration are determined in each autonomous community.

Although advisors cannot also act as evaluators in the same call for validation, they have an indirect participation in the evaluation. This participation is specified in a written report addressed to the evaluation committee. If the report is positive, it will be transferred to the evaluation committee together with the documentation provided. If the report is negative, training will be recommended for the candidate, who will ultimately decide whether or not to continue in the process.

In this report, the advisor presents the skills of the candidate according to each unit of competence requested and assesses their suitability to participate in the process and the professional skills that they consider sufficiently justified. It is a non-binding report. However, this evaluation exercise limits the space of trust generated with the applicant for accreditation, especially when there is no guidance service in the procedure. This advice is highly contaminated with evaluation functions and in many regions lacks sufficient training.

4.2.3 *Evaluation*

The evaluation and accreditation take the CNCP as curricular reference.

Cedefop (2016) notes that in Spain the portfolio is the procedure most used by applicants to provide evidence of their work experience and formal or non-formal training. The portfolio explicitly appears in the procedure through the preparation of a folder of competences that is attached to the request and that is to be improved

³The procedure introduces in its rules that the competence folder must include self-assessment of competences; personal, professional and training history; as well as the evidence corroborating this.

throughout the process. Observation in the workplace, simulations, standardised tests of professional competence or the professional interview are other methods proposed by the system.

The evaluation committee analyses the report prepared by the advisor and the documentation provided in the folder of competences. This committee is ready to introduce other methods according to the nature of the unit of competence, the characteristics of the applicant and the evaluation criteria included in the evidence guides. Although it originated with the aim of benefiting adaptation to diversity, including this power in the evaluation exercise has inevitably brought in distortions by juxtaposing realities such as the scarcity of resources or the necessary transparency of the evaluation exercise. Again, practice has corrupted theory.

The Procedure Handbook published by INCUAL (2010) is the main tool that supports the Evaluation Committee in the validation procedure. This document consists of a set of guidelines for the candidate, the advisor and the evaluator; it also incorporates self-questionnaires about the units of competence and the evidence guides related to each qualification.

Two evaluative points are evidenced before issuing a final opinion: (1) one aimed at determining the value of evidence of indirect competence; and (2) one intended to continue expanding the folder of competences. It is worth noticing that it is not essential for a candidate's request to go through both. If the committee considers that the candidate's contributions are far from the criteria of the evaluation, it will not require new evidence. Non-admission can therefore be based on a value judgement that exclusively involves evidence provided in the processing and counselling phases. In order to obtain a positive opinion, nevertheless, there is need for a comparison and provision of new evidence. It is hard to understand the reasons why a file that has reached this stage could be questioned without trying to incorporate new evidence to ensure the adequacy of rejection or the negative evaluation report. The proposal to go further in the evaluation of competences when little evidence is available is reasonable in an evaluation process intended to reveal non-formal and informal learning. It is true that Eraut et al. (1996) alert of the dangers of allocating excessive resources to evaluation. The dismissal of evaluative instruments that allow access to direct evidence when the evidence shown is poor is however surprising.

In fact, the certification of competences obtained to date shows that the evaluation procedure has not been put to the test. It was made clear in the section on the processing phase that in most cases the system convenes a smaller volume of vacancies than the number of people who meet the access profile. This situation has minimised the debate on competence assessment.

4.2.4 Accreditation and Registration Phase

From 2007 to 2016, a total number of 130,394 people achieved full or partial accreditation of a qualification in Spain (Observal 2016). In the period from 2014 to 2016, the number of people involved in the validation and accreditation of

competence processes was around 25,000 each year (Cedefop 2016). This was similar to previous years. Nonetheless, these are very low figures compared with the intention to generalise the certification of qualifications and even lower if one takes into account the need to significantly raise average qualifications in Spain, to respond to the requirements of Europe 2020 and an increasingly demanding job market. According to data from the third quarter of the Active Population Survey in Spain, conducted by the National Institute of Statistics (INE), the people who achieved full or partial accreditation represent 0.57% of the active population (INE 2017). The figures for the Active Population Survey for the second quarter of 2018 show that 63.32% of the population over 16 years of age do not have professionalising training, which vouches for the weakness of the implementation of this policy.

The procedure of validation and accreditation of professional qualifications obtained in non-formal or informal environments only allows access to the Professional Certificate.

As the final phase of the procedure, this certification and accreditation involve differences between formal and informal systems. It evidences the distance between academic learning and learning acquired by means of professional experience or Vocational Training for Employment. In order to obtain a Technician or Higher Technician Degree, the citizen will have to comply with the prerequisites to access the corresponding formal VET, set forth in Organic Education Act 2/2006 (BOE 2006). Non-compliance with these requirements leads to accreditation by means of the professional certificate. Table 4.1 displays the similarities and differences between the two certification formulas.

Table 4.1 Similarities and differences between the vocational training certificate (FP) and the professional certificate

Dimension	Vocational training degree	Professional certificate
Professional scope	The professional field that includes training for several professional qualifications belonging to a professional family	The professional profile that groups training with regard to a qualification
What it is	An instrument to accredit the qualification and competences that the CNCP has as reference	
Administration	Educational	Employment
How it is structured	Regulated professional education. It is structured in three levels, basic vocational training, intermediate and higher level, depending on the professional qualification achieved	Vocational training for employment
How it is obtained	By passing the different subjects	Successfully completing the training modules or through the procedure for the evaluation and accreditation of competences acquired by means of work experience or non-formal training pathways

Our own work

It is again the education administration that has better conditions to opt for the certification. Regulations nevertheless outline real options to move from the Professional Certificate to the Vocational Training qualification. The system allows a partial accreditation from the minimum unit with significance in employment: the unit of competence. If you have all the units of competence that make up a Professional Certificate, you will obtain your certification directly. The suspiciousness of non-formal and informal learning is clear. This learning may be certified, but obtaining the degree requires having the compulsory formal education certified. It is true that some bridges have been built to structure both training systems, but it is surprising that the system for validating and accrediting competences has not considered evaluating the basic competences proper to compulsory formal education.

Practice limits the implementation of the rule. It is time to ask whether the rule is able to include within its scope some of the significant practices experimentally developed over the last few years. These could lead us to questioning the current sense of the system for validating and accrediting competences. One might wonder what is worth being evaluated through this system, who is subject to the procedure and whether this leadership could be shared by other agents with little responsibility under the present regulation. These issues will be dealt with in the following section.

4.3 Discussing the Procedure: Conceptual and Practical Questions

If we ask about what is evaluated in the Spanish procedure for validation and accreditation of competences, the regulation makes it quite clear: professional competences. Before the approval of the norm, Bernad and Marhuenda (2008) already considered that the certification, validation and accreditation of learning outcomes in the labour market would be less accessible to people of a lower social status, those who are more vulnerable, less educated and with less formal accreditation. There is a need to create plausible itineraries for qualifications so that the individuals who do not fit into the traditional formal system can find a place in the qualification system of the country.

In Spain, the procedure for validating and accrediting competences could mitigate the effects of the high percentage of school failure and school dropout currently being found if this included the certification of basic competences usually acquired in compulsory primary and secondary education. It is important to remember that these competences are the substrate of professional competences. Portugal's validation and accreditation system could act as background, since a decade ago this country also had a low level of school certification and of professional qualification. From 2006 to 2011, the Portuguese system prioritised the evaluation of basic competences, which allowed approximately 425,000 completed school certification processes (Capucha 2014). This shows that adult education was a public policy able to

foster a great social movement in search of qualifications. The fact that less educated adults were in Portugal the ones who became more involved in these educational and training practices reveals and is materialised as a reduction of inequalities and social cohesion as the adult population had access to lifelong learning processes (Abrantes and Anibal 2014).

Furthermore, if we ask who is subject to this procedure, we can see that the discourse of making visible what is taught and learned throughout life leads to a clear “exposure” of the person submitting to evaluation. Duvekot (2014) alerts about a deep and invisible mechanism that increases the role of individuals in their acquisition of knowledge, skills and abilities and in their learning process, proportionally reducing the responsibility of the state: a state which has allowed the creation of a system responding to business logic instead of more social policies which would guarantee the widespread implementation of the system and were sensitive to access of the groups with greatest difficulties. Such policies would compulsorily include the professional guidance service in the system as an aspect intended to make the device comprehensible, to humanise this and ensure outreach to the population.

The role of social agents is also relevant. Business and trade union organisations, present on the General Council of Vocational Training, have taken part in designing the norm from different logical standpoints. Trade union organisations considered that if the procedure was consolidated in all areas, levels of qualification and sectors, this would enable making the professional competences available visible and would improve its regulation in collective agreements (UGT-PV 2015). These are the parties who have spread the procedure most. Business employers’ associations nevertheless had doubts about its implementation precisely for the same reason put forward by the trade unions. This circumstance has not benefited the participation of companies, practically absent from the procedure.

I would like to explain two business practices implementing measures in the benefit of improvements to the system: one of these, the *Federico Ozanam Foundation*, joins the procedure by offering its workers professional guidance for facilitating the certification of their competences; the other, Mercadona S.A., an organisation which politically forces access of its workers to the system in exchange for co-financing the procedure.

The case of the *Federico Ozanam Foundation*,⁴ a non-profit organisation that belongs to the social economy, vindicates the access of vulnerable groups to the system and exemplifies how an enterprise can participate in the procedure. In 2012, it had around 80 geriatric nursing assistants that required accreditation in the “Social and health care for dependents in social institutions” qualification, if they wanted to keep their job. The staff of the employment department had participated in training

⁴I came to know this experience, thanks to my participation in a work group coordinated by the Spanish Federations of third sector companies Faedei and Aeres. This group had the purpose to make accreditation procedures accessible to staff in Work Integration Companies. It was within this framework that, with the support of the research project funded by the Spanish Government “Educational processes, accompaniment, qualification and personal development in work integration companies: innovation in social inclusion through employment” (ref. EDU2013-45919-R), a handbook was written towards this aim (Guillera-Marco and Chisvert-Tarazona 2018).

conducted by the Agency of Professional Qualifications of Aragon, so they had sufficient knowledge about the system of validation and accreditation of competences. They carried out a process of supporting, counselling and guidance for their workers for months. They helped to understand the procedure, gave advice on the collection of the documents needed and prepared them for evaluation tests (normally an interview). This practice proves that the validation of prior learning should be regarded as a process rather than a result (Diedrich 2013). The results of the process were excellent. More than 90% of the workforce that required accreditation obtained it through this procedure, without the need to carry out vocational training. The workforce provided evidence of their previous professional and training experience. In parallel, some people responsible for the elderly were accredited as counsellors and evaluators, expanding their interface with the validation and accreditation system. This experience also reverts to the job counselling service offered by the institution, which transfers the opportunity for the users to be accredited for the competences that they attained in non-formal and informal learning contexts.

The case of *Mercadona S.A.*⁵ also provides proof of the business initiative in the procedure. This organisation valued the accreditation of the certification of qualifications among its employees and decided to participate in the procedure. For this purpose, the company negotiated a call with the Department of Education and Employment, exclusively intended for the company's staff. The proposal aimed to enable the employees of this company to complete the procedure of evaluation and accreditation of competences. The approval of the application in 2012 opened up the possibility to certify the professional experience of the company's employees lacking an accredited professional qualification. Already in that year, this initiative benefited 50 professionals from the food chain that were able to accredit their qualification in Assembly and Maintenance of Refrigeration Installations. This company participated in the financing of the procedure, providing resources for the training of counsellors and evaluators in this qualification. It was the first initiative led by a company to benefit the accreditation of its workers. This experience has subsequently been reproduced by this and other companies.

These business practices, not very common in the Spanish setting, could be extended if regional authorities were to favour them in their tax policies. Some caution should nevertheless be used if measures and systems to be led by companies are promoted. Some authors consider that the instruments associated with learning will soon define and control assessment practices and curriculum (Leney et al. 2008; Guo and Shan 2013).

⁵Mercadona is a supermarket company with Spanish capital and is based in Valencia. It works in the food, personal hygiene, home care and pet care sectors. Currently, the company can be found in 50 provinces of the 17 autonomous communities with more than 1600 supermarkets.

4.4 Discussion of the Competence Accreditation System in Spain

In Spain, the procedure of validation and accreditation of competences was expected to play an important role in increasing transparency and mobility in the labour market, as well as in fostering motivation for lifelong learning. This system nevertheless still requires updates and adaptation to the needs of society and of the labour market (Carro 2015). It is important to be aware of the challenges ahead, which are connected with an understanding of the accreditation process as an inclusion space in a way similar to the one proposed by UNESCO.

The spatial decentralisation of the systems and the ambiguity of state regulations have created major differences in the development of the norm in each different region. These circumstances reveal different political willingness in each community in the availability and use of resources, in the criteria for choice of the qualifications convened, in the weight of the different stakeholders in the procedure or even in the duration and content of the programme for training advisors and evaluators. The coordination and arrangement of common objectives on the different levels of education planning – local and county, autonomous community and regional, national and supra-national – is of vital importance (Rego-Agraso et al. 2017), something which could doubtlessly be improved in the procedure.

Another drawback to be settled is to guarantee the transition between the system for validation and accreditation of competences and the subsystems of professional training. The good results in pilot experiences prior to the implementation of the system in such communities as the Canary Islands (Cabrera and Córdoba 2011) have not been consolidated. Bridges become blurred in practice. The little stability of the structures of both systems does not guarantee the availability of professional training, especially of Professional Training for Employment, or of validation and accreditation of a qualification when this is requested by the population.

This procedure of validation and accreditation requires the ongoing expansion of its curricular references. It is important to include new qualifications and update the ones that are available. We point out two areas of great benefit for the most vulnerable groups: (1) the introduction of basic competences, which are of special interest to those people without certification in mandatory regulated training, and (2) the introduction of a larger number of professional qualifications on the first level of qualification, unquestionably the most neglected one in the CNCP (Chisvert-Tarazona et al. 2015). A third area pending in need of development is that of qualification levels IV and V, in which access from non-formal or informal spaces is undoubtedly more complex but whose incorporation could bring wide recognition to these learning environments (Tejada 2007).

Another challenge for the procedure is to generalise the system, making this accessible to the whole population with basic and professional competences in its development and practical application. In order to produce a shift in the current situation, there is a need to extend the procedure calls until they match the requests in each qualification and territory and to disseminate the procedure and bring it closer

to the citizens by means of stable professional guidance services that invest in relations of proximity.

But the administrative management of the procedure should not force into the background conceptual and theoretical challenges such as the analysis of the evaluation of learning. Its summative, finalistic, commercialised sense, where the accreditation and certification have an instrumental value as merchandise to be accumulated in order to improve the credentials in the labour market (Bernad and Marhuenda 2008), should be turned into a space for reflection of the professional project and life of the individuals who access the procedure.

It is essential to be aware that the exercise of individual responsibility does not release the state or companies from their responsibility. If we focus on the learning outcomes and ignore the teaching and training processes, it is easy to transfer the responsibility for their learning to each individual. This neoliberal positioning has to be reformulated, keeping the state as guarantor of social justice in the access and benefits of the procedure, adding to the transitions required to keep moving forward.

Perhaps one should take into consideration that above all this accreditation system is a process of social construction that requires concentration and agreement, with an attentive insight in the contextual aspects. This would mean trying to tip the balance towards inclusion by humanising the process. This nevertheless contrasts with the scant conviction of the Spanish labour and education administration in the implementation of the processes of accreditation of qualifications. The insufficient resources allocated to the calls, the dissemination of the procedure, the training of professionals for its development and the update of the CNCP are proof of this.

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