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Hendrickje Catriona WINDISCH

(University of Oxford)

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**Berufliche Bildung in Europa – 20 Jahre nach Lissabon und am Ende von ET 2020.
Entwicklungen und Herausforderungen zwischen supranationalen Strategien und nationalen Traditionen.**

Hrsg. v. **Karin Büchter, Karl Wilbers, Hubert Ertl, Dietmar Frommberger & Franz Gramlinger**

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HENDRICKJE CATRIONA WINDISCH (University of Oxford)

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Abstract

The influx of asylum seekers into the European Union in 2015-2016 has turned the recognition of non-formal and informal learning (NFIL) into an integration priority. As refugees should be able to build on their existing skills and knowledge, such skills recognition is thought to facilitate their labour market integration. Therefore, for Germany and many other host countries, improving the accessibility and suitability of such mechanisms to refugees has become an integration challenge. This article explores why many European countries including Germany have been slow to address the issue systematically. It sheds light on the historical emergence of skills recognition at the EU level and the current implementation of skills recognition across European countries before zooming in on the situation of validation in Germany.

Schlüsselwörter: *Skills recognition/validation, migrant influx 2015-2016, non-formal and informal learning, vocational skills, Germany*

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1   Introduction

The influx of asylum seekers into the European Union (EU) in 2015-2016 has turned the recognition, or in EU terminology validation, of non-formal and informal learning (NFIL) into an integration priority. As refugees should be able to build on their existing skills and knowledge, such skills recognition is thought to facilitate their labour market integration (European Commission et al. 2016; OECD 2017a). Therefore, for Germany and many other host countries, improving the accessibility and suitability of such mechanisms to refugees has become an integration challenge (OECD 2017b). Why have many European countries including Germany been slow to address the issue systematically? The article seeks to explain this by discussing the historical emergence of skills recognition at the EU level and its current implementation status across European countries before zooming in on the situation in Germany. It draws on cross-country data collated by the European Centre for the Development of Vocational Training (CEDEFOP) and findings from the author's doctoral research project that explored the recognition of refugees' non-formally and informally acquired vocational skills for use in Germany's labour market (Windisch 2020). The latter findings were gained through analysis of data collected during the first six months of 2018 in Baden-Württemberg by means of interviews with refugees and stakeholders of skills recognition arrangements, observations

of advisory sessions for people seeking formal recognition of their foreign vocational or professional qualifications and skills and policy documents.

2   The emergence of skills recognition at the EU level

This section illustrates that refugees as potential users of skills recognition arrangements have only gained the attention of European policymakers since the migrant inflow in 2015-2016. Many arrangements for the recognition originated prior to this, in a European policy debate which was more concerned about the plight of lowly qualified EU workers than refugees.

Skills recognition has come to be seen as a promoter of lifelong learning and better matching between skills and jobs. However, its integration potential for third-country migrants has not played any major role in its development in Europe. In 2000, *the Memorandum on Lifelong Learning* by the European Commission emphasised the need to 'significantly improve the ways in which learning participation and outcomes are understood and appreciated, particularly non-formal and informal learning' (European Commission 2000, 4). The 2004 *Common European Principles on Identifying and Validating Non-formal and Informal Learning* provided European countries with the first guidance for the development of validation mechanisms that would be comparable across borders (Council of the EU 2004). Moreover, in 2004, the first edition of the *European Inventory on Validation of Non-formal and Informal Learning* was published to share insights into country practices. It has since been updated six times (2005, 2008, 2010, 2014, 2016 and 2018). The latest 2018 version covers 36 countries of which most have taken part in the EU 2020 Cooperation Process, the EU's ten-year jobs and growth strategy until 2020 (CEDEFOP 2020) (the 27 EU member states, the four countries of the European Free Trade Association, the United Kingdom (UK), Kosovo, Montenegro, North Macedonia and Turkey).

Also in 2004, in the context of the *Education and Training Strategy 2010*, the EU introduced learning outcomes as an underpinning principle for European cooperation and reform in national education and training systems. This shift away from learning inputs to a focus on outcomes has proved crucial in seeking to attribute value to all learning, irrespective of how it has been acquired. The subsequent adoption of the European Qualifications Framework in 2008 triggered the introduction of National Qualification Frameworks (NQFs) based on learning outcomes, which could help clarify the role of skills recognition measures in national qualification systems (CEDEFOP 2016a). In NQFs, countries can promote NFIL as an acceptable route to obtaining formal qualifications and better labour market outcomes. The German NQF (DQR) was launched in 2013 and discussions on how to reference the outcomes of NFIL to the DQR are still ongoing, as a possible procedure and criteria for referencing are being tested in a pilot project (Ball 2019).

In 2009, the *European Guidelines for validating non-formal and informal learning* were released, with the objectives of comparability and transparency across sectors and countries, increased mobility, competitiveness and lifelong learning (CEDEFOP 2009, 2015). The 2009 and 2015 editions of the guidelines set out the four phases of validation, from identifying relevant experiences, documenting and assessing those, to the delivery of a partial or full qualifi-

cation. Additionally, they summarised insights into validation practices at European, national and sectoral levels and highlighted the critical choices to be made by stakeholders at different stages of the process (Ibid).

In 2012, this trajectory resulted in the *Recommendation on the validation of non-formal and informal learning* (Council of the EU 2012) which urged member states to have mechanisms in place by 2018 to enable individuals to have their NFIL validated and obtain a full or partial qualification. The EU, for the first time, set a time horizon for action and established a clear correlation between the availability of recognition procedures and an increase in the employability and learning motivation of unqualified workers and socially disadvantaged persons (Gaylor et al. 2015). Both of these aspects are discussed in the next section that explores the current implementation of validation mechanisms in Europe.

3 Uneven implementation of skills recognition across European countries, sectors and users

Due to a focus on low-qualified nationals, until the migrant influx in 2015-2016, few European countries had taken the needs of users with a migrant background in the design of arrangements into account. Many still lack scaled validation mechanisms for refugees. This is demonstrated below through surveying the *European Inventory of the Validation of NFIL* (here referred to as *European Inventory*) regularly conducted by CEDEFOP.

The aforementioned 2018 deadline by the EU Council recommendation aimed to stimulate EU countries into taking corrective actions. However, according to the latest updates of the *European Inventory* dating from 2014, 2016 and 2018, member states have only gradually placed skills recognition higher on their policy agenda and implementation has been uneven across countries, sectors and most notably user groups, including migrants and refugees (European Commission/CEDEFOP/ICF International 2014; CEDEFOP 2017; CEDEFOP, European Commission/ICF 2019).

According to the 2016 *European Inventory* (CEDEFOP 2017), some countries were striving for comprehensive national validation arrangements, while others preferred sector-specific approaches. However, it remains unclear which type of approach encourages broader participation. Eight countries (Denmark, Finland, France, Italy, Norway, Poland, Romania and Spain) have already set up national arrangements encompassing all sectors and thirteen countries are in the process of developing such arrangements (Austria, Flemish Belgium, Croatia, Cyprus, Estonia, Iceland, Ireland, Latvia, Malta, the Netherlands, Portugal, Slovenia and Turkey). Germany belongs to the fourteen countries which have sector-specific approaches, which also includes French Belgium, Bulgaria, the Czech Republic, Greece, Lichtenstein, Luxembourg, Slovakia, Sweden, Switzerland, and all four UK countries. It also falls into the group of countries without national coordination of validation arrangements. This contrasts with countries such as France, where the Ministry of Labour, Employment and Vocational Training coordinates the national validation framework, and with countries with combined national and regional coordination mechanisms, such as Spain and Switzerland, both with regional

governance structures, and Denmark and Norway, both decentralised countries with autonomous training providers. The 2016 *European Inventory* observed that many validation strategies were only in their early implementation stages and more needed to be done regarding resourcing and staffing (CEDEFOP 2017). Meanwhile, the 2018 updated *European Inventory* (CEDEFOP/European Commission/ICF 2019) notes that in all 36 countries, validation arrangements are now available in at least one broad area (either in education and training or the labour market or the third sector which comprises charities, social enterprise and voluntary groups) and that the main challenges for the future would be to build on existing good practices and to improve monitoring and evaluation mechanisms.

The formal education and training system has remained the main developer of validation schemes, while validation initiatives in the labour market are increasing but still less common. Validation in education and training is mostly used to gain either credits towards qualifications or access to education programmes or exemptions from parts of courses and less so to obtain a partial or full qualification. In the labour market contexts of many European countries, validation can now lead to a formal qualification (CEDEFOP/European Commission/ICF 2019). Compared to other education subsectors, those institutions and providers closest to the labour market, including initial and continuing vocational education and training, have provided validation more often and have been prioritised for public funding (CEDEFOP 2017). As such, it is not surprising that the two most commonly reported rationales for funding prioritisation relate to the labour market, namely 'reducing unemployment' and 'improving the match between people's skills and jobs' (CEDEFOP 2017, 37).

According to the 2018 *European Inventory* (CEDEFOP/European Commission/ICF 2019), despite improved data collection and monitoring procedures of the use of validation, data on specific aspects of validation, such as participation, type of outcome, user characteristics, success rate and length of procedure, remains limited. Overall, the upward trend in user numbers observed in 2016 seems to have continued into 2018. The available data suggests that most users are adult learners and that now more jobseekers and individuals at risk of unemployment than employed persons use validation. The use of validation is conditioned by countries' social priorities and regulations. For instance, the French validation system is mainly used by already highly qualified individuals, while over recent years, Portugal has geared its arrangements towards low-qualified citizens (Souto-Otero/Villalba-Garcia 2015).

The 2018 *European Inventory* echoes the previous findings regarding the use of validation by low-qualified and low-skilled persons. Although some of these people are using validation, more efforts are still required in reaching disadvantaged groups such as migrants and refugees. While the offer for migrants/refugees has increased in the surveyed countries since 2016, the 2018 data suggests that migrants and refugees are still not making much use of validation opportunities. In 2018, nearly half of all 39 surveyed European countries provided validation arrangements or project-based initiatives for migrants/refugees, up from just over a third of all countries in 2016 (CEDEFOP 2017; CEDEFOP/European Commission/ICF 2019). This is probably to do with the asylum seeker influx in 2015-2016. In Sweden, for example, where enhancing the assessment and recognition of immigrants' formal, non-formal and informal learning has long been a priority area, funding has been boosted in reaction to a sharp increase

in asylum seekers. Projects have focused on developing better validation tools for the public employment service to make skills acquired in other countries more visible and transparent to Swedish employers and to fast track skilled immigrants into professions with strong labour market demand (e.g. early years teachers, doctors, nurses and pharmacists) (Sandberg 2017). However, by 2018, only in four countries (Finland, Italy, Turkey and the Netherlands) migrants and refugees have become dominant validation users. One reason for this might be that many validation offers only target highly qualified/skilled newcomers and not the low qualified/skilled, unemployed or underemployed migrants/refugees. For instance, in Finland and the Netherlands systematic skills recognition happens largely in the higher education sector (CEDEFOP/European Commission/ICF 2019).

The migrant inflow of 2015-2016 has made the issue of skills recognition particularly pressing (CEDEFOP, 2016b). However, even prior to that Germany has faced challenges in the implementation of such skills recognition schemes, as illustrated below.

4 Skills recognition in Germany

This section zooms in on Germany, where it is shown that skills recognition is of particular relevance to refugees' successful labour market integration (Section 4.1). However, it is argued that despite its particular relevance there, formal skills recognition – the most formal form of skills assessment – is likely to prove difficult for refugees (Section 4.2).

4.1 The particular relevance of formal skills recognition in Germany

Formal skills recognition seems to be particularly relevant for refugees in Germany for at least two reasons. Firstly, many of the recently arrived refugees possess non-formally and informally acquired vocational skills (here referred to as NFIVOS) (4.1.1). Secondly, Germany has a highly regulated labour market that consists largely of relatively high-skilled occupations that require formal qualifications to enter (4.1.2).

4.1.1 *Many refugees possess non-formally and informally acquired vocational skills*

According to the IAB-BAMF-SOEP survey by the Research Institute of the Federal Employment Agency (IAB), the Federal Office for Migration and Refugees (BAMF) and the German Socio-Economic Panel (SOEP) (Babka von Gostomski et al. 2016), as many as 70 percent of the 4,800 surveyed refugees had gained work experience in their country of origin. At the same time, the survey revealed a polarisation in their educational attainment (BA 2018b, 6). At the lower end, 13 percent indicated no schooling and 12 percent attendance of only elementary school. In the middle, around 40 percent attended secondary education but without necessarily completing it, and between 20-30 percent hold a vocational qualification (Brücker 2016; Fendel/Romiti 2016; Neske 2017). At the upper end, around 17 percent participated in tertiary education (BA 2018b, 6). These findings among refugees of the most recent wave in 2015-2016 are similar to trends in qualification and skills levels observed in the representative 2013 IAB-SOEP Migration Sample of refugees and other migrants who had already lived in

Germany for an average of 16-18 years (Eisnecker et al. 2016). Of those refugees surveyed aged 24 years or older on arrival, 55 percent had no formal vocational qualification at all, and 20 percent held a university qualification. At the same time, 86 percent had already gained vocational experience – some 14 years on average (Liebau/Salikutluk 2016, 294–295). Consequently, these older and newer data suggest that many more refugees possess NFIVOS than foreign vocational credentials for which they could seek formal recognition. This is not surprising as the model of dual VET that links learning on the job and at vocational schools is not widespread outside Central and Northern Europe, and in refugees' countries of origin, many people acquire their job-relevant skills through NFIL on the job (Ibid).

4.1.2   *Germany has a highly regulated labour market*

Moreover, the regulated nature of Germany's labour market increases the potential benefits of refugees' formal skills recognition because holding a German qualification or proof of equivalency with the German reference qualification is advantageous for employment (Kis/Windisch 2018). For instance, research has revealed that the formal recognition of refugees' foreign vocational or professional qualifications can shorten their re-entry into the occupation they exercised in their country of origin by up to 17 months (Pfeffer-Hoffmann 2016, 46). The 2017 report on the Federal Recognition Act (*Anerkennungsgesetz des Bundes*) found in a survey of 812 users (including persons without a refugee background) that 72 percent believed to have achieved a better occupational position and earn around 40 percent more than before the formal recognition of their foreign vocational or professional qualifications (BMBF 2017, 1).

A large percentage of Germany's workforce falls within regulated occupations (Koumenta et al. 2014), which involve legal barriers to entry into these occupations, often with the objective of ensuring public safety and quality of service. For those with aspirations to practice a regulated occupation, there is thus a strong incentive to acquire a particular vocational or professional qualification either through formal skills recognition or education and training (Keep/James 2012). In Germany, occupational regulations apply to the category of professionals (e.g. medical doctors, engineers, architects and lawyers), to running a business in the crafts and trades sector and the industry and commerce sector, which requires a master craftsman title, and to around 42 vocational occupations that have to do with people's safety, including carers for the elderly, nurses, early years teachers and driving instructors (Wollnik 2012; BA 2019).

Even in unregulated occupations, where a formal qualification is not a legal precondition for working, formal skills recognition may be helpful in order to provide employers with a better understanding of one's skillset (Gaylor et al. 2015). This is the case for around 350 unregulated occupations within Germany's dual vocational education and training (VET) system (BMBF 2012). To avoid confusion, it is worth noting that, for instance, the occupation of the electronics technician is unregulated, while that of the master electronics technician is regulated. The reasoning behind this difference is that someone who completed an apprenticeship in the crafts and trades sector can only work as an employee and does thus not act fully independently. By contrast, holders of a master title in the crafts and trades have additionally attended postsec-

ondary VET and are thus entitled to run their own business, for which they bear full responsibility and for which they can employ others under their guidance (Wollnik 2012). As a result of Germany's well-established VET system, even without education requirements to practice in an unregulated VET occupation, employers may expect a German apprenticeship qualification or a confirmation of equivalency with the German reference qualification.

Moreover, findings by the Programme for the International Assessment of Adult Competencies Survey (PIAAC) (OECD, 2013; see also Footnote 11, p. 36) show that in Germany, an increase in non-certified vocational skills does not lead to improved employment opportunities for low-qualified persons. This contrasts, for example, with the UK where the unemployment rate decreases the higher the occupational skills regardless of low qualification attainment (see Figure 6 in Heisig/Solga 2014). A possible reason for this difference could be that, compared to the UK, employers in Germany rely more on candidates' formal qualifications than on work experience to infer their skills levels (Heisig/Solga 2014). Another factor could be the UK's less regulated labour market. Compared with the UK, Germany's labour law contains much stronger protection against individual and collective dismissals under either regular or temporary contracts. Consequently, German employers may be less likely than British employers to risk hiring unqualified workers (OECD.Stat. 2016).

4.2 Germany's slow implementation of skills recognition arrangements

While skills recognition is of particular relevance in the German context, Germany's implementation of the 2012 Council recommendation to develop NFIL validation procedures has lagged behind other countries and most German arrangements were set up without refugees in mind. Therefore, there is little literature on skills recognition in Germany, and hardly any on migrants in general, let alone on refugees' use of such arrangements. According to a 2015 comparative study by the Bertelsmann Foundation that rated validation of NFIL in nine European countries (Austria, Denmark, Finland, Germany, the Netherlands, Norway, Switzerland and the UK) (Bertelsmann Stiftung 2015; Gaylor et al. 2015), Germany together with the UK did worst in all five aspects of validation scrutinised, while Finland, France and Norway obtained the best scores. Given the limited literature on the topic, the following Sections 4.2.1-4.2.5 discuss the findings of the 2015 Bertelsmann study, best case practices drawn from the *European Inventory on Validation of NFIL*, and updates from the 2018 *European Inventory* country report on Germany (Ball 2019) and the author's 2020 study on the Recognition of refugees' NFIVOS for use in Germany's labour market (Windisch 2020). The sections reflect Germany's implementation of skills recognition in terms of its legal foundations, procedures and instruments, financing, institutionalisation, and support structures.

4.2.1   Legal foundations

Legal foundations are important in ensuring that validation results are binding and transferable. In 2015, the Bertelsmann study found Germany's legal foundations of validation arrangements wanting. It only gave it a C (from strong A to weak D) because statutory regulations were limited to certain procedures (Gaylor et al. 2015). The 2018 CEDEFOP country report (Ball 2019, 4) similarly observed that '[a] comprehensive system of recognition that defines uniform

procedure and includes a legal basis as well as regulations on financing services and counselling does not yet exist'. France, meanwhile, is an example of a national validation system. There has been a legal right to validation of NFIL, called *Validation des acquis de l'expérience* (VAE), for persons with at least three years of experience since 2002. Annually, around 25,000 persons obtain qualifications equivalent to those in formal education and training through validation (Michel/Looney 2015, 20). However, Ball (2019, 4) notes that a comprehensive validation system 'is a significant challenge due to the German federal structure'.

According to Windisch (2020), Germany could create a legal basis for the validation of NFIL similar to its 2012 Federal Recognition Act (*Anerkennungsgesetz des Bundes*), that is the 'Law to improve the assessment and recognition of professional and vocational education and training qualifications acquired abroad' (Bundesrepublik Deutschland, 2011). It covers over 600 occupations governed by federal law, which include the around 350 unregulated trades of the dual VET system, 100 regulated master craftsperson occupations, and around 40 nationally regulated professions, such as medical doctor and nurse (BMBF 2020). The entry into force of the Federal Recognition Act in 2012 and the subsequent alignment to it of the federal states' Recognition Acts (*Landesanerkennungsgesetze*) have brought about two major changes (IQ Netzwerk Baden-Württemberg 2019). For the first time, Germany started to offer assessment and recognition procedures for foreign vocational or professional qualifications accessible to all foreigners, not only EU migrants but also third-country nationals. Secondly, the Recognition Acts now for the first time also contain standardised criteria and a uniform procedure for the equivalency assessment of foreign vocational qualifications that relate to the around unregulated 350 training occupations of the dual VET system thanks to the introduction of the 'Vocational Qualifications Assessment Law' (*Berufsqualifikationsfeststellungsgesetz*, BQFG) into their first articles (BMBF 2020).

However, these legal developments took a long time, which suggests that the creation of a legal basis for NFIL validation may be equally slow. Germany's Recognition Acts are embedded in the European integration process that has brought about a series of multilateral agreements for the mutual recognition of vocational or professional qualifications, with the earliest dating back to the 1970s. The latest European legislation in this respect is Directive 2013/55/EU on the recognition of vocational or professional qualifications (European Parliament and Council 2005). In Germany, the 2007 study *Brain Waste* (Englmann/Müller 2007) sparked a public debate about better use of migrants' skills. Prior to 2007, there was no official data and little information on procedures for the recognition of foreign vocational or professional qualifications. The publication made the first comprehensive contribution to the topic and has become a standard reference. It pointed out shortcomings including the limited suitability of recognition measures for refugees. In 2007, Germany signed the 1997 Lisbon Recognition Convention, which, among other things, promoted the recognition of refugees' university degrees for work purposes. However, the 2007 National Action Plan for Recognition remained vague about the need to review a possible expansion of recognition procedures for so-called 'document-less' applicants, meaning those cases common among refugees in which documented evidence of qualifications is missing (KMK/BMBF 2007, 5). The subsequent policy debate paved the way for the 2012 Federal Recognition Act which addresses this issue through its 'other procedures'

(see Bundesrepublik Deutschland 2011, Article 1, §14). These procedures contain Germany's first statutory option for the recognition of NFIVOS, though only accessible for holders of foreign credentials (Berger/Lewalder/Schreiber 2014). In case candidates have insufficient written proof of their foreign vocational qualification or the competent authority identifies skills deficits compared to the German vocational reference qualification, they can draw on their NFIVOS to prove the required skills. Either they show documented evidence of their work experience and non-formal training; or they could undergo the skills analysis (*Qualifikationsanalyse*) which involves a customised NFIVOS assessment (e.g. specialist interviews and work samples) by the chambers (Ball 2019).

4.2.2   Procedures and instruments

Germany's procedures and instruments are also not yet firmly established. In its assessment, the 2015 Bertelsmann study gave Germany the lowest score D because its provision was found to be diverse and lacked standardisation and quality assurance (Gaylor et al. 2015). This impression was confirmed in the most recent *European Inventory* country report on Germany which found that 'validation in Germany can still be described as a colourful mosaic of local, regional, sectoral and national approaches' (Ball 2019, 4). Similarly, according to the 2020 study on refugees' use of skills recognition (Windisch 2020), there are various diagnostic skills assessment arrangements in place that are not standardised and do not lead to formal skills recognition. However, for validation arrangements to be visible, understood and sought after, they need to be permanent with standardised procedures that yield meaningful results. Denmark's two-stage model has transfer potential for Germany. Its legally regulated validation procedure of two stages makes it easier for groups unfamiliar with formal learning to enter training or work. Individuals' skills are documented in reference to existing qualifications on a certificate which can then be used as orientation either for further education and training or direct employment (Aagaard 2015).

Since 2015, Germany has sought to address the issue of standardisation of procedures and instruments with the ValiKom pilot project. With funding from Germany's Federal Ministry of Education and Research (BMBF), between 2015 and 2018, eight participating chambers of both sectors – industry and commerce (*Industrie- und Handelskammern*, IHKs) and crafts and trades (*Handwerkskammern*, HWKs) – explored the potential of a customised skills assessment similar to the skills analysis stipulated under the above-mentioned Federal Recognition Act, to formally recognise the NFIVOS of persons without vocational qualifications (Windisch, 2020). While ValiKom had been launched initially to address the need of low-qualified but skilled Germans for a formal recognition mechanism for NFIVOS, in response to the migrant influx in 2015 refugees were added to its target group. However, as a pilot project, ValiKom was not widely accessible for refugees and according to recent findings (Windisch 2020), refugees with limited German language skills would struggle to follow the language-heavy procedure.

4.2.3   Financing

Financing arrangements are a crucial aspect of validation arrangements as they influence their attractiveness and user groups. Across Europe, financing arrangements include national govern-

ment, company-based and private approaches, sometimes with combinations of these within a single country (Bertelsmann Stiftung 2015). Finland has a national state financing arrangement where the validation costs are covered by the Ministry of Education and Culture for candidates in work and the Ministry of Labour for unemployed persons (Karttunen 2015).

In the 2015 assessment by the Bertelsmann study, Germany only obtained a D for its financing of validation because participants were often required to pay out of their own pocket (Gaylor et al. 2015). The study suggested a mixed financing arrangement with income-dependent support (e.g. through the Federal Student Assistance Act (*Bundesausbildungsförderungsgesetz*, BAFöG) or training funds) and possibly also employers' contributions (e.g. through paid leave), as practiced in the Netherlands and France (Bertelsmann Stiftung 2015). According to the 2018 CEDEFOP report on Germany (Ball 2019, 18), while funding for validation can come from public authorities, the private sector and the third sector, in many cases, it still comes from individual candidates. As a result, the report identifies 'a need for further funding in order to support individuals seeking validation as well as institutions offering validation, information, advice and guidance' (Ibid).

Some positive German examples include public funding in the form of the recognition grant (*Anerkennungszuschuss*) in place since late 2016 to support candidates under the Recognition Act with up to EUR 600 and the free of charge skills assessment software MySkills that has been available for unemployed persons registered with an employment centre since its launch by the Federal Employment Agency in 2018. The freely available online self-assessment AiKomPass for people working in the metal and electronics industry is an example of a public-private validation tool. Its development between 2012 and 2015 was initially funded by Baden-Württemberg's Ministry of Finance and Economy but has since been maintained and updated by the AgenturQ, the agency for further training of Südwestmetall, the employers' association of Baden-Württemberg's metal and electronics industries, and IG Metall, Germany's largest workers' union (Windisch 2020).

4.2.4 Institutionalisation

Institutionalisation is defined here as the degree to which rules and responsibilities for arrangements are clearly developed and established. It is essential for public acceptance of validation procedures (Windisch 2020). Unsurprisingly, given the above, in the 2015 Bertelsmann study, Germany scored a C on institutionalisation. While the Bertelsmann study acknowledged clearly assigned responsibilities for certain procedures, it considered the overall degree of institutionalisation insufficient (Gaylor et al. 2015). Similarly, Ball (2019, 12) notes that, for instance, all the different aspects of Germany's external exam, which has allowed external candidates to directly sit the final apprenticeship exam related to their work experience since the Vocational Training Act of 1969, are the responsibility of the competent chambers. At the same time, however '[t]here is no central institution or a standardised institutional framework for the overall coordination of the different validation approaches […]' (Ball 2019, 13).

Switzerland is an example that illustrates how awareness and acceptance of outcomes can be achieved through the involvement of different labour market actors. Validation is seen there as

a cooperative task in which representatives of the different sectors and branches, the cantons and the Federal Government are all involved, each with specific responsibilities (Gaylor et al. 2015). According to the Bertelsmann study (2015), the stakeholders of Germany's dual VET system and the public employment agencies could get similarly involved in validation.

4.2.5   Support structures

Low-threshold access to support structures is needed in order to provide potential skills recognition users with the necessary information about the procedure and further training opportunities. In 2015, Germany's score on support structures was ranked at the lowest level because of limited provision and low levels of public awareness (Gaylor et al. 2015). By 2018, while awareness-raising was 'further improving in the context of the different kinds of initiatives and projects which are delivered below the legislative level' (Ball 2019, 13), according to Ball (2019, 22) 'many people are still not aware about the available validation opportunities'. In Finland, there are nationwide information points in addition to websites and online chats with experts. According to the Bertelsmann study (2015), Germany's chambers and public employment agencies would be well suited to providing the necessary support structures given their nationwide presence and long-standing advisory expertise. This could be modelled on the existing IQ Network advisory service (*Integration durch Qualifizierung Netzwerk*, English: Network for the integration through qualification) for holders of foreign vocational or professional qualifications. Created in 2005 and a nationwide network since 2011, the IQ Network provides free advisory services on the recognition procedures for foreign vocational and professional qualifications. It is financed by Germany's Federal Ministry of Employment and Social Affairs (*Bundesministerium für Arbeit und Soziales*, BMAS) and the European Social Fund (ESF). There are more than 100 IQ Network service points in cities across Germany and more than 60 mobile advisory services that ensure accessibility in rural areas (IQ Netzwerk 2018).

All of the above highlights Germany's implementation challenges, although it is not the only country struggling to set up a comprehensive and efficient system for the recognition of NFIVOS. Based on an international literature review and analysis of seventeen case studies, a study by the International Labour Organization (ILO) (Branka 2016b, 2016a) identifies the five most common challenges of skills recognition arrangements worldwide. They include understanding user needs; identifying and involving stakeholders; providing quality and accessible services; communicating and building awareness and participation; and monitoring and evaluating recognition activities' outputs and impact. Clearly, there are a number of challenges a country is faced with, not only in setting up skills recognition mechanisms but also in serving specific user groups, such as refugees.

5   Conclusions

The article has discussed the relation between refugees' arrival in 2015-2016 and skills recognition at the European level and in Germany. It has illustrated that prior to that, NFIL validation had already existed in Europe and was actively encouraged at the EU level. Yet, from the outset,

there had been implementation problems and across Europe, migrants had not been a major user group. As a result, improving the suitability of skills recognition measures to refugees has become an integration challenge (OECD 2017b). The focus on Germany in the second half of the article has highlighted that skills recognition has remained hard to implement. It consequently is not a surprise that, by 2020, skills recognition has not turned out to be the critical piece in the jigsaw puzzle of refugees' integration in Germany as initially widely assumed.

Nevertheless, regardless of the changing socio-political context, the topic of skills recognition will not disappear and will continue to occupy the governments and social scientists of Germany and many other countries in the future. In Germany, there is a long-term need for arrangements that formally recognise informal and non-formal learning because of the country's particular labour market focus on formal qualifications, especially regarding the target group of low-qualified but skilled Germans, estimated to amount to more than two million, and the rising number of foreign workers (BMBF 2015). The roll-out of Germany's ValiKom pilot project and at the European level, the 2017 Council of Europe Recommendation on the Recognition of Refugees' Qualifications (Council of Europe 2017) and the EU's New Pact on Migration and Asylum (European Commission 2020) released in September 2020 attest to this policy concern. Future research could further explore the challenges of skills recognition mechanisms in Germany in terms of reproductive economy and social exclusion processes.

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Zitieren dieses Beitrags

Die Autorin

Dr. HENDRICKJE CATRIONA WINDISCH

University of Oxford/Department of Education

369 Banbury Road, Flat 16, Summertown House, Oxford OX2 7RD, Oxfordshire, Großbritannien

Hendrickje.Windisch@education.ox.ac.uk und
Hendrickje.Catriona.Windisch@gmail.com

http://www.education.ox.ac.uk