

GREEK NATIONAL RECOMMENDATIONS

A. Actions implemented in Greece, in the framework of Council recommendation for the “civil society report”, and propositions on the way validation arrangements must be applied so that they meet the citizens’ needs.

1. General features of the validation arrangements

1.1 Development of a National Validation System of Non-formal and Informal Learning

Outcomes

According to Law 4115/2013 (*Organisation and operation of the National Youth and Life-long Learning Foundation and of the National Organisation for the Certification of Qualifications and Vocational Guidance and other provisions*), the National Organisation for the Certification of Qualifications and Vocational Guidance (EOPPEP) is the national body responsible for the incomes and outcomes acquired through non-formal and informal learning. In particular, the goals of EOPPEP, dictated by the law (N.4115/2013, a. 14) and related to the validation of non-formal and informal learning outcomes, comprise:

- ✓ The development of a recognition and certification system of qualifications acquired through non-formal and informal learning, the certification of these qualifications and their equivalence to the National Qualifications Framework (NQF) levels.
- ✓ The certification of the staff who provide career guidance and counselling services
- ✓ The licensing, control and supervision of the institutions that certify qualifications acquired through non-formal education and informal learning.

Regarding the implementation of the above goals, EOPPEP:

- ✓ Proposes the issue of a regulative framework for the conditions, terms and qualification certification process to the Ministry of Education and Religious Affairs. The framework also caters to issues such as examination system, knowledge-skills-competences assessment and validation. EOPPEP implements the regulative framework, keeps the relevant registries and updates the Electronic Life-long Learning Registry of the Life-long Learning General Secretariat.
- ✓ Proposes the issue of a regulative framework to the Ministry of Education and Religious Affairs for the conditions, terms and licensing process of the qualification certification bodies, licenses these, checks the implementation of the regulative framework and maintains a licensed institution registry.

According to the same law (article 19: Control, Certification, Assessment, Accreditation – Supervision of Institutions and Individuals):

- ✓ The terms and conditions for the certification of the qualifications, acquired through non-formal and informal learning by EOPPEP are -each time- determined by a presidential decree which is issued after the Minister of Education and Religious Affairs and the relevant co-competent Minister's proposition. The process of certifying qualifications acquired through non-formal and informal learning, the knowledge-skills-competences examination, assessment and validation system, and everything else relating to the above, more detailed or technical issues falls under the authority of EOPPEP and is regulated by the same body. To implement the above, a proposition by the EOPPEP Board and a decision by the Minister of Education and Religious Affairs and the relevant co-competent Minister are necessitated.
- ✓ Inspection and qualification certification responsibilities defined in the present law, may be allocated to institutions, which, after being licensed by EOPPEP, fall under the latter's supervision. The terms and conditions for the evaluation, licensing and inspection of all relevant institutions are determined by a presidential decree, issued after a Ministry of Education proposal. The licensing procedures, the necessary documents and everything else relevant to the above, more specialized, technical or detailed issues falling under EOPPEP's authority are all regulated by the Ministry of Education and EOPPEP and published in Government's Gazette.

The legally defined goals of EOPPEP are reflected onto the roles and operation of its separate Directorates. In particular, the Qualifications Certification Directorate is included in EOPPEP's organizational structure as a distinctive unit (article 28: internal structure / organizational structure of EOPPEP) and it comprises three departments: Dep. of National Qualifications Framework, Dep. of Qualification Certification and Dep. of Qualifications Certification Bodies Licensing.

At operational level, and for the achievement of the goals related to the certification of qualifications acquired through non-formal and informal learning and the licensing of certification bodies, EOPPEP (through the operational programme "Human Resources Development"), implements -as a beneficiary- the project "Development of a National Non-formal Education and Informal Learning Outcomes Certification System" (Budget: 155.102€), co-funded by the European Social Fund and national resources. The project is implemented in co-operation with international experts and includes the following:

- The formulation of the main guidelines permeating the design and control of the Certification and Licensing Systems compatibility and their interconnection with international standards and European practices. There will be adequate consultation before the finalization of the guidelines.

- The determination of the basic requirements for the transition to the new Certification and Licensing Systems.
- The design of Qualifications Certification System.
- The design of a Licensing System for the Qualifications Certification Bodies.

According to EOPPEP, the development of a National Validation System of the Outcomes acquired through non-formal and informal learning should be permeated by the following principles:

1. The design of a The National Validation System of the Outcomes acquired through non-formal and informal learning should be a product of social consent.
2. The National Validation System of the Outcomes acquired through non-formal and informal learning requires legislative regulation for its institutional fortification through securing social consent so that it addresses the real needs of the economy and society.
3. The certification of the human resources qualifications deriving from non-formal and informal learning is indissolubly connected to education, vocational training and employment. Thus, it has to be based on National Standards, which include educational standards, vocational standards whose function is described within EOPPEP's certified vocational profiles, evaluation, validation and certification standards.
4. The national certification system for human resources qualifications deriving from non-formal and informal learning should function complementary to the formal educational system (without substituting it), contributing to the linking of formal, non-formal education and informal learning subsystems.
5. The national certification system for human resources qualifications deriving from non-formal and informal learning should be linked with the development of the National Qualifications Framework.
6. The national certification system for human resources qualifications deriving from non-formal education and informal learning should not constitute a mere "introduction" of international certification standards and "accreditation" of certification companies, without national planning and with costly procedures ensued for individuals and enterprises.
7. Through the National Validation System of the Outcomes acquired through non-formal and informal learning, the State should guarantee the quality and the high "exchange value" of the country's human resources qualifications by securing: a) the avoidance of unilateral practices regarding job posts description on the part of enterprises that do not comply with commonly accepted National Standards, b) the avoidance of extending social and economic inequalities occurring when qualifications certification is exclusively a matter of private intervention and c) the state supervision as to the sufficiency (operational capacity and managerial proficiency, applied quality systems, planning experience and know-how on

learning outcomes certification, adequately trained human resources etc.) of the bodies that seek licensing to certify qualifications.

In addition, according to EOPPEP, the requirements for the successful development and implementation of the **National Validation System of the Outcomes acquired through non-formal and informal learning** are:

- Formulation of a national strategy.
- Securing social consent (state, social partners, professional associations, chambers, education and training providers, educational community) by means of co-operation between interested parties and public consultation.
- Securing austere state control.
- Legislative regulation for the statutory fortification of the National Validation System of the Outcomes acquired through non-formal and informal learning.
- Quality assurance, monitoring and evaluation of the non-formal and informal learning certification procedures with the aim of building a sense of mutual trust.
- Connecting the development of validation procedures of non-formal education and informal learning with the development of the National Qualifications Framework.
- Holistic approach to learning.
- Use of clearly defined terms of reference (e.g. standards, qualification levels).
- Ensuring the cohesion of learning outcomes and their correspondence to standards identical or equal to vocational qualifications acquired through formal education programmes (e.g. educational and vocational standard, evaluation, validation and certification standard).
- Ensuring institutional continuity (as to the competent bodies etc.).
- Ensuring sufficient human and financial resources.
- Education and training of the staff engaged in the design and implementation of non-formal and informal learning validation procedures.

Based on the above principles and conditions, the development of the **National Validation System of the Outcomes acquired through non-formal and informal learning** is perceived as an indispensable component or sub-system of an integrated system that comprises the following:

1. Ensuring a mechanism which diagnoses needs in Professions and Skills.
2. Identifying the professions and the subsequent occupations and skills the country is in need of.
3. Documentation of the qualifications in the process of certification.
4. Certification and update of Vocational Profiles (vocational standards)

5. Certification/approval of training programmes, study guides etc. (educational standards) based on vocational standards.
6. Counselling for certification.
7. Certification of qualifications in the field of Non-formal and Informal Learning based on evaluation, validation and certification standards.

1.2 Defining priorities in the certification of non-formal education

In compliance with Law 4186/2013 (*Secondary Education Reform and other provisions*), priority of the validation system applied by EOPPEP in the field of non-formal learning is given to the following areas:

- ✓ Validation of Qualifications and award of “Level 4 Specialty Degree” to “Apprenticeship Class” graduates of Vocational Upper Secondary Schools (EPAL).
- ✓ Validation of non-formal institutions’ graduates.
- ✓ Validation of old type vocational schools (lower technical schools, intermediate foremen schools) and of vocational training of professionals who do not have a recognized professional title.
- ✓ Validation of Initial Vocational Training and award of “Level 4 Specialty Degree” to graduates of all Vocational Training Schools (SEK) and Institutes of Vocational Training specialties (IEK).
- ✓ Validation of Greek Sign Language (GSL) and Braille system.

In addition to the priorities mentioned above and outlined at legislative level, it must be explicitly and implicitly noted that priority is given to the field and the beneficiaries of non-formal education and at a later stage the field of informal learning.

1.3 Development and application of validation procedure regulations (recognition, documentation, evaluation, certification)

A specific example of the development and application of validation procedure regulations regards the professionals who do not have a formally recognized vocational title in the “Private Security Staff” occupation. Relevant procedures took place between 2012-2014 with 11.108 individuals participating, 9.481 (85,4%) of whom were certified. In this piloting case, where the validation system was applied, the regulative framework:

- Protected individual privacy. In particular, every participant received a unique code with which they had exclusive access to assessment exam results. Consequently, the exam results of separate validation stages were not posted publicly. Thus, the principle of protecting personal data was met.

- Guaranteed fair and equal access as it facilitated participation in the validation procedures on equal terms. The only prerequisite was work experience regardless of whether participants had prior vocational training on the same or similar field.
- Fortified the participants' right to choose to take part in any of the four stages of the process (recognition, documentation, evaluation, certification), taking into account that at the recognition stage participants received a certificate for relevant vocational experience from the competent Ministry, namely, the Ministry of Public Order and Citizen Protection.
- Guaranteed that validation relevant regulations are a component of the National Qualifications System, since, institutionally, relevant qualifications/diplomas administered were defined within the national qualifications framework and corresponded to specific initial vocational training certificates. They also refer to specific levels both of the National and the European Qualifications Framework. It should be mentioned, though, that based on relevant regulations, there was no providence for access to formal education.
- Included specific measures for active participation of stakeholders, both in the development and in the implementation of the relevant processes. In particular:
 - The certified Vocational Profile was developed by the Greek Security Staff Employees Federation and the Staffed Security Service Enterprises Association.
 - The validation procedure is institutionally based on fortified inter-ministerial co-operation between the Ministries of Education and Religious Affairs and of Public Order and Citizen Protection.
 - It guaranteed interaction between EOPPEP's and KEMEA's (Centre for Security Studies) informatics systems.
 - Validation exam participants can retrieve evaluation exam results electronically.
 - The Central Evaluation Committee (KEA) consists of two EOPPEP representatives, a representative from employers' organisations (Hellenic Confederation of Professionals, Craftsmen & Merchants – GSEVEE, Hellenic Federation of Enterprises – SEV, National Confederation of Hellenic Commerce – ESEE), a representative from third level trade unions (Greek General Confederation of Workers – GSEE, Higher Administration of Civil Servants' Associations – ADEDY), and a representative from KEMEA.
 - The Central Exam Committee (KEE) is made up of one representative from EOPPEP and two from KEMEA.

Moreover, some significant features of the implemented procedure are:

- Potential interested parties on issues regarding the conditions and procedures for participation in the validation process were informed through EOPPEP, the Security Staff Employees Federation, the Centre for Security Studies (KEMEA) and the Staffed Security Services Enterprises Association websites. Apart from website postings, there were dissemination events focused on relevant stakeholders.
- There were counselling support services provided to those who expressed interest by expert counsellors.
- The diagnostic skills assessment comprised theoretical and practical **sections** and was conducted during the validation exam procedure, in compliance with the certified vocational profile, the authorized training regulation and the certified regulative validation framework.
- The counsellors who provided career guidance services as well as the assessors who were primarily responsible for the exams attended seminars and training programmes.
- Participation in the exams cost the participant the amount of 150€ (100€ for EOPPEP and 50€ for KEPEA).

Deriving from the experience acquired in the field there are distinctive improvement modifications on the statutory framework according to provisions defined in Law 4186/2013, especially where the validation and certification of professionals without vocational diplomas are concerned.

2. Views and reactions of delegates from representative professional associations and social bodies towards the developing validation regulations.

In general, the views and reactions of delegates from representative professional associations and social bodies towards the developing validation regulations are positive. However, there were some reservations about certain issues. Their reactions, positive or negative, and their propositions can be summed up in the following points.

2.1 Definition of the main goals of validation regulations corresponding to the features, needs and priorities of the socio-economic environment

Non-formal and informal validation systems are not neutral from an economic, social and cultural aspect. On the contrary, they reflect specific needs and are expected to serve specific functions in conjunction with the priorities of specific societies. Taking this into consideration, the main goals and the anticipated functions of validation systems must be defined. Greek society has faced recession for 6th consecutive year and demonstrates an unemployment rate

that nears 28% for total population and 60% for the most educated and dynamic part of the workforce, the young between 18-24 years of age. Furthermore, it is tested with the enforcement of deregulating job market decisions and the downgrading of collective representations and social consultation.

Under these circumstances, and without a foreseeable outlook for exit from this multi-faceted, financial, social and political crisis, the advent of a regulative Validation System of the Outcomes acquired through non-formal and informal learning is received neither as a measure that can be conducive to unemployment decrease nor as one that can address the need to restore the role of collective regulations in the job market. Workforce mobility does not seem to be a persuasive answer for a workforce that cannot look at the green side of things, even if they change post, at least within the country.

Moreover, especially where certain aspects of validation regulations are concerned, they are not regarded as priority and they are seriously questioned. These fears lie on the assumption that such measures can propel existing inequalities between those who are strongly immersed in the job market and those who are cut off and find difficulty in entering it. On the contrary, the same measures are considered to be important by some northern E.U member states, which have incorporated them in the job market and the occupational structure. Such measures are the recognition of additional, fragmentary qualifications for worker categories which are already well immersed in the job market.

Taking into account the Greek reservations and prioritizing the existing social and economic needs, a large part of representatives from professional and social associations are of the opinion that the pivotal goal of national regulations regarding validation should be the support of weaker social groups so that they can obtain integrated and recognised vocational qualifications that will help them enter the job market.

2.2 The pursued main features of validation regulations

Generally, all delegates from the representative vocational and social associations consider the approach adopted by EOPPEP regarding the development and implementation of the National Validation System of the Outcomes acquired through non-formal and informal learning to be sound. Regulations related to validation can be perceived only as an integral part or sub-system of an integrated system that includes:

- Ensuring that a mechanism will diagnose needs in Occupations and Skills.
- Identification of occupations, specialties and expertise the country needs.
- Documentation of the potentially certified qualifications.
- Certification and updating of Vocational Profiles (occupational standards).

- Certification/approval of training programmes, study guides etc. (educational standards) based on occupational standards.
- Counselling to support validation.
- Certification of qualifications in the field of Non-formal Education and Informal Learning based on an assessment, validation and certification model.

In order to guarantee and strengthen the above approach, a large part of the delegates from the representative professional and social bodies consider the following points to be especially important:

- The statutory assurance of the strong presence of public and social bodies in constructing and operating the non-formal and informal learning validation system and, in large, the national qualifications framework and life-long learning systems. Among other things, this means that the special role of recognized social partners in all mentioned sub-systems comprising the integrated Validation System of the Outcomes acquired through non-formal and informal learning must be fortified.
- The role of institutional social partners acquires special significance when it comes to defining the sub-system for documented prioritizing of the qualifications that are currently in the fortification process. The framework of the prioritization should be predefined by the main goal of the validation regulations as is mentioned in 2.1. The specification of this goal and the definition of special regulations permeating validation procedures, the counselling support processes of particular social and professional groups, the definition of evaluation, validation and certification standards, the nomination of validation bodies etc. should all be foreseen through simple, transparent and socially legalized procedures. The prospect of strong presence of institutional social partners in the relevant processes will incorporate the organized social control throughout the system operation, increasing in this way its social acceptance, viability and effectiveness. Two more aspects must be pinpointed here:
- The provision of an effective and well organized social supervision of the validation system and especially of the priority definition sub-system in the qualifications that undergo a certification process. This will be achieved with the contribution of institutional and social partners, which, in turn, constitute a strong and available means of preventing the extreme commercialization of the whole system. It should be noted, here, that the national experience in this field is negative, taking into account the creation of a profitable but socially barely beneficial “market” of the Centres for Vocational Training (KEK) in the last two decades, which benefited from the “abundant” resources coming from E.U. Structural Funds. To avoid similar phenomena we should

- ensure that there is public inspection of the regulations and deter the impact that pressure groups (lobbies) have and which, unavoidably, will occur.
- Another important measure is the enhancement of partnerships for the creation of reliable non-profit, validation bodies that will supply quality and –at the same time– inexpensive services for beneficiaries. Finally, an equally significant measure is the deterrence of the devised, absolute interconnection of resources coming from E.U. Structural Funds and which are designated for life-long learning with validation activities. Such a measure will not only create an extremely commercialized market of questionable social usefulness, but it will also, nullify the right of the organized state to impose principles and rules in areas of special public interest.
 - Regulations regarding validation and the various levels of the roles of public administration should be transparent, simple and effective. The existing regulations are characterized by a strong dependence of the public administration on the Executive Power. The –all too often– “renewed” definition of the terms and conditions for qualifications certification in a presidential decree and the –all too often– regulation of the certification process in a ministerial decision (see Law 4115/2013, article 15) reflect the existence of an ultra-centralised Executive Power.
 - The Validation System of the Outcomes acquired through non-formal and informal learning should be linked to the national qualifications system through its correspondence to specific and recognized vocational qualifications/diplomas. The last stage of validation, the “certification” of qualifications should be about the access and fortification of specific professional rights. Only in this way will social interest arise, generating incentives that address certain needs of stakeholders.
 - A large part of delegates from representatives of professional and social bodies highlighted the need for the validation system to orientate itself mainly towards overall, not fragmentary qualifications. To a large extent, this targeting is linked to the primary goal of the system, as it was defined in 2.1. The orientation of the interconnection of validation systems to specific overall qualifications is an indispensable term for the preservation of a quality assurance cycle throughout the system. Only this way can the sequence of the different stages be followed. The stages start with the recognition for qualification needs, the certification of corresponding vocational profiles, and the certification of educational standards and, in turn, the certification of evaluation, certification and validation standards related to recognized diplomas within the national qualifications system, which lead to specific vocational rights.

2.3 The relation of alternative learning paths: equal or complementary?

A fundamental principle of the impending regulatory system differentiates the whole group of the vocational and social associations delegates: the equivalence of learning outcomes acquired through non-formal education and informal learning to those acquired through formal education.

The differentiation mainly lies upon the assumption that the nature of knowledge that stems from formal schooling/organized learning is quite often different from the nature of knowledge that originates in experience. Consequently, these two diverse learning paths cannot always lead to the same outcome. Participation in education and exercising a particular vocation, despite their different goals, can both contribute to the acquisition of knowledge and skills, but they are not necessarily interchangeable.

There must be a clear distinction between the –primarily- cognitive/mental dimension of the educational experience, as is the case within educational institutions, and the practical-experiential dimension of vocational experience accumulated from direct involvement in work life. In some cases, because of the nature and the content of learning, the lack of internship and professional experience cannot be substituted by a training course. In other instances, though, systematic education is a necessary precondition for the effective application and thorough understanding of specific implementation conditions and requirements of a particular profession. The Security Staff certification process that was implemented proved the vast majority if participants lacked knowledge and skills that should be acquired complementary through systematic learning.

It is, therefore, suggested that alternative learning paths be regarded as complementary and mutually helping social practices. In any case, however, since these are different, unequal processes and it is not possible to regard them as separate processes, they cannot, in turn, lead to equal and substitutable learning outcomes. The greatest danger in attributing institutional equality and substitution ability to heterogeneous outcomes lies on the “violent” rearrangement of the education-work relationship, which, despite the evocation of equal opportunities notion, will eventually bring about a “downward” equality, through the downgrading of formal educational paths which will become unattractive. In this framework, the following points are made:

- The major goal of national qualifications framework and the outcomes validation regulations must be to increase participation in formal educational systems. The equality goal is not secured with declarations of principles without having some exchange value in the job market or without specific measures towards the pedagogical cultivation of responsible citizens. Therefore, the “promotion” of learning paths that do not generate equal outcomes should be avoided as these are not recognized by the market; they tend

to deregulate it, downgrading the value of outcomes acquired through formal educational paths.

- The acquisition of knowledge and skills through organized, systematic education is an irreplaceable social and personal experience that should be offered to every citizen. Every occupation and specialty refer to general scientific fields, are connected to broader knowledge areas, the learning of which can make individuals independent, active citizens as well as complete and adjustable professionals. The educational procedure, when properly applied, ensures adjustability, a broad ability to manage uncertainties, new and unpredictable conditions, and the ability and pursue of continuous learning. The downgrading of educational paths in a period when the significance of organized learning –even for the horizontal/social skills- increases would be a serious mistake with long-term impact on Greek society and economy. Moreover, the dangers of reproducing polarization between over-educated/qualified and under-educated/qualified, functionally and literally “semi-educated” (or “uneducated”) are not only existing but increasing, too, since the current life-long learning policies have been unsuccessful in containing and reducing inequalities.
- In the framework of introducing regulations regarding validation, there is the opportunity to recognize and homogenise –in a socially acceptable manner- existing regulations through which professional permits and ensuing professional rights are also regulated. In a broader sense, existing regulations on technical –mainly- professions constitute a kind of recognition of professional experience or equivalent vocational training leading to specific and recognized qualifications. The integration and arrangement of these regulations in the impending non-formal education and informal learning outcomes validation system should be realized within a broad social consultation and based on the principle of equal opportunities, the protection of consumers, the environment and public health and security (when such challenges occur).

2.4 Towards a balanced approach of learning outcomes role

The notion of a learning outcome constitutes a fundamental principle of validation regulations. Because equivalence cannot be sought at the level of procedures, namely of the special nature of learning paths, it is sought at the level of outcomes. This, though, can cause three different – though interdependent- side-effects. Firstly, it causes the disruption of the balance between incomes, procedures and outcomes at the educational procedure level and, in consequence, the subversion of the relationship of central quality parameters in the educational process. Secondly, it causes the “shrinking” of the learning outcome content in only what can be measured or registered within a “tightly” defined vocational profile. Thirdly, it causes the

downgrading of the educational process by displacing the system to summative assessment and examination. Taking the above into consideration, we should mention that:

- Learning outcomes as these are defined in vocational profiles or a combination of vocational profiles and additional educational aims / anticipated learning outcomes, are a basic pillar for the design and the implementation of validation of knowledge and skills. Yet, apart from learning outcomes, incomes (certification of programmes, trainers, training centres etc.) and procedures (teaching goals, use of suitable training methods etc.) should also be considered to be equal pillars for the quality of the system. Among these three pillars, balance, synergy and mutual feedback should be guaranteed. In this context, the evaluation of the qualifications of individuals may be conducted mainly on the basis of learning outcomes but qualifications should also be periodically evaluated at a systemic level, so that feedback can be used to improve incomes and learning paths processes.
- The content of the learning outcome must be expanded so that it can include “inconspicuous” and “horizontal” qualifications that, often, are not reflected on the vocational profile. We may be far from the ‘end of labour” but we are deeply into a reality where even the most rudimentary work demands the motivation of wider, beyond the limited vocational skills. These skills are related to language spiritual cultivation, cultural foundation and the citizen’s quality. The knowledge that all these qualities cannot be represented in the learning outcomes, or it cannot be represented reliably, should respectively influence the opinion we have about the width and the importance of countable learning outcomes.
- The danger of unilateral emphasis of the system on learning outcomes will gradually make worth learning only what is actually tested. The transfer towards an exam-oriented system should be avoided, given the negative experience of the country in the case of upper-secondary education (lykeio), where the dominance of university entrance exams has created a “parallel” market that gradually substituted and distorted the public character and the contents of the educational procedure. Thus, the following steps are necessitated:
 - The adoption of a holistic perspective towards learning that would count in all the dimensions of learning: the cognitive, the one of intrinsic motivation (emotional dimension) and that of interaction (social dimension) and would guarantee an efficient combination of theoretical and practical knowledge and a uniform and multi-faceted general and vocational education.
 - The introduction of effective measures in order to prevent the creation of an “artificial” market, the viability of which will depend on the proliferation of necessary (?) certificates. The field of this market must be clearly defined as to

its limits and rationally regulated so that validity, reliability, social trust and citizen protection are achieved. To this end, the roles of EOPPEP and of social partners are crucial.

2.5 Regulation measures adjusted to individuals' needs

During the consultation, a considerable number of delegates of representative vocational and social partners believe that specific measures should be taken, which are expected to contribute to the adjustment of the impending regulations to individuals' needs. The main highlights regard the following:

- Impeding regulations enrich and redefine the career guidance counsellor's role and the content of counselling services. So far, the role of counselling was mainly about the career guidance of the young. Under the new regulations, counselling services should broaden their target group, including the entire workforce. They should also become more specialized and effective, providing users with reliable information on the possible paths they can take towards certain professions or groups of professions. On the other hand, proper counselling should provide support both on entering certain learning paths and while learning takes place. In so doing, individuals will achieve completion of a learning path and recognition and certification of newly acquired qualifications. In result:
 - Proper measures must be taken in time to create the appropriate and numerically sufficient assessor body. The introduction of a counsellors' registry, with predefined specifications and procedures for the inclusion of those who will be interested in it, is a necessary step. The precedent of training and certifying "adult trainers" can serve as a model of good practices that surfaced in the same environment. With appropriate modifications, this model could be put into good use. A similar approach and measures relate to the case of qualification assessors.
 - The initiative and the inspection of measure implementation falls into the responsibility of EOPPEP since educational and career counselling is one of its major areas of activity.
- The criteria employed in evaluating formal education stand for the evaluation of non-formal education and informal learning outcomes. Whatever adjustment should be attempted, on the one hand, with respect to the content and nature of specific learning paths and the qualitative characteristics of the examination participants. This entails that tool adjustment is a process of vital importance which should neither create new inequalities, excluding certain social groups who

followed different learning paths, nor lead to a kind of “downward” inequality. In any case, however, the role of tools –though important- is essentially limited to the stage of evaluating knowledge and individual skills. The breadth of the system is assessed on the extent to which it enables permitting, defining and facilitating transition between learning paths, supporting -at the same time- individuals through information services, counselling support and guidance.

- The reliability and validity of validation process is a prerequisite for its effective function and the attainment of its goals. What is significant, here, is the clarification of EOPPEP’s and ESYD’s roles.
- The simplification of the terms used in the discussion about validation regulations constitutes an indispensable condition for their social acceptance. Care must be given to the popularization of terms and to the communication of the regulations application areas to both target groups (e.g. roma population, professionals without recognized vocational skills) and activity areas without present vocational recognition (e.g. voluntary work).

B. Views / reactions to 2014-propositions on the directives for the validation of non-formal and informal learning, especially to the main principles of validation.

During the workshop discussions there was a concise presentation of the eleven main-principle plan that is impeding and is to permeate validation regulations. To sum up, these principles are:

1. The individual is in the Centre of the validation process. The validation is, by principle, voluntary. The protection of individuals’ private life must be secured.
2. The validation process consists of four basic stages: recognition, documentation, evaluation and certification. Individuals are free to select which stage they will enter.
3. Information on validation must be available wherever people live, work and receive education. Information should be provided systematically, reflecting the distinction between public, private and non-governmental entities.
4. Guidance and counselling support is vital so that individuals can adjust the validation to their own needs and interests. They need to have access to career guidance as to how validation can live up to their needs and interests. Guidance and counselling will clarify the benefits and costs of the validation process to people, thus, assisting them in making the right choices.
5. Validation must be a component of the national qualifications system. Individuals must be given the ability to acquire the entire or part of a qualification on the basis of validating learning outcomes.

6. Vocational qualification standards are defined and described in terms of learning outcomes (knowledge, skills, and competences). The same or equivalent standards should be used for the learning experiences of non-formal or informal learning. The value of a qualification reflects its response to the specifications of a model and not the framework of the learning that led to the acquisition of a qualification.
7. Ensuring that the quality must be explicit and imbedded into the entire validation process.
8. The vocational competences of validation counsellors and assessors must be developed.
9. A skills diagnosis must be provided to individuals who are unemployed or in danger of unemployment. The co-operation of employment services with other interested bodies is of vital importance to skills diagnosis.
10. Skills assessment is an integral part of human resource development for enterprises to further enhance learning and career prospects.
11. Validation outcomes should be –ideally- registered by means of existing systems (ECTS and/or ECVET) and refer to the relevant levels of the National and European Qualifications Framework.

Participants in the consultation consented and accepted most of the principles mentioned so far. At institutional level, the way to implement these principles was registered regarding the validation of professionals who do not have a recognized vocational diploma, namely, the “Security Staff” specialty. Also, there were specific propositions for the operational support of the implementation of these principles, for instance, the quality and efficiency improvement of counselling support services and guidance (principle 4), the improvement of counsellors and assessors’ professional competence (principle 8), the reliability and validity of regulations (principle 7) etc.

On the other hand, there have been a number of differentiations on the part of certain participants and interlocutors. These must be pointed out so as to enhance a continuous dialogue and, eventually, complement the principle design.

The first and foremost differentiation refers to principle 1. It is a matter of extreme oversimplification for the citizen and their individuality to be central to validation process because the latter bears social and collective aspects. In the very validation process there are organized representations of interests involved and this constitutes an important factor for organized and effective social inspection of regulations. The downgrading of this role can act negatively for the interests of the individual. It should be underlined that, despite the fact that social associations are invited to play a role and participate as stakeholders in the

validation process, this very participation is not regarded as a principle in validation systems. This contradiction can be removed with the highlighting –in the same article- of the social implications of the validation regulations and the inclusion of the role of social associations, citizens' society and social partners in the entire spectrum and stages of the validation process.

The second differentiation refers to principle 6. The relevant rationale and the contents of this differentiation were outlined in sub-sections 2.3 and 2.4.

Finally, a third, partial, differentiation refers to principle 5 and regards the partial qualifications. Many of the delegates of representative vocational and social associations do not, in principle, reject the interconnection of the validation process with partial qualifications. However, they highlight the priority of this interconnection with overall qualifications, in compliance with the primary goal of the validation process, especially for Greece since the country is undergoing a particularly difficult time.