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TOWARD A CONVERGENCE OR DIVERGENCE OF ADULT LEARNING AND EDUCATION POLICIES?

RECOGNITION OF PRIOR LEARNING IN GERMANY AND INDIA

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ABSTRACT

In this paper we draw on the theoretical perspective of new institutionalism, particularly on that of world culture and world polity, and discuss the influence of policies of three selected international intergovernmental organisations (IIOs) concerning the recognition of prior learning (RPL) on adult learning and education (ALE) policies, of which RPL is a part, in one developing country from the global South (India) and one developed country from the global North (Germany). Based on a comparative analysis of two country cases, we show that there is evidence of a worldwide convergence of ALE policies as IIOs play a crucial role in the formation and dissemination of European and/or global RPL policies that are based on similar standards. However, it is also evident that this does not indicate a wholesale implementation and adoption of policies, especially in local environments.

KEY WORDS

adult learning and education; Germany; India; international intergovernmental organisations; recognition of prior learning

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Convergência ou Divergência das políticas de Aprendizagem e Educação de Adultos? O Reconhecimento de Aprendizagens Experienciais na Alemanha e na Índia

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RESUMO

Neste artigo, inspiramo-nos na perspetiva teórica do novo institucionalismo, particularmente na da cultura mundial e da constituição política mundial, discutindo a influência das políticas de três organizações internacionais governamentais (OI) escolhidas relativamente ao reconhecimento de aprendizagens experienciais (RAE) nas políticas de aprendizagem e educação de adultos (AEA), das quais o RAE faz parte, num país em desenvolvimento do hemisfério sul (Índia) e num país desenvolvido do hemisfério norte (Alemanha). Com base na análise comparativa dos casos de dois países, mostramos que existem provas de uma convergência mundial das políticas de AEA enquanto as OI têm um papel fundamental na formação e divulgação de políticas de RAE europeias e/ou globais que se baseiam-se em *standards* semelhantes. No entanto, também é evidente que isto não indica uma implementação e adoção generalizada de políticas, principalmente em contextos locais.

PALAVRAS-CHAVE

aprendizagem e educação de adultos; Alemanha; Índia; organizações internacionais governamentais; reconhecimento de aprendizagens experienciais

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¿HACIA UNA CONVERGENCIA O DIVERGENCIA EN LAS POLÍTICAS DE APRENDIZAJE Y EDUCACIÓN DE ADULTOS? RECONOCIMIENTO DE APRENDIZAJES DE LA EXPERIENCIA EN ALEMANIA E INDIA

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RESUMEN

En este artículo, nos inspiramos en la perspectiva teórica del nuevo institucionalismo, particularmente la de la cultura mundial y la constitución política mundial, discutiendo la influencia de las políticas de tres organizaciones intergubernamentales internacionales (OII) elegidas en relación con el reconocimiento de aprendizajes de la experiencia (RAE) en las políticas de aprendizaje y educación de adultos (AEA), de las que RAE forma parte, en un país en desarrollo del hemisferio sur (India) y en un país desarrollado del hemisferio norte (Alemania). Con base en el análisis comparativo de casos de dos países, mostramos que existe evidencia de una convergencia mundial de políticas AEA, mientras que las OII tienen un papel fundamental en la formación y difusión de políticas RAE europeas y/o globales que se basan en estándares similares. Sin embargo, también es evidente que esto no indica una implementación y adopción masiva de las políticas, particularmente en entornos locales.

PALABRAS-CLAVE

aprendizaje y educación de adultos; Alemania; India; organizaciones intergubernamentales internacionales; reconocimiento de aprendizajes de la experiencia

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Toward a Convergence or Divergence of Adult Learning and Education Policies? Recognition of Prior Learning in Germany and India

Borut Mikulec[1], Shalini Singh, Jan Schiller, Devaraj Balappagari, Syed Tauseef Ahmad Tirmize

INTRODUCTION

The role of international intergovernmental organisations (IIOs) in global and/or European adult learning and education (ALE) policymaking has received significant attention in the field of ALE in the twenty-first century (see, for example, Field, 2018; Milana, 2012; Webb, Holford, Jarvis, Milana, & Waller, 2015). However, empirical studies that examine the impact of different policies of IIOs on country-level ALE policies and practices are still scarce, and there is still much to be learned about the travelling of policies from IIOs to the national level and the real implications of underestimating or overestimating the influence of IIOs on country-level ALE policies (cf. Crossley, 2019; Jakobi, 2012; Steiner-Khamsi, 2012). Therefore, the main aim of this paper is to discuss and analyse the influence of policies of three selected IIOs – the European Union (EU), the United Nations Educational, Scientific and Cultural Organization (UNESCO), and the International Labour Organisation (ILO) – concerning the recognition of prior learning (RPL) on ALE policies, of which RPL is a part, in one developing country (India) and one developed country (Germany). For this purpose, this paper will explore the following research question: How do international and national ALE and RPL policies support and frame RPL arrangements in Germany and India?

In the following, we will first briefly introduce the role of IIOs in ALE policymaking and discuss IIO policies on RPL. We will then outline our methodological approach and provide an analysis of German and Indian RPL policies in line with the main aim of the paper. In the final section, we will discuss the identified similarities and differences. We will argue that there is evidence of a worldwide convergence of ALE policies; IIOs play a crucial role in the formation and dissemination of European and/or global RPL policies that are based on similar standards. However, the discussion of two country cases will show that policy change must be implemented in local environments. This means that IIO agendas are mediated by local contexts in which the RPL norm has not been internalised in the practice of both countries.

THE ROLE OF IIOS IN ALE POLICYMAKING

Due to globalisation processes, IIOs are playing an increasingly crucial role in the formation of global ALE policies. They have been identified as 'central nodes for policy diffusion' and are able to transfer policies between countries (Jakobi, 2012, p. 391). As

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discussed by scholars in the field (Barros, 2019; Breyer & Schemmann, 2018; Field, 2018; Holford, Milana, & Mohorčič Špolar, 2014), educational policy has become internationalised and a product of IIOs (e.g. UNESCO, the EU, the ILO, the Organisation for Economic Co-operation and Development (OECD), and the World Bank) that have a global or continental reach. They strive to promote precisely defined discourses and policies in the field of ALE, although their formal competencies are generally limited. This means that ALE is increasingly integrated into complex relationships between the supranational and national levels as an exchange of policies between global networks of people, ideas, and practices. In addition, IIOs are influential actors that frame ALE and lifelong learning (LLL) policies, and they are changing ALE policies and promoting policy transfer: towards evidence-based educational practices, the measurement of the effectiveness of education, and goals relating to competitiveness and employability in the twenty-first century. Moreover, IIOs are promoting new instruments and practices of governance based on knowledge and data generation, peer learning, benchmarks, indicators, monitoring, evaluation and funding. These are directed towards output governance models (Ioannidou, 2014; Lawn & Grek, 2012). However, the focus and scope of IIOs in relation to ALE and LLL policies differ as well (see Jakobi, 2009; Mikulec, 2021).

IIOs are agenda-setters. They address political challenges on a global level and create global public policies. They stimulate transnational *policy transfer*[2] through best practices or international standards and evidence-based policy (Steiner-Khamsi, 2012, p. 6), whereby educational policy transfer 'encompasses ideas, ideology, practices and institutions, involving multiple actors' (Crossley, 2019, p. 178). The process of policy transfer is best understood as a continuum that can incorporate various influences, from voluntary to more coercive examples (i.e. policies that are forcibly imposed on countries or that countries must adopt on account of political pressure), and influences from IIOs (by receiving funding, or because of signed conventions or treaties) (see Portnoi, 2016, pp. 152-153).

Furthermore, from the theoretical perspective of new institutionalism, and particularly that of *world culture* and *world polity* (cf. Jakobi, 2009; Meyer, 2005; Meyer, Boli, Thomas, & Ramirez, 1997; Portnoi, 2016), the global policy developments of IIOs which foster policy transfer are causing a worldwide convergence of educational policies. World culture theory claims that there is one world culture that is built on Western ideals and cultural values (e.g. universalism, democracy, progress, equality, and justice), to which all states subscribe – for example, education represents one of the components of world culture – and that IIOs and other global governance institutions play a crucial role in the diffusion of world culture. This tendency 'to create similar structures and policies based on worldwide standards and norms' (Portnoi, 2016, pp. 67-68) is called isomorphism and assumes the convergence of (educational) policies throughout the world. Furthermore, this theoretical perspective recognises that '[w]orldwide models define and legitimate agendas for local actions, shaping the structures and policies of nation-states' (Meyer et al., 1997, p. 144), which means that educational 'agendas are set and policies are proposed in the global sphere, while policy change is implemented on the national level' (Jakobi, 2009, p. 45).

[2] Policy transfer with substantial history, as Crossley (2019, p. 178) explains, relates to different conceptual frameworks, such as the Dolowitz and Marsh continuum perspective, Philips and Ochs's four-stage dialectic typology, and Jakobi's global governance institution conception. Policy transfer appears under different terminological conceptions in different disciplines, such as 'policy adoption', 'policy implementation', 'policy borrowing', 'policy lending', 'policy convergence', 'policy learning', and 'policy diffusion', which differ from each other as well as overlap (for an overview of conceptual clarifications related to policy transfer, see Jakobi, 2012, p. 394). Therefore, policy transfer is an 'all-encompassing term' used by scholars from different disciplines 'to describe the processes through which policies travel' and move across borders, 'regardless of whether they are lent, borrowed, or imposed' (Portnoi, 2016, p. 149).

Furthermore, the convergence of educational policies by IIOs is further performed with the help of some or all of the following instruments, which can influence national policy development as discussed by Jakobi (2009, pp. 34-36): (a) discursive dissemination (establishing ideas for national agendas), (b) standard setting (recommendations, benchmarking, explicit aims), (c) financial means aimed at eliciting specific behaviour (establishing programmes or institutions), (d) coordinating functions (instruments of surveillance monitoring progress toward policy aims), and (e) technical assistance that enables states to achieve set policy aims.

However, while IIOs represent crucial actors in establishing world polity, i.e. global public policies and organisational structure for state representatives, as well as central platforms for the dissemination of policies, their 'impact on implementation is less obvious' (Jakobi, 2009, p. 31). There are several reasons for this. The implementation of policies is dependent on a country's political system and the intervention of international policies; formal structures can be subject to isomorphism, but organisational practices do not support this development (i.e. there is no internalisation of norms); implementation is not supported by other domestic actors, such as nongovernmental organisations and epistemic communities; policies may be adopted for reasons of legitimacy and modernity, without having any actual added value for a particular state; the global policy solutions are not applicable to a recipient country (Jakobi, 2009). Finally, from a world polity perspective, the policies of IIOs can, but do not have to, cause a change in domestic policies.

Following the argument about the worldwide convergence of educational policies, we will now turn to a discussion and analysis of the RPL policies of selected IIOs.

RPL POLICIES OF IIOS

RPL has recently become a relevant factor in ALE policies in EU countries and around the globe (Guimarães & Mikulec, 2021; Singh, 2015). In this paper, we use the concept of RPL—i.e. the idea of recognising prior learning wherever and whenever it took place—although other concepts and conceptions are known under the acronyms of APEL (accreditation of prior experiential learning), PLAR (prior learning assessment and recognition), VPL (validation of prior learning) and RVC (recognition and validation of competences), which were developed in different locations and by different actors (see Andersson, Fejes, & Sandberg, 2013, p. 405).

The establishment of arrangements for RPL around the globe can be seen as one of these influences of IIOs[3] which support the shift towards LLL, the outcome dimension of learning, and learning outcome-based standards, curricula and qualifications (Mikulec, 2017). Moreover, the recommendations of IIOs about the governance of RPL emerged with the 'explicit purpose of increasing "effectiveness" and improving levels of national qualifications' (Barros, 2019, p. 54). Three IIOs that issued RPL policies, set clear recommendations for member states, and also worked mutually in their policy efforts are: (1) UNESCO (2012), which issued *UNESCO Guidelines for the Recognition, Validation*

[3] However, RPL as a form of provision can be traced from the 1940s in the USA, the 1950s in Norway, and the 1980s in Canada and France (Bohlinger, 2017, p. 590; Maurer, 2021, p. 475), while the RPL policies of some countries as well influenced the RPL policies of IIOs, such as France and Portugal in the case of the EU (see Guimarães & Mikulec, 2021, pp. 110-111). Furthermore, while the central idea of RPL in the 1970s was related to achieving greater social justice, this discourse in the 1980s and 1990s changed focus toward economic development, also under the influence of some IIOs and their policies (see Andersson et al., 2013, pp. 406-407).

and Accreditation of the Outcomes of Non-formal and Informal Learning, (2) the EU (Council of the European Union [CEU], 2012), which issued *Council Recommendation of 20 December 2012 on the validation of non-formal and informal learning*, and (3) the ILO (2015), which issued *Recognition of prior learning: Key success factors and the building blocks of an effective system*.

In what follows, we will briefly present selected IIOs in relation to ALE and analyse their RPL policies through: (a) main rationale, (b) aims, (c) procedures, (d) principles, and (e) stakeholder ownership.

UNESCO'S ROLE IN ALE AND ITS GUIDELINES ON RPL

UNESCO was established in 1945 to promote peace, security, and human welfare through education, science, and culture. It represents 195 states and 8 associated members, has global reach, and can be considered the most dedicated IIO in terms of policy advocacy, partnerships, and collaborative action in ALE (Milana, 2012; Németh, 2015). UNESCO is a 'complex organisation' that has no mandate to implement actions without broad consensual agreement between its member states and institutions (Németh, 2015, p. 167). Historically speaking, UNESCO promoted social-democratic and liberal ideas in the 1970s and its humanist orientation was still articulated in the mid-1990s. However, in the twenty-first century, neoliberal ideas (i.e. focusing on outcomes, skills, and upskilling) have pervaded its policies (Field, 2018; Milana, 2012; Milana, Holford, Hodge, Waller, & Webb, 2017). Its main roles in ALE are to foster a normative vision of ALE through policy documents; raise awareness through conferences; promote intellectual cooperation through discussion; and develop technical cooperation through expert missions, financial support, and similar measures (Németh, 2015, p. 166).

In UNESCO, RPL has been on the agenda since the UNESCO General Conference in 2005, and it is linked to discourse on LLL (Singh, 2015). RPL is defined as 'a practice that makes visible and values the full range of competences (knowledge, skills and attitudes) that individuals have obtained in various contexts, and through various means in different phases of their lives' (UNESCO, 2012, p. 8). According to the UNESCO guidelines on RPL (UNESCO, 2012), the main rationale for the development of an RPL system lies in making LLL a reality (RPL is to be a key component of a national LLL strategy), to 'assist Member States in developing or improving structures and procedures' of RPL, and to 'develop a common understanding of' RPL (pp. 3-4). The aims of RPL, which are linked to the recognition of learning outcomes of non-formal and informal learning, are: to improve 'individuals' self-esteem and well-being', to stimulate their 'further learning' and mobility within education, and to strengthen 'their labour market opportunities' and mobility (p. 3). RPL procedures should 'identify, document, assess, validate and accredit learning outcomes' (p. 5). The main principles are: (a) equity and inclusiveness in access to learning opportunities (every individual should have a right to RPL), (b) equal value of learning outcomes acquired in formal, non-formal and informal learning (based on national standards, national qualifications frameworks (NQF), formative assessments and summative assessments leading to qualifications), (c) the centrality of individuals in the RPL process (including special support for early school-leavers, adults with special learning needs, and workers with low levels of education), (d) the flexibility and openness of formal education towards RPL, (e) quality assurance in the RPL process (including guidance and counselling

services for RPL), (f) the partnership of stakeholders in RPL (pp. 4-5). Finally, stakeholders from different sectors should be involved in 'developing, implementing and financing' RPL systems, which means that their roles and responsibilities are clearly-defined and sufficient financial resources are provided (p. 6).

THE EU'S ROLE IN ALE AND ITS RECOMMENDATIONS ON RPL

The EU, the successor of the European Economic Community, was established in 1993 when the Maastricht Treaty came into force. It has 27 member states. It has a primarily continental European reach and is one of the key agencies contributing to the formation of European ALE policy. Although the genesis of European educational policy can be traced back to 1957, it was not until 1996 – the European year of LLL – that the EU began to devote more attention to ALE (Milana, 2012; Rasmussen, 2014). The adoption of the Lisbon Strategy in 2000 marked the starting point in establishing a European educational policy defined by common goals, implementation tools, and financial resources, although EU formal competencies in the field of education were limited by the subsidiarity rule (Rasmussen, 2014). For the purpose of formulating and maintaining European ALE policy, which is shaped by various public and private actors and conceptualised as the human capital and vocational perspective of LLL (Mikulec, 2018), the European Commission (EC) adopted an open method of coordination (OMC). The OMC was introduced to improve the effectiveness, coordination and measurability of the outcomes of various LLL policies. It is exercised in the form of 'soft law' (e.g. recommendations, guidelines, resolutions, etc.) and implemented via established networks (Lawn & Grek, 2012). Accordingly, the EU strives to establish monitoring mechanisms through benchmarks and indicators at the European level, to measure and compare the progress of member states, and to disseminate desirable ALE ideas and concepts.

In the EU, RPL has been on the agenda since the Memorandum on Lifelong Learning in 2000, and it is linked to discourse on LLL (Andersson et al., 2013; Guimarães & Mikulec, 2021). RPL is defined as 'a process of confirmation by an authorised body that an individual has acquired learning outcomes measured against a relevant standard' (CEU, 2012, p. 5). According to the EU's recommendations on RPL (CEU, 2012), the main rationale of RPL is that member states establish, 'no later than 2018', appropriate arrangements for RPL which enable adults to: (a) have their knowledge, skills and competences 'acquired through non-formal and informal learning validated', and (b) obtain (full, partial) qualification on the basis of RPL (p. 3). The aims of RPL are: better 'employability and mobility', increased 'motivation for lifelong learning' and enhanced 'competiveness and economic growth' (p. 1). RPL procedures should include the identification, documentation, assessment and certification of learning outcomes. The main principles are: (a) RPL arrangements are linked with the NQF, quality assurance measures and credit system, (b) information, guidance and counselling are available to adults and organisations and (c) for 'skills audits' of unemployed adults as well, (d) RPL is based on standards equivalent to the standards used in formal education, and (e) EU transparency tools (e.g. Europass, Youthpass) are used for the documentation of learning outcomes (pp. 3-4). Finally, stakeholders from different sectors should be involved in the promotion and coordination of RPL arrangements.

THE ILO'S ROLE IN ALE AND ITS SUCCESS FACTORS OF RPL

The ILO was established in 1919 and is the oldest organisation in the United Nations (UN) system. It has a unique tripartite structure that brings together the governments, employers and workers of 187 member states and aims to set labour standards, develop policies and devise programmes that promote decent work (ILO, 2021; Jakobi, 2009). Educational policy is not a central activity of the organisation. Although it has been linked to discussions about LLL since the 1970s, it mainly focusses on work and employment. The ILO supports several forms of ALE, especially those related to paid educational leave, human resource development, vocational training, NQFs and RPL (Jakobi, 2009, p. 89; Maurer, 2021, pp. 476-477).

In the ILO, RPL has been on the agenda since the ILO Recommendation on Human Resources Development from 2004 and is linked to the discourse of skills recognition (ILO, 2015). RPL is defined as a process to 'identify, assess and certify a person's knowledge, skills and competencies – regardless of how, when or where the learning occurred – against prescribed standards for a part (modular) or full qualification' (ILO, 2015, p. 3). According to the ILO's success factors of RPL (ILO, 2015), the main rationale of RPL development is that, due to the 'lack of appropriate qualifications', RPL is seen as an appropriate tool that can help adults to 'acquire a formal qualification that matches their knowledge and skills' (p. iii). The aims of RPL are to contribute to 'improving employability, mobility, lifelong learning, social inclusion and self-esteem' (p. iii). The RPL procedures are: 'counselling and facilitation, and assessment and certification' according to the standards of qualifications (pp. 6-7). The main principles are: (a) effective vocational guidance and counselling as well as an institutional framework for RPL should be established, (b) RPL policy should be part of education and training policy, (c) occupational standards and qualification standards should be closely matched, (d) 'efficient assessment tools and methodologies' should be developed, (e) an RPL system should be quality assured, and (f) an effective monitoring and evaluation system should be established (pp. 29-30). Finally, all stakeholders from different sectors should be involved in the 'development, implementation and evaluation of RPL' and sustainable funding should be provided (p. 30).

TOWARDS A CONVERGENCE OF RPL POLICIES

By summarising the discussion of IIOs' policies on RPL, as well as by acknowledging the new institutionalism perspective from which we can understand LLL (Jakobi, 2009) and RPL (Maurer, 2021) as being part of a world culture disseminated by IIOs, we can point out that: (1) IIOs play crucial role in the formation and dissemination of European and/or global RPL policies that are based on similar standards – i.e. aims (employability, mobility, motivation for LLL), procedures and principles (RPL based on learning outcomes and linked to the NQF, quality assurance, qualifications/occupation standards) – and member states should align with these ideas and norms (cf. Bohlinger, 2017, p. 590); (2) IIOs tend to influence national ALE and/or RPL policies and to stimulate policy transfer through the instruments that IIOs use; and (3) IIOs support the 'credential/credit-exchange' model of RPL that is used for credits and/or qualifications (see Guimarães & Mikulec, 2021, p. 113).

While we have shed light on the basic ideas of RPL policies that are proposed by IIOs in the global sphere, we will further explore the transfer of RPL policies by IIOs onto national levels in two countries.

METHODOLOGY

For a comparative empirical analysis of RPL, we have chosen Germany and India, one developing Asian country and one developed European country (also an EU member state). One is from the global North and one from the global South, but both are member states of UNESCO and ILO. These countries have different histories, welfare regimes, governance structures and ALE systems (which we will further examine in the next two chapters). While ALE is on the whole less regulated than other parts of the education system in both countries, responsibilities for its legal regulation, the public recognition of its providers, and their basic funding rest mainly with the sixteen states (*Länder*) in Germany and the centre and the states in India.

In our comparative analysis, we juxtaposed two national cases following Egetenmeyer's (2020) proposed steps of descriptive and analytical juxtaposition (data collection, searching for common features) and analytical interpretation. Three different comparative categories were developed to guide our comparison: (a) RPL policy framework, (b) RPL procedures and principles, and (c) stakeholders involved in RPL. The comparative categories reflect both the role of IIOs in ALE policymaking and their pursuit of convergence as well as the reasons for their lesser impact in practice as discussed above. They also allow for the operationalisation of our conclusions in terms of a juxtaposition of available data from both country cases.

With regard to the selection of sources, we chose core official national ALE policy documents, official policy documents and RPL reports, RPL policy documents and reports from international organisations, as well as scientific journal articles on RPL in Germany and India in order to improve the reliability and objectivity of the comparisons made. Moreover, as natives of Germany and India, we are knowledgeable about the political context and ALE in both countries.

GERMANY

Germany has the largest economy in the EU and plays a vital role in EU policymaking. This results in a rather strong relationship between EU and German policies in general. Nevertheless, due to its federal system and a history of corporatist policies, Germany has strong national stakeholders in the field of education. RPL research and development is promoted mostly in the fields of VET and ALE (called 'adult and continuing education') and is related to the EU's open method of coordination in the education sector. One of the primary policy goals of RPL in Germany is to address a shortage of skilled workers (*Fachkräftemangel*). This is a prominent theme in German economic and education policymaking (Herberg, 2019, p. 4).

The German ALE system is the fourth education sector (*Quartärer Bildungssektor*) and is based on structural plurality. It is far less regulated than the other three sectors

of primary and secondary schooling, initial VET, and higher education (cf. KMK, 2019, p. 181). The constitution of the Federal Republic of Germany gives primary responsibility for education and training to the federal states (*Länder*), while the German federation (*Bund*) acts only in certain domains (cf. Ball, 2019, p. 2), mainly formal continuing VET outside of schools and monetary funding of individual learners (cf. KMK, 2019, p. 182). The German ALE system is extremely heterogenous (cf. Gieseke, 2018). Only 14 of 16 states have laws on ALE so far, which refer for example to ILO-promoted paid educational leave (*Bildungsurlaub*). The largest providers are the community-led *Volkshochschulen*, internationally known for their globally active joint association DVV international, but the system also includes single-person trainers and coaches. The system is also shaped by its adjacent sectors, the most important of which is a formal VET system with deep historical roots which follows a holistic approach[4] and traditionally is clearly separated from the formal general education system. Both are influenced by powerful and conservative stakeholders and regulated by separate laws. Although non-formal and informal learning are present in continuing VET[5], recognition and validation are still underdeveloped in comparison to other European countries (Velten & Herdin, 2016, p. 3).

RPL POLICY FRAMEWORK

There is no national formal policy framework for RPL in Germany, although there are numerous initiatives and activities to promote RPL. The holistic approach to occupations is also visible in the basic concept of RPL in Germany. It is widely understood as an overall process that includes four stages: identification, documentation, assessment and certification (cf. Ball, 2019, p. 4). As will be shown, much research and development has been carried out for the first three stages, but certification remains neglected.

RPL has been widely promoted as a concept at the policy level in Germany since the 2000s with the EU's Memorandum on Lifelong Learning. This development gained momentum in the 2010s, following and contributing to the European initiatives on the development of NQFs and RPL arrangements (CEU, 2012, 2017).

The most recent policy document is the 2019 national continuing education strategy (*Nationale Weiterbildungsstrategie*), which includes many of the largest stakeholders: federal ministries, trade unions, employers' associations, standing commissions of federal state ministries, etc. Its main targets are to preserve occupational capacity through adaptive or sustaining qualifications or to enhance them through upskilling qualification, to enable occupational advancement, and to meet the requirements of enterprises for skilled personnel; retraining and second-chance VET are seen as part of continuing VET in this case (cf. Bundesministerium für Arbeit und Soziales and Bundesministerium für Bildung und Forschung, 2019, p. 5). Point 6 in the strategy addresses the visibility and recognition of VET competences of employees, especially those 1.5 million citizens between the ages of 25 and 34 without formal VET certification (Bundesministerium für Arbeit und Soziales and Bundesministerium für Bildung und Forschung, 2019, p. 16). Major aims of the strategy are (a) dealing with the

[4] The German concept of occupation (*Beruf*) refers both to training-related and employment-related constructs (cf. Bundesinstitut für Berufsbildung, 2010, p. 4).

[5] Statistical data from the Adult Education Survey show that participation rates in formal and non-formal learning range between 56-59% and are thus above the EU mean. The data also show that 44-45% of adults participated in informal learning between 2016 and 2018 (see Bundesministerium für Bildung und Forschung, 2019).

aforementioned skilled labour shortage as well as (b) raising the participation of citizens in the labour market and society in general through occupations. RPL is understood as an opportunity to achieve these aims.

RPL PROCEDURES AND PRINCIPLES

In its 2010 report for OECD activity on RPL, the Federal Institute for Education and Research in Germany stated that RPL rarely saw any 'real' recognition in terms of certification and still resided mostly below the regulatory level (cf. Bundesministerium für Bildung und Forschung, 2010, p. 9). The only long-standing RPL procedure for non-formal and informal learning is the *Externenprüfung* (External Students' Examination), which was introduced in the Vocational Training Act of 1969 and 'provides a legally based instrument for the validation of non-formal and informal learning by giving access to the regular (final) examination within the formal VET system without prior formal training' (Ball, 2019, p. 3). It is the only federally regulated procedure for RPL (cf. Bundesministerium für Arbeit und Soziales and Bundesministerium für Bildung und Forschung, 2021, p. 42), although it retains the underlying rationale of curricula-oriented VET, in contrast to the competence-based assessment of equivalency of newer RPL approaches.

The last decade saw a number of initiatives, starting with the development and implementation of the NQF (*Deutscher Qualifikationsrahmen* – DQR) with regard to the European qualifications framework for LLL (EQF). The NQF is designed as a tool for the transparency and translation of qualifications acquired in the complex German educational system in national and European contexts,[6] although there had been plans to include non-formal and informal learning as well. An inquiry to the German government on the advances of RPL from June 2021 (Deutscher Bundestag, 2021) confirms formally that the DQR working group has not achieved the development goals originally set for 2014. Prolonged stakeholder negotiations in the working group delayed the integration of formal education and VET qualifications by several years and resulted in a step-by-step approach to reach consensus (Deutscher Bundestag, 2021, p. 3), without any advances in the integration of non-formal or informal learning CEDEFOP, UNESCO, UNESCO Institute for Lifelong Learning, & European Training Foundation, 2019, p. 221). Limited to a transparency tool, the DQR integration of non-formal and informal learning would need proper validation in the first place (Deutscher Bundestag, 2021, p. 3), rendering the goal of direct integration of non-formal or informal learning into the DQR impossible.

The EU recommendations on RPL (CEU, 2012) initiated more successful developments. The recognition act (*Anerkennungsgesetz*) of 2012 entitles citizens to a review of any foreign VET qualification. If no legal document can be provided, a qualification analysis (*Qualifikationsanalyse*) that includes non-formal or informal competences can be conducted (Bundesministerium für Bildung und Forschung, 2018, p. 3). A factor promoting the development of RPL is the growth of migration to Germany (Windisch, 2020, p. 2).

In 2015, the project 'Qualification-Related Validation of Skills acquired non-formally and informally' (ValiKom) began to provide RPL for competences gained in Germany (Böse, Dietzen, & Eberhardt, 2019, p. 294). Both the recognition act and the Valikom

[6] See https://www.dqr.de/content_en/home.php.

procedure rely on existing initial and advanced training regulations as their underlying standard (cf. Böse et al., 2019, p. 294). Thus, the aim is to assess full or partial equivalency with regular vocational qualifications. The ValiKom project is a 'reference project' (cf. CEDEFOP, UNESCO, UNESCO Institute for Lifelong Learning, & European Training Foundation, 2019, p. 224) and was developed as a standardised validation procedure to be used across all employment sectors that follow the following four steps: (1) information and counselling, (2) documentation, (3) assessment, and (4) certification. The project was operated from 2018 to 2021 as 'ValiKom Transfer' to foster availability of validation opportunities with chambers of commerce and industry, which are the entitled bodies in this case. Although it is the largest cross-sector and cross-occupation initiative, only 28 of 79 chambers of commerce and industry participated by October 2021 and offered validation procedures for only around 30 of over 340 regulated occupations (Bundesministerium für Arbeit und Soziales and Bundesministerium für Bildung und Forschung, 2021, p. 42).

In higher education, RPL gained outside of higher education is regulated by federal state laws on higher education, following recommendations by the Standing Conference of the Ministers of Education and Cultural Affairs of the Federal States (*Kultusministerkonferenz)*. RPL takes place mainly at the university level on an individual basis and is regulated and enforced by the accreditation system (Seger, Waldeyer, & Leibinger, 2017).

STAKEHOLDERS INVOLVED IN RPL

The main stakeholders in the promotion of RPL are the federal institutes for vocational education (*Bundesinstitut für Berufsbildung*) and education and research (*Bundesinstitut für Bildung und Forschung*), among other federal institutions. They provide inventory reports (e.g. Bundesinstitut für Berufsbildung, 2010; Bundesministerium für Bildung und Forschung, 2010; Velten & Herdin, 2016) that are focused on policy development. They act as major funders of research and development projects as well, e.g. for the ValiKom project. In addition, research institutions like the German Institute for Adult Education (DIE) fund and manage projects of their own, e.g. GRETA/GRETA II, which is aimed at competence assessment (formal, non-formal and informal) in the field of ALE.

In practice, the aforementioned research projects provided mostly identification, documentation and assessment tools, while certification remains with the existing stakeholders of the VET system, especially the chambers of commerce and industry (*Industrie- und Handelskammern*), which are responsible for most formal VET certifications in Germany.

INDIA

India is a diverse country with vast economic inequalities. It has a population of about 1.34 billion people. Only 21.2 per cent of the total working population is skilled (UN, 2020). In 2017, 1 per cent of the population received 73 per cent of the total wealth generated that year, and inequalities have increased (Oxfam International, 2017). About 12 million people in India join the workforce every year, and the government has a target

of training about 500 million people by 2022. The existing capacity of skill training/development in the country is poor. This has far-reaching consequences for productivity as well as for the further development of human capital in the country.

Despite the fact that everyone has had a right to basic education since 2009, the schooling situation in India is miserable. A large percentage of the population cannot afford private schooling and is therefore dependent on government schools for access and quality of education. Despite measures like free mid-day meals (to encourage poor students to come to schools), the drop-out rate in India is very high for several reasons, including lack of access, poor facilities, mismanagement, corruption, poor quality control, and different forms of discrimination. In addition, the Indian education system provides limited opportunities for exposure to work environments (provisions were introduced in the new educational policy in 2020 but the policy has not been implemented yet). As a result, early dropouts learn informally. There are a large number of household-managed small-scale enterprises with one to five employees (DEFT Advisory and Research Private Limited, 2014) and a large amount of child labour in India, about 10.1 million cases according to the 2011 Census (Registrar General & Census Commissioner 2014); the situation is likely to become worse due to Covid-19. Added to this, there is a lack of formal education due to issues of access, low returns on investment, high short-term opportunity costs, etc. This has led to a large adult population with few skills and limited pathways for the further integration of such people into the formal education system and high-productivity economy in the long run. The Indian economy is thus characterised by low-skilled, low-paid individuals working in the labour-intensive, unorganised sector, which amounts to about 86-92 per cent of the whole economy. About 80 per cent of India's workforce is employed in the unorganised sector, and around 80 per cent of such workers belong to marginalised sections (DEFT Advisory and Research Private Limited, 2014).

RPL is part of the skills development agenda of the country (Rothboeck, Comyn, & Banerjee, 2018) and may be a possible solution to this situation. It can provide an opportunity for integrating such individuals into the formal economy and can open doors to formal education (see Maurer, 2021, p. 476). Further, RPL is relevant for protecting cultural diversity in traditional crafts and other skills which comprise the social identity of many communities and social groups in India. By recognising these skills as ‘skills’ and by ensuring that they receive acknowledgement in terms of economic returns, RPL may provide an opportunity for social inclusion and sustainability too (Singh & Ehlers, 2019).

RPL POLICY FRAMEWORK

India is a quasi-federal country with a central government and states. Educational policy is the responsibility of the central government. At present, RPL policy is state led and is the responsibility of the Ministry of Skill Development and Entrepreneurship. The current policy was introduced in 2014 and is called the Prime Ministers’ Skill Development Scheme (*Pradhan Mantri Kaushal Vikas Yojana* – PMKVY). The central government and the governments of the states share responsibility for implementation in a 75:25 ratio, where the states can do more if they wish and based on their performance evaluation (MSDE, 2016). Policy aims include: (1) inclusion of those who have lagged behind in the process of development; (2) employability by providing adequate certification and recognition of skills of individuals; (3) adding human resources to the labour market; and

(4) providing visibility to traditional skills and occupational forms by making a provision for recognising them formally (MSDE, 2016).

The Indian policy on RPL has developed in a concrete manner since 2008 under the Ministry of Labour and Employment. Since the very beginning, the focus has been on informal skills and has aimed at inclusion. In 2012, RPL was linked to education. This enabled the standardisation of learning outcomes through formal/non-formal learning and RPL. In 2013, monetary awards were introduced to encourage people to have their skills recognised. However, the policy was fragmented and ineffective, lacked adequate stakeholder engagement and data generation, provided poor quality outcomes, and simply added to the number of unemployed people with recognised skills that are irrelevant for employment (Ummat, 2013). Poor implementation and evaluation further added to a weak RPL policy (Ummat, 2013).

The ILO has been providing technical support and guidance for pilot projects (DEFT Advisory and Research Private Limited, 2014; Rothboeck et al., 2018). It reviewed the Indian policy for skills training including RPL launched in 2007-08 (Ummat, 2013). From 2014 to 2015, the ILO worked with the Indian government, civilian organisations (like Labour Net) and research agencies (like DEFT Advisory Research Private Limited) through pilot projects that preceded the detailed policy guidelines of the Indian government. These projects were executed in sectors like agriculture, health, gems and jewellery, and domestic help, which employed more than half of the Indian workforce (Rothboeck et al., 2018). The project was relevant for developing recommendations for the execution of RPL policies in India (Rothboeck et al., 2018).

In 2015, the policy was made much more coherent with consolidated guidelines issued by the Ministry of Skill Development and Entrepreneurship. Strategic guidelines are issued from time to time to facilitate policy implementation. At present, about 72 per cent of all skill initiatives (the rest being short-term skill development courses) comprise RPL under the Indian skills policy (MSDE, 2020).

RPL PROCEDURES AND PRINCIPLES

India is taking a project-based approach to implementing RPL. This means that initiatives are designed by the providers (state or non-state), who may apply for funding according to the guidelines provided in the implementation strategies. These strategies may change from time to time according to government preferences. At present, there are five types of projects based on location. These include projects (1) in camps for workers in industrial and traditional skill clusters; (2) at employer premises; (3) on demand by local level government committees (District Skill Committees) at government centres; (4) in best-in-class employer-selected locations as per specified criteria; and (5) online. Anyone can use RPL; there is no specific target group. Those who need to polish their skills can take short-term bridge courses.

The RPL process in India has five steps: (1) mobilisation and pre-assessment; (2) screening and counselling; (3) orientation; (4) final assessment; and (5) certification (which is done under the National Skills Qualification Framework (NSQF)). Skills are assessed as qualifications within NSQF with reference to curricula and National Occupational Standards (NOS) formulated by Sector Skills Councils (SSCs) (MSDE, 2021, p. 31). This is accompanied by payments to providers and individuals who use RPL. If an attempt is unsuccessful, reassessment paid by the provider is possible.

The projects are evaluated by public agencies that formulate and bear responsibility for implementation.

STAKEHOLDERS INVOLVED IN RPL

RPL in India has various stakeholders. While policy is formulated by the state (central government), social partners have been given a predominant role in implementation and evaluation. The Ministry of Skill Development & Entrepreneurship provides a policy framework, funding and grievance redress for RPL. The state and the employers/business sector share implementation as well as quality control. Any type of stakeholder (state agency, public, private, etc.) can be a provider if it meets the specified guidelines about infrastructure, credibility, etc. Individuals and employers are the beneficiaries. Those with an RPL certification are likely to earn about 25 per cent more than those without (NSDC, 2020). Therefore, individuals who receive more money and everyone in the economy who benefits from taxpayers and increased spending is a stakeholder indirectly. In addition, the ILO has been involved in technical support and pilot projects and therefore can be considered a stakeholder too (Rothboeck et al., 2018; Singh & Ehlers, 2019).

COMPARISON AND INTERPRETATION

An overview of similarities and differences between country cases is presented in Table 1.

Table 1
Similarities and differences of RPL arrangements in Germany and India

	IIOs	Policy framework	Procedures and principles	Stakeholders
Similarities	RPL arrangements shaped by IIOs' policies and instruments	RPL objectives (economic development) Shared responsibilities (nation/federal states)	Four main steps of RPL procedures Common principles (standards and learning outcomes)	/
Differences	Major role played by the EU in Germany and the ILO in India	In India, social justice is also an RPL objective National policy established (India) and lacking (Germany)	/	Stakeholders of the VET system (Germany) and government with social partners (India) State led and top down (India) and stakeholder led and bottom up (Germany)

Our analysis of the two country cases shows that in both countries in the last two decades RPL arrangements have been shaped by discourses and policies of IIOs. This means that formal structures are subject to isomorphism. However, RPL policies and practices in both countries are also embedded in local contexts related to the specificities of the education and training systems, labour market requirements, and economic situation. Due to the IIOs' discourses and policies on RPL, similar RPL objectives are fostered in both countries, namely the integration of formally unskilled or low-skilled adults into the labour market – especially adults without formal education and/or VET qualification and workers in the low-skilled, unorganised work sector in India and migrants with qualifications that are not recognised directly in formal education or the VET system in Germany – by fostering employability development through RPL and strengthening the national workforce. However, due to its local specificities, RPL in India is relevant also for protecting cultural diversity in traditional crafts that comprise the social identity of communities and social groups (cf. Singh & Ehlers, 2019).

Moreover, there are differences in the extent to which the RPL arrangements of both countries are shaped by the discourses and policies of IIOs. There are also differences in the IIOs themselves and the instruments they use. In Germany, the EU plays a major role among IIOs in shaping RPL arrangements – although ideas from UNESCO about the use of learning outcomes, NQF, quality assurance and occupational standards are highly visible too – and in promoting RPL policy transfer through the following instruments (Jakobi, 2009): the dissemination of ideas through conferences and publications (cf. CEDEFOP, European Commission, & ICF, 2019), standard-setting through benchmarks and indicators (CEU, 2012), and coordination through monitoring reports (cf. Ball, 2019). However, while numerous project-based activities have been implemented to promote RPL, the impact in practice, especially the certification of RPL, is still negligible. This means that organisational practices do not correspond well yet. Policies, principles and stakeholders of the formal-education and VET systems are generally focused on formally certified initial and continuing education and training and will likely maintain this focus.

In India, the ILO has played a role among IIOs in shaping RPL arrangements and promoted RPL policy transfer through the following instruments (Jakobi, 2009): standard-setting through recommendations (cf. ILO, 2015) and technical support through programmes for implementing skills training including RPL (cf. Rothboeck et al., 2018; Ummat, 2013). However, in the recently updated RPL policy (MSDE, 2021), there is no direct reference to the ILO. Furthermore, while we also expected to find more visible references to UNESCO guidelines, no direct references could be found in Indian policies[7]. However, UNESCO ideas on RPL related to the improvement of access to further (formal) learning and strengthening labour market opportunities are highly relevant for the Indian context.

The RPL discourses and policies of IIOs interact with national systems of education and training, which feature shared responsibilities between the federal and state levels in both countries. RPL policies are mainly promoted at the federal level, whereas implementation lies with strong and well-established stakeholders. While RPL is a clearly framed policy in India, Germany lacks a national policy framework and RPL is based more on numerous (project) initiatives. Furthermore, RPL policy in India is state led and top down; the state develops a policy and stakeholders have to follow and implement it. In Germany, on the other hand, RPL arrangements are more stakeholder led and bottom up; policy decisions are usually reached by consensus and negotiated among different stakeholders (cf. Singh, 2015, pp. 160-161).

[7] For a more in-depth discussion about the different roles the ILO and UNESCO played in the diffusion of RPL in developing countries, see Maurer, 2021, pp. 476-479.

The RPL procedures of both countries share four main steps that can be found in the RPL policies of IIOs (although with different names): (1) screening and counselling, (2) orientation or documentation, (3) assessment and (4) certification. Furthermore, in both countries, the reference systems are formal educational/qualification standards from general education or VET and their learning outcomes statements, while both countries as well foster a 'credential/credit-exchange' model of RPL (Guimarães & Mikulec, 2021) which is used (or supposed to be used) to gain qualifications. Therefore, on the level of RPL procedures and principles, a strong convergence of RPL arrangements can be identified in both countries. However, in Indian RPL a preparatory step of 'Mobilisation and Pre-Assessment' is part of the RPL procedure as well and aims to attract certain groups for RPL. This is not the case in Germany as this step is part of educational counselling, which can be provided by different institutions/organisations from state, NGO, and social partners and is independent.

Finally, a mismatch between RPL policy goals and their implementation can be seen in both countries as well. In Germany, the *Nationale Weiterbildungsstrategie*, which is the main policy on RPL, is only able to promote ideas; the NQF initiative for RPL has largely failed, which indicates that the way things are done has yet to change and that the RPL norm has yet to be internalised. Direct impact is seen only in the reference project ValiKom, which has initiated RPL opportunities in various sectors. In India, national policy implementation remains fractured, lacks adequate stakeholder engagement and data generation, and provides poor quality outcomes. This indicates that the RPL norm has not been internalised in practice and is not supported by a wider community of stakeholders, i.e. nongovernmental organisations and epistemic communities (especially private-sector employers, see also Rothboeck et al., 2018, p. 407).

CONCLUSION

In this paper, we examined the role of IIOs in ALE policymaking and IIO policies on RPL as well as how RPL arrangements in Germany and India are framed by international and national ALE and RPL policies. If significant convergence in ALE and RPL policies can be observed worldwide, it is also evident that this does not indicate a wholesale adoption of policies, especially in local practices. We showed, in line with a world culture theoretical perspective, that IIOs play a crucial role in the formation and dissemination of European and/or global RPL policies that are based on similar standards and foster policy transfer through the instruments they use. The debate on RPL, its aims and means is a global one. Our findings are in line with similar research that has used an institutionalism perspective and has shown that LLL and RPL are part of world culture disseminated by IIOs (Jakobi, 2009; Maurer, 2021). From this point of view, we can claim that IIOs clearly foster a worldwide convergence of ALE policies, of which RPL is a part, which are based on similar standards and norms. This means that convergence is accruing primarily at a (global) policy level. By analysing RPL arrangements in Germany and India, we were able to show that – whether it is a high-income, affluent, primarily formal economy like Germany or a middle-income, primarily informal economy like India – RPL has been adopted in terms of policy formulation, among others, through the instruments IIOs use.

Although RPL agendas are set in the global sphere by IIOs, policy change must be implemented in local environments where it can be mediated by local actors and contexts. This means that a wholesale adoption of RPL policies is less likely to happen as the agendas

of IIOs cut across local contexts where they can be reshaped during implementation processes (Mikulec, 2017; Steiner-Khamsi, 2012). This is a recognised observation also from the world polity point of view, which has identified many challenges in the process of implementation of IIO policies in local environments where mediating factors (e.g. national actors, cultural norms) in the countries play an important role in the implementation of policy change. In our comparative analysis we showed, first, that the RPL norm has not yet been internalised in practice in either country. Second, apart from providing opportunities for low-skilled, marginalised target groups in both countries, RPL is set to provide an opportunity for integrating such individuals into the formal economy and to have the skills recognised for those who did not have access to education in India. In Germany, it is more a case of ensuring that people in the labour market acquire skills and knowledge adequate enough to match German occupational standards. Locally mediated RPL arrangements therefore point as well towards a divergence of RPL practices.

AUTHORS CONTRIBUTION

Conceptualization and Methodology: B.M., S.S., J.S.; Investigation: S.S., J.S., B.M., D.B., S.A.T.T.; Analysis and Writing: B.M., S.S., J.S., D.B., S.A.T.T. Resources: S.S., J.S., B.M.

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