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Recognition of professional drivers non- and informal learning



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Summary:

This paper discusses the relevance, the current status quo and opportunities opened up through validation of non- and information learning in the context of professional driver qualification in Europe. It highlights the relevance of such validation processes for an occupation such as professional driving that is highly relying on learning on the job instead of formal qualification. European instruments such as the European Qualifications Framework (EQF), the European Credit System for Vocational Education and Training (ECVET) and Council recommendation 2012/C 398/01 strongly foster the recognition of non- and informal learning in the context of the national education systems of the European Union member states. At the same the European directive on professional driver qualification (2003/59/EC) considers non- and informal learning of professional drivers only to a very limited extend especially in the context of mandatory continuous training. All in all the discussion comes to the conclusion that opportunities for the recognition of non- and informal learning are very limited for professional drivers but that the consideration of learning that takes place non- and informally could be strongly beneficial for both professional drivers and for the transport industry.

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(1) Relevance of recognition of non- and informal learning

In light of increasing qualification requirements on European labour and a challenging economical situation it becomes more and more important to take citizens learning outcomes into consideration that go beyond those acquired within formal education settings because an important part of individuals' abilities that are of major value on the European labour market are not gained within formal learning settings. A major share of these abilities is neither identified, documented, assessed nor certified. Those abilities are obtained by individuals on the workplace, in in-company settings, in their leisure time, during family or voluntary work, during uncompleted formal learning, through open educational resources or elsewhere. These abilities are often very difficult to proof for individuals and can, therefore, not be used on the labour market and in the education system to its full potential and value. This becomes especially relevant with regard to young people who are suffering in many countries from high unemployment rates and workers who possess no or only very low formal qualification. Therefore, the validation of non- and informal learning can have an important impact with regard to skill shortages, mismatches and unemployment by making the real abilities/ learning outcomes acquired through life visible and in this way contribute to the economic recovery and to the employability of individuals on the European labour market.

With regard to professional driving, abilities gained through non- and informal learning play an important role among the current workforce because a major part of today's professional drivers exclusively gained its vocational abilities and expertise on the job through non- and informal learning or vocational training other than for professional driving but does not have any formal recognition of these abilities gained over years of work experience. This missing formal recognition leads at least in some cases to negative consequences with regard to access to social security measures or to further learning opportunities in order to advance in the job. At the same time the ProfDRV interview results suggest the assumption that those abilities associated with work experience play a major role on the actual labour market within recruitment and with regard to wage levels and have in this context partially a far higher value than formal qualifications. But this attitude – to strongly rely on work experience within recruitment although very positive for experienced drivers - can also lead to difficulties for newcomers without work experience to enter into the occupation and can, therefore, increase the already existing difficulties to attract young people and job migrants for the job.

(2) European initiatives on recognition of non- and information learning

The validation of non- and informal learning is already since 2001 a matter of European policy when the EC defined lifelong learning as "all learning activities undertaken throughout life, with the aim of improving knowledge, skills and competences within a personal, civic, social and/or employment-related perspective" (COM(2001) 678 final, Brussels, 21.11.2001, p.9). Ever since a series of actions taken at European level related to the validation of non- and informal learning finally led in December 2012 to Council Recommendation 2012/C 398/01 on the validation of non-formal and informal learning. This recommendation asks the member states to "have in place, no later than 2018, ... arrangements for the validation of non-formal and informal learning ... [in order to] ...offering individuals the opportunity to demonstrate what they have learned outside formal education and training ... and to make use of that learning for their careers and further learning" (Council Recommendation 2012/C 398/01, Brussels, 20.12.2012, p.3). The European Commission speaks in this context about a "validation gap" with regard to validation of non- and informal learning that needs to be filled in order to "bring existing tools and instruments [such as the EQF] to their full potential" (SWD(2012) 252 final, Brussels, 5.9.2012, p.14).

The European transparency instruments already strongly consider and foster the recognition of non- and informal learning through tools such as Europass or credits within ECVET that are supposed to serve besides learning mobility also the recognition of non- and informal learning. Also the European Qualifications Framework and partially its national equivalents – although strongly focusing on formal learning outcomes – intend to incorporate

the recognition of non- and informal learning in order to facilitate lifelong learning of European citizens. The already previously mentioned Council recommendation 2012/C 398/01 on the validation of non-formal and informal learning has been adapted in order to further increase efforts to incorporate validation of non- and informal learning into the different national education systems. Further European tools such as different sector skills and qualification passports have been developed besides the different national efforts to integrate the learning outcomes of non- and informal learning into their education systems.

However, the previously mentioned "validation gap" describes the deficits that still exist in most European countries with regard to validation systems, processes and outcomes, awareness of and access to validation possibilities where they exist and cultural and attitudinal barriers towards validation of non- and informal learning (SWD(2012) 252 final, Brussels, 5.9.2012). But also considerations with regard to costs and quality/ reliability of the often complex validation processes of the diverse individual learning pathways lead to concerns with regard to the recognition of non- and informal learning that plays such a crucial role for workers and industry in Europe.

(3) Recognition of non- and informal learning in the framework of directive 2003/59/EC

Directive 2003/59/EC intends to define a minimum qualification for professional drivers all across Europe with regard to initial qualification and periodic training. The directive defines topics to be covered within training, duration of training and test and requirements on training providers and documentation of the qualification. Directive 2003/59/EC is, therefore, strongly input oriented by defining rather the organizational framework of the learning rather than to define the aspired learning outcomes. This makes the recognition of non- and informal learning challenging because there is no standard available for measuring the aspired learning outcomes to be achieved in one way or the other and the defined input criteria such as class room attendance for a certain number of hours does not recognise learning taking place in- and non-formally.

(3.1) Initial qualification

With regard to initial qualification the directive foresees 3 options among which the member states can choose in order to implement the directive:

- Test only option with further defined testing requirements
- Test and training (280 hours) with defined testing topics
- Accelerated test and training (140 hours) with defined testing topics

The test-only option opens a potential way into the recognition of non- and informal learning through the opportunity of participating in the test without compulsory prior formal training. The implementation practice, however, raises the concern that the test-only option can only to a very limited extend be considered as a way to receive recognition of non- and informal learning. Among the ProfDRV project countries the majority of countries (UK, AT, NL, HU) opted for the test-only option, Spain and Italy went for training & test and Germany allows both possibilities offered by the directive. But implementation practice strongly differs with regard to the realisation of the test only option.

The Netherlands for instance embedded their test-only initial qualification into their vocational education and training system that strongly builds on a separation of training provided by VET providers and a separate testing authority and applied the test-only option in this way. Contrary Austria does not offer such an initial training opportunity for drivers and exclusively relies on the test as an entry into the profession. It needs to be questioned how those abilities should be gained through non- and informal learning since the initial qualification test is a mandatory entry requirement into the occupation. This is especially difficult because annex 1 of the directive that

serves as a content-wise reference for the test primarily consists of clearly subject related topics that cannot be considered as to be gained elsewhere except partially in related occupations such as in the case of job migrants.

The German case raises another concern because the possible options to obtain the initial qualification are not assessed in the same way but different kinds of tests are implemented for the test-only and the accelerated initial qualification option. These different assessment standards are also defined in annex 1 section 2 of directive 2003/59/EC. The testing requirements on drivers can be considered as decreasing with the number of hours spend in formal training. The requirements on those individuals passing through test-only, therefore, appear to be higher as those passing through training and test.

Testing standards as defined in directive 2003/59/EC are:

- 280h training and test - written or oral test with at least one question on each of the objectives in the list of subjects under section 1 of annex 1
- 140h training and test - written or oral test with at least one question on each of the objectives in the list of subjects under section 1 of annex 1
- Test-only – theoretical test about 4 hours and practical test of 120 minutes (see further criteria below)

A common training standard is, therefore, not in place for those passing through training as for those obtaining their abilities elsewhere. This seems to be consequential from a control perspective and if it is assumed that formal training leads to the same or similar learning outcomes under any circumstances, but educational research does not support this assumption because learning strongly differs among individuals although learning environments might even be standardised. The different treatment within assessment of attendees of training and those obtaining their abilities non- and informally is, therefore, not justifiable from a learning perspective and in terms of an equal consideration of different ways to obtain learning outcomes.

The absence of opportunities to obtain parts of initial qualification through training only is another difficulty with regard to recognising learning outcomes that have been obtained non- and informally. There is no opportunity included into the test-only option to proof parts of the required learning outcomes only and to fill the gaps with training in the investigated cases. Similarly also the training options are usually not corresponsive and adaptable to individual learners prior abilities and do, therefore, not recognise non- and informal learning.

However, the testing requirements as they are defined in annex 1 section 2 of directive 2003/59/EC can be considered as promising with regard to their ability to equally assess learning outcomes obtained within formal training and in- and non-formal settings because they incorporate a major relation to work practice through practical tests and case studies that refer to the work practice of professional drivers:

Extract from annex 1 section 2 of directive 2003/59/EC on the requirements on assessment in the framework of the test-only option:

“(a) The theoretical test shall consist of at least two parts:

- (i) questions including multiple-choice questions, questions requiring a direct answer, or a combination of both;
- (ii) case studies.

The minimum duration of the theoretical test must be four hours.

(b) The practical test shall consist of two parts:

- (i) a driving test aimed at assessing training in rational driving based on safety regulations. The test must take place, whenever possible, on roads outside built-up areas, on fast roads and on motorways (or similar), and on all kinds of urban highways presenting the different types of difficulties that a driver is liable to encounter. It would be desirable for this test to take place in different traffic density conditions. The driving time on the road must be used optimally in order to assess the candidate in all traffic areas likely to be encountered. The minimum duration of this test must be 90 minutes;
- (ii) a practical test covering at least points 1.4, 1.5, 1.6, 3.2, 3.3 and 3.5.

The minimum duration of this test must be 30 minutes.

The vehicle used for the practical test must meet at least the requirements for test vehicles as defined in Directive

91/439/EEC.

The practical test may be supplemented by a third test taking place on special terrain or on a top-of-the-range simulator so as to assess training in rational driving based on safety regulations, in particular with regard to vehicle handling in different road conditions and the way they change with different atmospheric conditions and the time of day or night.

The duration of this optional test is not fixed. Should the driver undergo such a test, its duration may be deducted from the 90 minutes of the driving test referred to under (i), but the time deducted may not exceed 30 minutes.”

All in all the overall initial qualification as defined by directive 2003/59/EC suffers strongly from a missing common standard in terms of commonly defined learning outcomes that can be used as a common reference for testing learning outcomes independently from the learning context they have been obtained in with regard to the recognition of non- and informal learning.

(3.2) Periodic training

Periodic training requires professional drivers to go through 35 hours of training in a framework of 5 years. Furthermore directive 2003/59/EC foresees an optional test in addition to the 35 hours training. Such a test is, however, only implemented by one of the investigated countries - Hungary - in the framework of ProfDRV. The remaining project countries opted for the training only option without test. While the majority of project countries implements a standardised repetitive set of topics to be trained in the framework of these 35 hours every 5 years, only the Netherlands and the UK provide for a large extend of flexibility with regard to topics to be covered in the framework of these trainings. Other EU member states such as Denmark apply combined approaches with fixed topics and topics to be chosen freely. The recognition of non- and informal learning per se is not foreseen in any of these application approaches of periodic training.

Also within periodic training there is no common training standard in terms of required abilities/ learning outcomes defined. But the applicability of such a common training standard is also dependent on the national implementation approach chosen for periodic training. While countries with a fixed set of topics to be covered within periodic training such as Germany seem to aim for such a common training standard, other countries such as the Netherlands or the UK seem to underline a lifelong/-wide learning approach that enables a certain level of customisation and individualisation of periodic training by allowing a wider range of training topics to choose from.

In the case of an aspired common training standard non- and informal learning is not considered as an alternative way to achieve the aspired standard/ learning outcomes due to the defined input parameter of hours to be spend in training within periodic training. However, the information collected in the framework of ProfDRV does not allow for the assumption that in any of the investigated countries such a common training standard has been defined in terms of learning outcomes to be achieved. The preconditions for the recognition of non- and informal learning in such as context are, therefore, not given. But especially periodic training in order to achieve a common training standard might strongly benefit from such recognition opportunities. It can be expected that professional drivers who carry out this occupation on a regular basis learn informally every day at the workplace by for instance solving problems related to their work or by being confronted with situations that require the obtaining of new or updated knowledge, skills and competences in order to carry out their work. Also non-formal learning can be expected to take place regularly close to the workplace through measures such as instructions issued by employers and supervisors or through other in-company training measures. Similarly, also distance learning approaches in order to adapt training to the work reality of especially long-distance drivers that are currently tested and further explored in different pilot settings could be fostered through procedures to recognise non- and informal learning in the context of periodic training.

With regard to the application of a lifelong/-wide learning approach within periodic training it needs to be questioned if recognition of non- and informal learning is necessary in such a context at all, because the additional training requirements can be fulfilled by choosing courses that enable the achievement of abilities in addition to

those that have been achieved elsewhere already. Educational counselling by bodies such as training providers can fulfil a supporting role within such an implementation approach.

(4) Possibilities for professional drivers to receive recognition of non- and informal learning in the ProfDRV project countries

Recognition of non- and informal learning within vocational education and training is still a rather heterogeneous concept in Europe and a minority of European countries has mainstreamed strategies in place in order to recognise abilities acquired in- and non-formally within the formal vocational education and training system. Such countries are for instance France and the Netherlands and also Spain and Germany have partial systems for the validation of non- and informal learning in the formal VET system in place (COM(2012) 485 final):

The example of Spain

According to the modular nature of the vocational training catalogue each professional profile is defined according to a set of competences (unit of competence) that could be acquired through formal training/learning activities, or through the following process:

Regional governments are responsible to develop the process to prove the competences acquired through in-formal and non-formal learning. Every year, they launch a regional call to prove certain competences related to several professional profiles (specially profiles related to jobs that usually didn't require special training or training jobs that traditionally have been closely related to "informal" occupation: cleaning, personal care, etc.). After publication, candidates can submit a pre-candidature to the responsible authority. Qualified advisers will analyse the candidature, and assess candidate about what to do: apply for the process or receive specific training to improve the competences. The first formal step is the evaluation of the candidature: qualified evaluators assess the candidatures: documents about candidate's experience, non-formal and informal learning results, etc. Evaluators could ask for more information about the candidate or (if the case) propose an exam (theoretical and/or practical) to test this competences or also to check in situ the skills of the candidate. The result could be positive, so the candidate will continue the process; or negative, the candidate will receive the feedback and a relation of appropriate training options that will help her/him acquire these competences in the future. The last step is the Accreditation, the formalisation of the process; that is when the authority issues the certification.

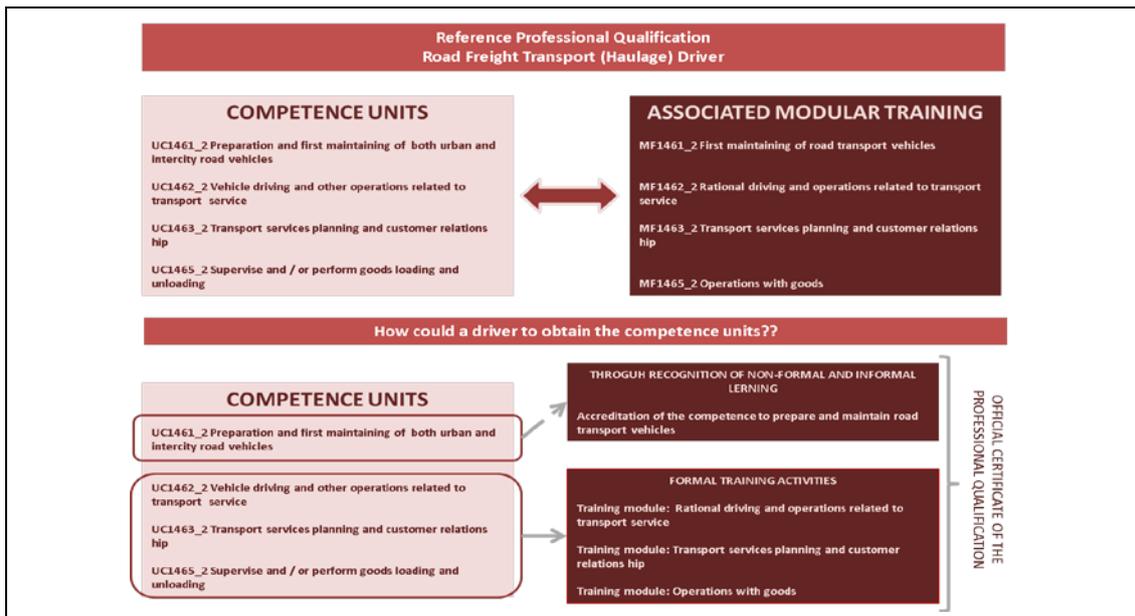
After the accreditation a candidate can receive:

- Certification of professional profile (if the candidate proves all the competence units included in the
- Vocational training – academic certification, if the candidate proves all the competences included in the certification)
- Technician or high technician certification, only in specific cases when the public authority can certify the acquisition of all competences included in the certification.

The certification, obtained according to this procedure, is valid for educational and labour authorities in Spain.

The modular system of the Spanish vocational education catalogue, therefore, allows combining formal and non-formal /in-formal training to certify competences of a professional profile. So, a person could attend some formal training programmes to prove a specific competence and other competences could be acquired by formal training. In fact, it is not mandatory to go for a training course to obtain the competences defined in each professional profile. In fact the body that recognizes the competences acquired by non-formal and informal learning, establishes additional or complementary formal training, if after the evaluation she/he can not prove all necessary competences through non-formal and informal training.

With regard to professional driving there is a Professional Certificate in place in Spain: TMV455_2 (level 2 of competences) - Road Freight Transport (Haulage) Driver. Unfortunately no regional government has approved any regulation to certificate competences related to the professional qualification for drivers so far. Therefore, the recognition of non- and informal learning in this way is only theoretical in the case of professional drivers. The graphic below displays the overall process for Road Freight Transport (Haulage) Drivers:



The example of Germany:

The possibility for recognition of in-/non-formal or prior learning within the formal vocational education and training system in Germany is so far possible through the "Externenprüfung" (external examination) only. This external examination allows individuals with several years of work experience in a certain profession to participate in the regular IVET examinations for apprentices in order to obtain a skilled worker certificate in the profession he/she carried out before. A filling of gaps in the own knowledge, skills and competences through complementary training is unfortunately not possible so far. Recent efforts to explore the implementation of ECVET (European Credit System for VET) in Germany with the DECVET initiatives as well as the piloting activities for the "Teilqualifikation" (partial qualification) in which also professional driving has been further explored can be considered as possible interfaces in order to implement this "filling of gaps" within the non-/informally acquired abilities with the attendances of courses. Theoretically it is, therefore, possible to obtain the skilled worker certificate "Berufskraftfahrer" (professional driver) through the proof of abilities acquired through non- and informal learning. However, this system is only rarely used.

The implementation of National Qualifications Framework that follow the EQFs overall concept incl. opportunities for the validation of non- and informal learning and of the European Credit System for Vocational Education and Training (ECVET) approach that intends to facilitate the recognition of non- and informal learning through the application of credits within formal vocational education and training as well as Council recommendation 2012/C 398/01 on the validation of non-formal and informal learning can be considered as important steps towards the further extension of these so far limited opportunities to enable the recognition of workers non- and informal learning in formal learning contexts in Europe. Such opportunities might also be important steps for professional drivers in future in order to obtain a skilled worker certificate based on their work experience, prior learning such as in a related field of work or other non- and informal learning settings such as periodic training in the framework of directive 2003/59/EC. This could be an additional step towards a further professionalisation of this occupation and, therefore, also to an improvement of the overall occupations image and reputation by transforming it into a career within transport and logistics rather than a last choice or dead end.

But validation of non- and informal learning does not necessary need to lead to the obtaining of a formal qualification but to make individuals abilities visible for instances towards employers or education and training institutions/ stakeholders. The recognition of non- and informal learning plays, therefore, also an important role in the framework of job transitions and in a employment context. It has been said before that within recruitment processes of professional drivers the experience a driver has in this field of work is often a major criterion for employment regardless of the qualification he/ she holds. But experience in terms of years on the job is not the only indicator to determine abilities to act competently at the workplace. Validation of non- and informal learning (implemented by formal competent bodies or other accepted institutions) - and therefore the facilitation of

transparency of professional drivers actual abilities - can play an important role in this context as well and especially under consideration of the shortage of qualified drivers and the consequences of staff turnover and fluctuation for the transport industry. The ProfDRV project partner CTHRC (Canadian Trucking Human Resources Council) worked on this topic and developed a number of tools and instruments for this purpose based on a task analysis that led to a National Occupational Standard (NOS) for professional drivers. These NOS can be applied in the context of training as well as competence assessment. The learning outcomes oriented and EQF (European Qualifications Framework) compatible ProfDRV core profile for professional drivers can serve as a similar reference in such a context and with regard to the recognition of non- and informal learning.

Independently from these application contexts special attention needs to be paid to assessment when it comes to recognition of non- and informal learning. Classical assessment as practiced within the formal vocational education and training systems often tends to disadvantage learners having obtained their learning outcomes outside formal learning settings. Likewise the absence of clearly defined learning outcomes as a basis for assessment is a major obstacle for the recognition of non- and informal learning. The problem here is the tendency to focus on knowledge rather than on skills and competences which are primarily developed at the work place or in other non-/informal settings. Therefore the definition of learning outcomes that refer to all three EQF descriptors (knowledge, skills and competences) and the application of appropriate assessment procedures are of major importance in order to ensure equal opportunities for learners who obtained their abilities within non-, informal or formal learning settings.

(5) Conclusions

The recognition of non- and informal learning is one of the key elements of the current European education policy and is a major parameter within the European Qualifications Framework (EQF), the European Credit System for Vocational Education and Training (ECVET) as well as Council recommendation 2012/C 398/01 on the validation of non-formal and informal learning. The EQF's learning outcomes approach strongly supports the recognition of learning outcomes regardless of the context in which they have been obtained in. However, this has major implications on education practice with regard to information and counselling of users, definition of learning outcomes, assessment and validation procedures, etc.. This is especially applicable in otherwise and so far rather input oriented education systems as it is the case in many European countries' vocational education and training systems as well as in directive 2003/59/EC on professional driver qualification.

With regard to professional drivers the recognition of non- and informal learning is of major relevance because this group of workers has a rather low level of formal qualification, but acquires a lot of abilities in the course of their work which are not valued with a relevant certificate. Unfortunately, opportunities to receive formal recognition for these abilities are very limited. The just recently launched European professional driver qualification directive allows the recognition of non- and informal learning only to a very limited extend within initial qualification and not at all within periodic training. It rather fosters learning in traditional class-room setting regardless of learning that takes place during the every day work of professional drivers on their job and the learning that takes place on the workplace. But also the national formal vocational education and training systems open only rarely the opportunity to receive such recognition of non- and informal learning to professional drivers and other groups of workers.

The current trend – facilitated and promoted by the introduction of European instruments such as the EQF and ECVET – towards learning outcomes orientation does, however, favour and foster the recognition of non- and informal learning within traditional and new vocational education and training paths incl. those for professional drivers. Outcome orientation within vocational education and training is therefore an opportunity for professional drivers and for the transport industry to make the actual whole set of abilities a driver holds transparent within different application contexts. It allows drivers to proof their abilities towards employers who would otherwise not

know what their actual abilities are. Further education opportunities for drivers individual career pathways can be opened by recognition of non- and informal learning. Also formal training attendance that needs to be considered an obstacle in a mobile job as professional driving can be replaced by learning that takes place in- or non-formally at or close to the workplace. At the same time, recognition of non- and informal learning opens up new opportunities with regard to ensuring continuous/ periodical update of professional drivers knowledge, skills and competences with other approaches than learning in formal (usually class-room based) settings such as distance learning approaches. All this can facilitate a more transparent and individualised way of learning that is more responsive to the work reality of professional drivers than the current training and recognition praxis.