



towards
recognition
of prior learning



REPORT ON CRITICAL FACTORS OF RPL IMPLEMENTATION IN POLAND

Report prepared within the project “University Recognition of Prior Learning Centres – Bridging Higher Education with Vocational Education and Training”

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1.1 Purpose of the report on critical factors of RPL implementation in Poland

The analysis of the critical factors of RPL implementation in Poland is to:

- analyze the conditions of internal and external environment relevant to the development of the LLL system, especially RPL, and identify the factors of particular importance for the development of RPL,
- reflect on how different factors may enhance or block the implementation of RPL,
- Identify those elements of public policy that most influence the development of RPL in terms of both quantity and quality.

The analysis was carried out in parallel in a country with well-established and continuously improved RPL system (Scotland) and in two countries (Poland and Croatia), which are currently developing the concept of RPL implementation and in the URPL project want to transfer this kind of social innovation. This report is to deepen and widen the report concerning the development of RPL in different European countries, previously prepared by the URPL project team members.

1.2 Introduction

The education and career orientation system in Poland can be generally characterized by high formalization, rigidity and unique on a European scale dominance of formal education, particularly school education. Poland is currently one of the leaders in the EU in the dissemination of education at all levels. This is confirmed by research of both the OECD and the EU and World Bank. According to European Commission report of July 2008, Poland has made the greatest progress in improving the competence of the reading (PISA research), has the lowest share of youth (18-24 years) early school leavers and the highest rate of people continuing their education over 19 years of age (Progress, 2008). Enrollment rate for higher education has remained for several years over 51%. Simultaneously, according to the same report, the value of a comprehensive development index of learning (proving the development of Lifelong Learning), places Poland on one of the last places in Europe. The above mentioned report highlights poor fit of education and training systems to labor market needs and one of the lowest in the EU level of adult participation in learning - 5.2% of adults

in Poland, while the average for EU countries is 12% (GUS , 2009). One of the reasons for this are limited opportunities to certify skills acquired in non-formal system and the almost complete lack of validation in a formal system of skills acquired informally.

Many trade associations (professional corporations) limit access to the profession, making it dependent on several years of practice, completion of vocational courses and passing special exams. In Poland, more than 130 occupations require permits and licenses to operate. This fact is both the result of the lack of permeability between the systems of formal education and labor market needs, on the other hand results from monopolizing access to the profession, as well as monopolizing the right to decide who can practice the profession. The existence of these restrictions limits significantly professional mobility in Poland.

1.3 The reasons why Lifelong Learning, including Recognition of Prior Learning, should be developed in Poland

Although several years of Polish participation in various international bodies related to the work on the development of Lifelong Learning, only in recent years the debate on the new strategy and policy in this regard was widely taken. The work of the Interministerial Team for learning throughout life, including the National Qualifications Framework, which goal was to develop a strategy document, entitled "The prospect of learning throughout life" (Perspective, 2011) was completed. However, in a common perception, lifelong learning (Pol. "uczenie się przez całe życie") is still associated in Poland with "constant learning" (Pol. "kształcenie ustawiczne"), which has a pejorative meaning as a synonym for educational passivity and low efficiency of education. Work on the National Qualifications Framework entered a phase of defining the learning outcomes and in relation to formal education, especially higher education, is under implementation.

Despite many critical remarks, one must be stressed that Poland belongs to a group of EU countries, which are intensively rebuilding their education policy, towards "learning throughout lives" policy. This is expressed for example in a stronger orientation of education on skills development and a strong emphasis on developing key competencies, which is in line with the demands of the business environment. There has been a significant change in the quality assessment of education in the formal education system - in the direction of checking the degree of educational outcomes achievement, not - as it used to be - accuracy of the process of education. More and more importance in discussions about the changes of the education system is attached to the development of non-formal learning opportunities and the importance of informal learning is widely recognized.

There is an increased awareness of the need for a considered policy of creating conditions and supporting learning in different places and in the course of a lifetime. In the face of profound economic change and the dynamically changing needs of the labor market and rapid increase of knowledge, two trends can be observed in promoting a stronger link of the education system with the labor market:

1. still persisting separation of the formal education system and the system of professional orientation,
2. stronger integration of the elements of practical training for the formal education system through: differentiation of schools, curriculum, and profiles of education (general and vocational), the real link between education and practice - facilitated, inter alia through the introduction of legal regulations concerning the admission of students and graduates for professional practice.

Poland for several years has been modernizing the educational system trying to better connect it with labor market needs and reach specific educational effects. At the same time quality assurance systems are being improved and flexibility of pupils and staff's skills development pathways is increasing. We are also witnessing the opening of the Polish education system to international contacts and increase of students, pupils and interns mobility.

At present, the degree of fulfillment of these objectives is affected by several important developmental conditions (global, European and national):

1. The global crisis that has tangibly demonstrated the importance of global processes and economic ties to the condition of local economies, contributed to the reduction of expenses, forced to increase efficiency, improve service quality and contributed to a slight increase in unemployment.
2. European conditions, primarily the existence of large European projects, in which Poland is actively involved, for the reconstruction of the education system, especially the construction of the European Education Space and Lifelong Learning system development (access to the know-how, the ability to influence the shape of the programs, participation in the exchange of experience).
3. The availability of EU funds, which can be utilized for the development of human resources - expertise and programs preparation, as well as direct support for various forms of learning which enable to develop, update and acquire new professional skills.
4. The large potential of Polish youth, who has had experience of studying in other European countries (more than ten thousand people per year) and work abroad. A significant

proportion of young migrant are people with high qualifications. Many of these people come back and Poland lost a large capital without the possibility of formal recognition of qualifications acquired by them.

5. The Polish labor market to a large extent consists of young people, the baby boomers of the 70-80 (50% of them has higher education diploma, in this 80% Master's degree). It is about 4.5 million well-educated young people who graduated in the years 1999 to 2011 (over 400 thousands graduates yearly). It is the largest Polish capital at the beginning of the XXI century. Providing opportunities to maintain professional attractiveness of this generation will determine the success of the development of Poland - which is why the development of LLL system, including the system of RPL, is so important.
6. Profound demographic decline, which has already covered the entire sector of formal education and will last for about 13 years. It gives a chance to improve the quality of education, as well as the faculty shift from the formal education system for non-formal education system. In prepared programs, a very large emphasis is put on teachers' training, requirements change, teaching skills, including skills related to supporting the learning of educated people with significant professional experience.

1.4 Status and perspectives for the implementation of RPL in Poland (including the institutional system, advancement of the National System of Qualifications and National Qualifications Framework development)

The Polish education policy thinking is still dominated by equating it to the activities connected with formal education and linearly defined process of acquisition and development of competences. This policy does not recognize many of the phenomena characteristic for contemporary society, including the Polish society, which constitute major challenges for modern systems of education and force decision makers to take different approaches while developing and implementing educational policies, which allow more flexibility to shape of career path. Among these phenomena, Piotr Piasecki (2011, p.22-25) distinguishes: the phenomenon of work life balance (addressing the different dimensions in life), delaying decisions related to career, taking over by employers roles of promoters and sponsors of employee competence development, the growing demand for training courses for active seniors who want to develop their skills, reaching for the knowledge when it is needed unlike the traditional attitude which promoted the most comprehensive collection of knowledge, availability and co-creation of

knowledge in the net. Opening up to this new phenomenon requires thinking about educational policy in terms of Lifewide Learning, which enables personalized and flexible development process. A boundary condition for building a coherent system of Lifelong Learning, is to create opportunity for recognition of qualifications acquired outside the formal education system (RPL).

In Poland there is no system for the recognition of qualifications obtained in non-formal and informal mode. There is no support for the realization of flexible competence development paths. The degree of personalization of learning processes is very low.

This does not mean that the term for the recognition of qualifications acquired outside the formal education system is in the Polish economic reality completely abstract. Traditionally, it has a very specific dimension in the craft. In companies - mostly small ones, actually held qualifications are often appreciated, without regard to their formal acknowledgment. In public organizations the formal requirements (diploma) must usually be completed, but the certificates from specialist courses conducted by training organizations which represent the sector outside of formal education are also valued. In relation to the group of about 300 regulated professions (the largest among in all EU countries) internal qualification systems and formal, closed ways of their recognition are built. Completely not widely known are: achievement accumulation and skills transfer tools, education accounts and other instruments which support the development of flexible competence development, which are well developed in many EU countries.

Nonexistence of the system of recognition of qualifications acquired outside the national system of education, does not mean that some of the elements of the system are not developed. The rules of recognition of skills acquired through formal education abroad (Ustawa o zasadach, 2008) are clearly defined. Above mentioned, system of recognition of qualifications gained through work experience in craft, is also well-developed.

The greatest resistance concerns the recognition of informally developed competences - through self-education and professional experience.

This type of learning has no strong social representation, able to fight for its recognition, and is the threat to the interests of the employees of both the formal education-related and non-formal

education organizations. This situation seems to be a major challenge, because in today's mobile society, with the rapid development of technology and information systems, non-formal education plays a very important role. It is easily seen that at the present state of technology is the cheapest way to develop skills. It is associated with individual learning, finding and organizing knowledge. It requires perseverance, determination, and - perhaps most importantly - creativity. Expulsion of non-formal education beyond formal recognition sphere may lead to building alternative systems of acquisition and validation of qualifications.

It should be recalled that in the process of building a European Area of Lifelong Learning (LLL) as a basis for the concept of LLL implementation, the following rules were adopted:

- equivalence of learning in various forms, places and periods of life (formal, non-formal and informal),
- conducting identification, assessment and recognition of learning outcomes regardless of the form, location and duration of the operation,
- learning from the first till last years of life, which requires identification of the learning situation - especially the practical, fair assessment of its effects and appreciation in the qualifications systems.

1.5 Predicted critical factors in the process of RPL implementation in Poland

1.5.1 Legal system and the institutionalization of RPL

In recent years, Poland has changed the legal basis for the functioning of the formal education system at all levels. The common axis of these changes was the legal empowerment of the National Qualifications Framework. Significant progress in the sphere of institutionalization was made through the articulation of principles and rules of the new system and the establishment of institutions that coordinate and support the development and implementation of the NQF. Among the institutional processes change of the legal basis for defining the way of formal education services and relations with the outside and informal education should be mainly noticed. You may notice several stages in the construction of foundations of recognition system in Poland (of a legislative nature). Detailed below can be found changes in the approach to learning and skills development (in part by strictly chronological order, partly because of their nature and importance):

First stage - the deep transformation of the legal system for education, vocational education, higher education and science.

It was launched at the turn of the century. It introduced greater flexibility in the education process and external examinations evaluating student performance. A strong external quality assurance system of higher education was also established at this stage.

Second stage - The next phase was initiated only in 2008, when more attention to learning outcomes was paid.

Primary and secondary schools were required to develop pupils key competencies in the process of education. In vocational schools, training was directed at the development of clearly defined skills. Higher education organizations were obliged, by the new law of 2011, to determine - through September 2012, the effects of education. It should be done according to the National Qualifications Framework and defined and implemented in accordance with the needs of employers. Higher education providers are also compelled to monitor the fate of graduates and implement internal quality assurance systems, including criterion of usefulness of education programs (Ustawa z 18 marca 2011).

Third stage – when necessity of RPL development in Poland was noticed

In February 2011 the government adopted a revised document setting out the strategic framework for the development of Lifelong Learning in Poland (Perspektywa, 2011, 50-51), whose provisions were included in the key strategic documents of the State: Strategy of Social Capital Development and Strategy of Human Capital Development.

Through the work of the Interministerial Group, the nature of the policy was clearly specified. *"Policy for learning throughout life is to enable every person access high quality learning in various forms, places and times in lifetime and to evaluate and appreciate the effects of such learning in a coherent and transparent systems of qualifications. This policy covers all learning - in all contexts (formal, non-formal and informal), at all stages of life and at all levels of competence and qualifications. It is realized in cooperation of the government, local government, employers, employees and community organizations. Due to placing the learner at the center of the policy, its (policy) measures of effectiveness relate directly to the experiences of people in terms of equal educational opportunities,*

quality of learning and its effects - the level of competence and qualifications" (Perspektywa, 2010:5).

Among expected strategic lines of intervention for achieving the "clear and coherent system of qualifications" goal, provisions relating directly to the validation and recognition of qualifications obtained outside the formal education system were included. "The introduction of procedures for assessing and recognizing the achievements of learners from the point of learning outcomes perspective, regardless of location, method and time of learning, education and training (using open approach to award qualifications):

- adapting the procedures of examination at all levels of education and training to assess the competence, regardless of the circumstances in which education and training took place,
- creation of a system of recognition of qualifications acquired outside the formal learning,
- the inclusion of representatives of social partners and civil society organizations to monitor compliance of the examination systems and the validation of qualifications based on learning outcomes "(Perspektywa, ... 2011, pp. 50-51).

The introduction of a standardized description of the qualifications as learning outcomes, including a national register of qualifications and the establishment of institutions for the national system of qualifications and record keeping skills was also planned. Documents also underline the necessity to "ensure the transfer of learning achievements, including partial qualifications:

- the implementation of ECVET system in vocational education and training,
- ensuring consistency between the systems of ECVET and ECTS "(Perspektywa, ... 2011, p 51) .

In the same strategic document, in relation to the goal number 5 ("The working environment and community involvement aimed at promoting adult learning"), 11 strategic lines of intervention were mentioned, including "Creating a system of assessment and recognition of learning outcomes other than formal (validation system), as basis for a modern model of adult education" (Perspektywa, 2011, 62):

- Initiating and promoting standards for identification and assessment of competencies acquired outside formal learning,
- Introduction of validation mechanisms to the system of law governing the acquisition and confirmation of qualifications,
- Supporting and promoting model examples of validation,

- Development of institutional infrastructure for realization of tasks such as recognition of skills, including broadening the scope of the qualification awarding bodies with the task of validation,
- Initiating programs for development of a validation system in the areas of particular importance for the economy and social cohesion (e.g., recognition of learning outcomes resulting from the experience of emigrants returning to the country from abroad). "

With regard to the same goal, in another direction of strategic intervention "Developing a model of adult learning, which is based on practical learning, including learning at work and in organized forms of communities of citizens activity" (Perspektywa, 2011, 62) among the many detailed activities envisaged e.g.:

- "Promoting non-formal learning, including in particular training in the workplace and community involvement, promoting learning in the workplace as a primary form of adult learning,
- Promoting the involvement of employers in improving skills and increasing qualifications of employees, including the creation of internal systems of employees competence development,
- Initiating and promoting the relationship of internal staff development systems to workers' career paths. "

The next strategic direction of intervention for the goal: "Promotion of new standards of adult education" (Perspektywa, 2011, 63), provides, among others:

- "the promotion of flexible offer, including modular training, supporting and promoting personalized approach to training,
- the inclusion of trainings in systems of collection and transfer of achievements, leading to accreditation of qualifications,
- promoting continuous evaluation of training and monitoring of participants' careers. "

As a result, organizations which role is to coordinate change process were established. A special role was given to the emerging National Qualifications Framework. According to Jens Bjornvalda (2011) in different countries, the National Qualifications Framework has different functions. They are a tool to describe the existing status quo, a tool of communication between education and labor market and a tool for the education system regulation. The above mentioned author believes that Poland is an example of a country which gave them (NQF) a special role – a tool of reform which helps:

- reform the standards and training programs
- validate informal and non-formal qualifications,
- build connections between academic and professional qualifications,
- introduce coordination between national and regional stakeholders.

Fourth stage - Building the institutional basis for the National Qualifications System, including validation and recognition of qualifications.

Crucial for building a recognition system is to build a standardized system of qualifications. Poland has been working on it since 2006, but only in February 2010 Intergovernmental Team on Lifelong Learning, including the National Qualifications Framework, was established (this team is the political base for this process). The intergovernmental Steering Committee for the National Qualifications Framework, chaired by the Minister of Science and Higher Education, monitors the development and implementation Polish Qualifications Framework .

The system project, which aims to develop substantive and institutional principles of implementation of the national qualifications framework and a national register of skills for learning throughout life, is being implemented (2011-2013) by the Institute for Educational Research. According to assumptions prepared by the team: "National Qualifications System is defined as all state activities related to the confirmation of the learning outcomes for the labor market, civil society and the individual development of learners, based on the national qualifications frame. It includes in particular recognition of qualifications and quality assurance of qualifications' (Krajowy System, ... 2011, p. 13-16).

The system is based on two main principles:

- 1) Quality assurance of qualifications (in education, training, validation and transfer of achievements) and
- 2) Transparency of qualifications accredited in Poland at national and international levels.

The Polish Qualification System consists of:

1) Polish Qualifications Frame, which has 8 levels, "takes into account the learning outcomes achieved in formal education system and as a result of non-formal and informal learning." (Krajowy System, 2011, 7),

2) National Register of Qualifications, led by the National Authority for Qualifications System, in which will be included all qualifications (full, partial, complex, and components). "It will contain the following information for each (registered in it) qualification:

- Level in Polish Qualification Frame
- Type / category of qualification (full, partial, complex, component)
- Institutions which have a right to accredit the qualification
- Requirements (standards) on learning outcomes
- information on validation methods ". (Krajowy System, ... 2011, p.9)

3) Validation

"Validation of learning outcomes for full qualifications will be the task of institutions already existing in the Polish system of education and higher education, i.e. especially schools, universities, the Central and Regional Examination Comissions. In the case of partial qualification validation can be provided by either above mentioned institutions and other (including commercial) as long as validation is consistent with accepted principles of the system of qualifications' (Krajowy System, ... 2011, p.10).

4) Accumulation and transfer of accredited achievements

"For accumulation and transfer of accredited achievements in the qualifications system, existing or planned systems of accumulation of achievements will be used. It is assumed that the process of accumulation and transfer of achievements will be compatible with European solutions (ECTS, ECVET), which will allow the transfer achievements in the qualification systems in individual member countries."(Krajowy System, ... 2011, p.11).

5) Quality assurance of qualifications

Considered to be a key component of the system. It is assumed that quality assurance solutions allow to compare institutions and qualifications, and to strengthen international competitiveness and recognition of qualifications, particularly in education and training."(Krajowy System, ... 2011, p.11).

After the entry into force of the revised Law on Higher Education (1 X 2011), the process of developing the National Qualifications Framework in formal education has been significantly advanced. From September 2012 Polish universities will educate on the basis of programs defined by learning outcomes, correlated with the NQF system. Unfortunately, this law has no provisions governing the possibility of recognition of qualifications acquired outside the formal education

system. The recognition of qualifications acquired in the formal mode in other countries and recognition of qualifications in regulated professions are only regulated (Ustawa o zasadach uznawania, 2008).

Moreover, the Minister of Science and Higher Education coordinates the recognition of qualifications in regulated professions and activities, and provides information on the subject. Competence in this area are divided between two divisions in the Department of Supervision and the Organization for Higher Education, Ministry of Science and Higher Education: Division of Academic Recognition and Division for Coordination of Professional Qualifications Recognition System. Their powers include: conducting proceedings in cases of non-recognition of documents on education obtained abroad, participation of Poland in ENIC network (European Network of Information Centre on Academic Recognition and Mobility - the network of the Council of Europe / UNESCO) and NARIC (National Academic Recognition Information Centre - a network of European Commission), coordinating the implementation and operation of the system for the recognition of professional qualifications in the Republic of Poland (this applies to regulated professions), serving as an information center on matters related to the recognition of professional qualifications and participation in meetings of the European Commission and European Union Council's regarding professional qualifications recognition system in the European Union.

Areas of expertise of above mentioned departments suggest that the structure of the Ministry foresees the development of higher education activities related to the recognition of professional qualifications. However, it should be emphasized that at present this applies only to regulated professions.

The lack in the Polish legal system of category “qualifications recognition” has to be emphasized (with the exception of regulated professions, in particular the recognition of qualifications in regulated professions acquired in EU Member States).

Advancement of the process associated with the development and implementation of the European Credit System for Vocational Education and Training ECVET is much worse. The development of this system will be the first step which will enable construction of the validation of professional qualifications acquired outside formal education system.

In countries dominated by formal education, such as Poland, the effects of non-formal and informal learning are not adequately diagnosed and recognized. Implementation of ECVET will require much time, because there is no system of validation of learning other than formal. It seems that this is one of the critical factors that will require the construction of systems on a regional or individual institutions level.

1.5.2 Social acceptance

The results of research closely related to the diagnosis of attitudes towards the RPL system in Poland are unknown. However, some conclusions on the level of acceptance can be drawn, because in many publications this topic appears. Participation in numerous discussions, for example, related to the implementation of regional standards for education and training services in Małopolska, also raises definite conclusions. As it was mentioned before, in Poland there is a large formalization, rigidity and unique on a European scale dominance of formal education, particularly school education. Respect for formal education and the desire for education, especially of a general nature, including at university level, exists.

In the social consciousness some stereotypes of a bygone era still remain, in which qualifications could be obtained thanks to political merit and a person could even get in that way a degree. Concerns about deprecating the diploma of higher education in Poland increased after the changes initiated in 1990, when suddenly non-public higher education institutions began to develop, and some of them weakened the requirements of a quality education. Massification of higher education also influenced in negative way the quality of education in Poland.

In the last 20 years we observed a very dynamic development of a training sector. High availability of funds for this purpose, mainly within the framework of EU programs, means that next to organizations with a high level of professionalism in training services, there is a lot of companies interested mainly in consumption of funds, not in providing services of a high quality. All of these factors, in conjunction with a concern about reduction of the number of students and teaching hours (which is related to the number of jobs at universities), in connection with the partial recognition of qualifications, cause that

in the academic environment, a large distrust for the introduction of the recognition of qualifications obtained in non-formal mode exists.

Research conducted under the project of the Ministry of National Education, "Building the substantive and institutional foundations for the creation of the National Qualifications System" shows that

employers often do not positively evaluate the employees readiness to professional mobility (Znaczenie inicjatyw, 2012). They treat it as an indicator of the level of disloyalty.

In other words, if an employee shows an attitude open to improvement and, particularly, is ready to acquire new skills, he/she is suspected of disloyalty. The authors' own research on the situation of PhD graduates shows that many doctors who are employed outside academic institutions, decide to hide the fact of possessing a degree. Interviews in HR companies confirmed that they advise PhD student to hide information about their current educational status.

Employers, already complaining of poor professional preparation of graduates, are afraid that the RPL system may even weaker present professional preparation of graduates.

This was found during interviews conducted in the framework of research on the preparation of standards for education and training services in the Malopolska province.

1.5.3 The financial aspects of the recognition of qualifications acquired outside formal education

It must be clearly emphasized that the acceleration of the process of building the National Qualifications Framework and qualifications recognition, is strongly correlated with the availability of European funds for this purpose, under the operational program Human Capital. The money is used in two ways: to finance a large part of the expert work, as well as to conduct extensive promotional campaign (mainly in relation to NQF) and training.

In Poland, most of the formal education services are free of charge, but since the early 90s at all levels of education, formal education is also provided by various private (commercial sector) and social (non-governmental sector) schools. In this type of institutions, formal education is partly or fully paid.

At present, Poland does not have any rules on the financing of services related to the recognition of qualifications. The cost of the procedure (e.g., recognition of diploma) is paid by the applicant (who is applying for the recognition of qualifications) or by employer who wants to hire him.

Large companies, mostly branches of multinational corporations, often take care of their employees and organize opportunities to improve their skills and incur the associated costs. Small companies usually pass education costs to employees, they exchange employees or cover the costs of their development in exchange for a commitment to continue working in their company for a period of several years. Most companies for the training of employees use funds from the EU. However activities described above relate to the development of employees, their retraining, not the cost of the recognition of qualifications.

Looking at the existing system we may attempt to simulate the willingness to pay for such services. After 2004, after Polish accession to the EU, attitudes of both employers and training providers and trainees have significantly changed. Generally, the market has been broken for easy availability of funds for the development of human resources. This can be illustrated on the example of post-graduate studies. While before 2004 there was no problem finding customers to pay 100% of the cost of post-graduate studies, whereas after 2004 only post-graduate studies funded by the EU have a chance to be realized. This also applies to qualifying studies, i.e. those whose diploma is

required by law for regulated professions (e.g. teachers). This situation justifies the supposition that

at least in the first period of introduction of RPL in Poland, interested parties - both individuals and employers, will expect that the services associated with the validation and recognition of qualifications will be at least partially reimbursed. Certainly there will not be money in country the budget for this task, so it is necessary to give interested parties possibility of applying for EU funds.

It should also be noted that the expansion of such services may constitute an additional source of revenue for the organizations authorized for carrying out the procedures for recognition. In particular, in case of universities, this could be the income from individual accreditation processes, carrying out the procedures for the accreditation of training programs in companies, their evaluation and issuing of documents certifying compliance with standards, and also the admission of students who would pay for additional modules necessary to issue the certificate.

1.5.4 Stakeholders involvement

A serious problem of the Polish education system is weak link of education with labor market needs. It is very difficult to solve this problem, despite many efforts, mainly due to the high dynamics of the needs of labor market and limited possibility of changes predictions. This is particularly a problem of higher stages of education, because this phenomenon is supported by the following mechanism: academics and universities, for whom scientific criticism and importance of scientific achievements, as well as meeting the formal conditions of training, are the most important aspects of assessing the quality of their work, are not subject to verification in terms of meeting the labor market needs. This causes that professional orientation is marginally treated in the learning process, sometimes even as depreciating the status of education in the university, and graduates are poorly prepared for meeting the labor market needs. As a result, an increasing number of trade associations recognizes a secondary school or university diploma as a necessary but not sufficient condition to gain authorization to practice. The necessary, required conditions are mostly: several years of professional practice, courses and passed tests to prove qualifications. Also, there are many specialized training companies in the field of HR, which, in relation to the development of certain

capacities gain a strong position. This is paradoxical, because often trainers and people who confirm qualifications , are representatives of the formal system and – from formal education point of view - can not recognize these qualifications.

Linking education with labor market needs is also difficult because of the very low level of involvement of stakeholders, including **entrepreneurs and employers**. Integration of stakeholders is mostly managed by **public administration**: driven by public offices or by public agencies and is strongly associated with public sector. The main actors are: Prime Minister's Office, ministries of Science and Higher Education, Economy and Education and the Bologna Experts Group – which performs both the role of promoters and experts. In recent years, also the Institute for Educational Research (IBE) is involved as one of main stakeholders. The Institute coordinates the work of experts, inviting (at their own expense - thus excluding) the various professional groups and experts. IBE also subcontracts various expertises. There is a lack of partnership in developing a new system. At the level of higher education process is definitely monopolized by the environment of Bologna Experts.

General lack of cooperation of experts, representatives of the formal education and higher education, non-formal education and employers and public administration seems to be the biggest weakness of the process of RPL implementation.

It is worth to refer at this point to the results of research and peer learning seminars organized by the European Commission under the Open Method of Co-ordination for support of the development of LLL. According to above mentioned research, the most important critical factor in the construction of LLL policy and its implementation is partnership of all interested stakeholders [Critical, 2010]. It should be noted that

partnership in Poland is understood in a very narrow way, as the inclusion of experts and relying on their studies, and also consulting already prepared solutions with the different stakeholders in the process of formal consultation (required by law). There are no platforms of cooperation, which allow to work out joint solutions satisfactory for all stakeholders.

This understanding of the partnership results in the development of a number of undesirable attitudes:

- Very strong employers' distance from this environment, which is rather a fan and reviewer of this work. However, without understanding the idea of change and strong support from employers and their involvement in the implementation, the process seems to have no chance of success.
- increase of demanding attitudes of learners who want to be taught to, to get specific learning outcomes, while minimizing responsibility for their own learning.
- A large reserve of schools and universities due to lack of support system for teachers and academics, which is necessary in case of the necessary changes to the way where education is understood as a moderating process of learning, competence development of the learners, as well as validation of qualifications acquired in different contexts of life (including through work) and their recognition in the process of formal education.

It is a mistake not to support the regional initiatives undertaken by local government associated with the construction of regional partnerships in the labor market (e.g. Małopolska initiative).

A very important change in formal education in Poland is the principle of practical learning outcomes. Ministry of Education has taken the initiative to enter into agreements with employers' organizations and non-governmental organizations. Similar agreements are formed at the regional and local levels, what is encouraged by the new Graduates Practices Act (which includes students who are graduates of secondary schools (ISCED 3-6). Schools in Poland are also developing a system of career counseling.

Particular emphasis shall require actions undertaken in higher education for better match between education and labor market needs. Since 2008, the Ministry of Science and Higher Education orders and additionally finances university training courses (especially technical studies), which graduates are the most needed by the labor market. The new law makes it possible to order training by employers and to prepare and implement higher education courses together with employers. It also introduces an obligation of at least 1-2 semesters of industry training for the education of professional profile and abolishes central list of fields of study. Schools were given greater autonomy in education. Increase of the autonomy of educational institutions must be associated with increased social responsibility. Curriculum self-defining through precise definition of

learning outcomes was therefore connected with obligation of internal quality assurance systems, assessment of the declared effects and monitoring of the fate of the graduates implementation. Flexible shaping of the educational profile is possible now. Also, the process process of differentiation of schools by type of shaped skills has begun.

A specific group of stakeholders are the **experts**. A special role in the modernization of the Polish system of education and training play experts, especially the Bologna Experts mentioned above. The first large-scale projects, which prepared the assumptions of future system had been conducted by them in 2008-2010. At the time Polish Qualifications Framework (coherent with the European Qualification Framework) model and guidelines for its implementation were prepared. Polish Qualification Framework was then used in the updating of the LLL strategy in Poland, as well as amendments to laws on higher education and vocational training. Since July 2010 another expert project is implemented by the Institute for Educational Research. Project goals are e.g.: to prepare a proposition of legal regulations for the implementation of Qualifications Framework, to design structures of institution which will coordinate and monitor implementation of QF, to prepare a concept of National Registry of Qualifications and the National Qualifications Framework portal (Krajowy System, 2011, 4-5).

An important environment for the development and recognition of qualifications is a sector of **training organizations** (both commercial companies and NGOs). This is a significant sector - only in the non-government sector number of active organizations is estimated at about 16 thousand (Zbieranek, 2011, 10). Their development will continue, not only because they are able to quickly and flexibly fit to the needs of environment, but also because of knowledge society development, organizations based on intellectual capital will be more and more popular.

Training companies are very diverse environment. There are both commercial organizations and NGOs, with a rich offer, or narrowly specialized training services, with an established market position and financial stability, as well as those that exist only thanks to the European Social Fund. However, we can say that training companies play an important role in the transformation of the education sector in Poland. Thanks to them there is a transfer of innovative teaching methods and techniques. Training companies also support development of soft skills, which, as noted by P. Zbieranek (2011, p.13), differ from traditional, school way of understanding education and refer to such competencies as creativity and innovative problem solving, critical analysis of information or team working. P. Piasecki (2011, p.33) stresses that the main strength of training companies is their mobility and focus on specific areas of competence, short forms of work and active teaching

methods. At the same time the industry is facing a problem of different quality of service and lack of training qualifications of the trainers.

Training companies see opportunities for cooperation with the formal education sector, but with a large distance refer to the proposal for the creation of the formal recognition of qualifications obtained on an informal or non-formal basis. According to P. Piasecki (2011, p.33), who for many years served as president of the Polish Chamber of Training Companies, in the coming years we should expect, due to state fiscal policy, that some companies will be pushed out of the training market by educational institutions and universities. Generally training companies, despite the declared openness to cooperation with universities, rather keep the distance in terms of cooperation. Schools, especially higher education schools, ignore this sector, even when they create their own units of this nature (for example, Wszechnica – the Jagiellonian University training centre). In most cases such units are treated as charities.

Concluding reflections on the validity and the de facto lack of cooperation between stakeholders in educational processes, it is worth to cite one from the 11 strategic directions of intervention provided for the realization of objective: "The working environment and community involvement aimed at promoting adult learning", described in document of government policy towards LLL (Perspektywa, 2011). It assumes "Developing a partnership of ministries, local governments, employers, employees, community organizations for education of citizens."

De facto cooperation of stakeholders in education does not exist. It is declared in recent years, legally enforced in the formal education institutions. Lack of experience of positive cooperation will be an additional difficulty in the work on the design and implementation of recognition system.

Without the creation of mechanisms which stimulate cooperation focused around widely shared vision of a learning, open society, constantly raising their qualifications, flexibly shaping the path of personal and professional development for the benefit of personal goals, society and the economy, there is no chance to develop a reliable system of recognition. We must begin with focusing on cooperation, identification of stakeholders' concerns and goals.

1.5.5 Quality assurance

In LLL policy, to ensure the quality of learning outcomes is a critical element. Especially important are: the internal systems of quality assurance and support for teachers and trainers and a system of external evaluation of learning outcomes achieved.

In Poland, an external evaluation system with great success has been implemented at the level of 1,2 and 3 of ISCED classification, namely: elementary school, middle school, vocational school and high school, and for doctors and lawyers (7 level acc. ISCED 2011) (International Standard, 2010). Comparability of results is achieved by the standardization of requirements, examination tools, procedures, criteria, and conducting examinations throughout the country at the same time. In higher education, in 2011, system of accreditation of schools and departments of education has been partially changed, by stronger connection between rates and the level of achieved outcomes and existence within higher education institutions internal quality assurance systems.

However, there are no quality assurance systems for education services outside the formal system of education.

In the draft proposal of National Qualifications Framework, quality assurance is recognized as a key component, which assures its credibility to all system's participants (KRR, 2011, p.7).

Because of the general character of the above mentioned NQF project, quality issues, however considered as a key component of the system, are not precised, expressed in the form of intention, as a condition of effectiveness of the system and a critical factor. Unfortunately, in the NQF project, in relation to the qualifications recognition, these issues were not discussed.

1.5.6 Information availability

The public debate over the modernization of the education and training does not include the issue of recognition of qualifications acquired outside the formal system. Pilot surveys carried out by the authors of this study show that, except for Bologna Experts, none of Polish stakeholders has knowledge of existing systems for the recognition of qualifications obtained outside the formal

education. Since information on the RPL appears in different contexts, it raises big emotions, and it's often misunderstood and immediately discredited. In the Act of 4 September 1997 on government administration (Dz.U. z 2007, nr 65, poz. 437), Art. 26, paragraph 2 states that "The minister responsible for higher education coordinates the recognition of qualifications in regulated professions and activities and take steps to share information on the recognition of these qualifications." This is the only document which identifies the body responsible for sharing information about qualifications recognition and this applies only to regulated professions.

Lack of information about the essence of RPL, benefits for individuals, employers, schools and training organizations, the boundary conditions of these services, systems of RPL quality assurance, is one of the most important critical factors for implementing this system in Poland.

1.5.7 Promotion

In Poland, a lot of attention and resources is devoted to the promotion of NQF. Unfortunately, the focus was put more on technical than on the ideological side of NQF. The concept of National System of Qualifications, which consists of NQF, qualifications registry, validation, recognition and accumulation and transfer of credited achievements is poorly known. Promotion of RPL is a necessary condition for the success of RPL implementation in Poland. These activities should be directed both to the environment of higher education, especially teachers, senates, university management, students as well to employers, workers and training companies. At this stage it is primarily important to introduce clear rules of RPL to the National Qualifications System. It is also important to finish speculations and to provide information what RPL really is, what kind of opportunities and possibilities it creates and what limitations it has.

1.5.8 RPL service providers

Since many years, Polish institutions of higher education support the learning process of adults. Next to postgraduate studies, third-age universities, universities for children, open universities, there are also interesting proposals for people with higher education degree who wish

to retrain. Higher education institutions offer certified courses which guarantee specific learning outcomes (e.g. Wszechnica at the Jagiellonian University). It seems that universities should be recognized as main RPL service providers, at least at the beginning of RPL process implementation. Universities should not monopolize RPL services, however, as for today, they seem to have proper human resources (qualified staff) for managing RPL.

At the moment we do not have any formal documents which describe neither requirements to become a RPL service provider, nor quality assurance policy for RPL service providers.

1.5.9 Other

Quality assurance systems function well in Poland. A major achievement is the development of an updated national strategy in this regard - "The perspective of learning throughout life" (February, 2011). The weakest link of Polish Lifelong Learning policy is the construction of the system of recognition of qualifications obtained outside the formal system. It is also a critical element of this policy, which means that without its implementation it will not be possible to build a coherent Lifelong Learning system. A major problem is also to build a coherent system of assessment of learning outcomes, defined as the real level of achieved competences. Standardization of educational outcomes achieved in different ways and in different places and their careful evaluation will enable elimination of the formal education system monopoly.

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