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## RECOGNITION OF PRIOR LEARNING: POLICY ANALYSIS FROM DENMARK AND INDIA

### ABSTRACT

*This comparative study based on policy documents and statistical data analyses how the implementation of Recognition of Prior Learning policy designs has developed in two contrasting contexts (cases), Denmark and India, using the conceptual formulations of Ehlers' Box Model (2005), the Integrated Implementation Model (Winter, 2012), and Policy Instruments (Vedung, 1998). As requirements for effective policy implementation, the authors argue for the involvement of all stakeholders, ownership and accountability by stakeholders leading to effectiveness in the short run and policy evolution in the long run, and the use of an appropriate mix of policy instruments.*

**Keywords:** *recognition/validation/accreditation of prior learning, employability, inclusion, Denmark, India*

### PRIZNAVANJE PREDHODNO PRIDOBLENIH ZNANJ: ANALIZA DANSKEGA IN INDIJSKEGA PRISTOPA - POVZETEK

*Primerjalna študija temelji na analizi dokumentov o politiki priznavanja predhodno pridobljenih znanj ter statističnih podatkih o rabi in izvedbi te politike v dveh različnih kontekstih (primerih): na Danskem in v Indiji. Uporabljene so pojmovne formulacije Ehlersovega modela (2005), modela integriranega izvajanja (Winter, 2012) in instrumentov politike (Vedung, 1998). Pogoji za učinkovito izvajanje politike so vključenost vseh nosilcev interesov, prizadevanja in odgovornost nosilcev interesov, ki kratkoročno vodijo do učinkovitosti in dolgoročno do razvoja politike, ter raba primerne kombinacije instrumentov politike.*

**Ključne besede:** *priznavanje predhodno pridobljenih znanj, zaposljivost, vključevanje, Danska, Indija*

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## INTRODUCTION

The International Labour Organisation (ILO),<sup>1</sup> the European Union (EU), and the United Nations Educational, Scientific and Cultural Organisation (UNESCO) have been pushing the Recognition of Prior Learning (RPL)<sup>2</sup> through guidelines for the development of national RPL policies (ILO, 2004; European Council, 2012; UNESCO, 2012). RPL was promoted as a social policy tool in 1972 to create “learning opportunities for the under-privileged” (UNESCO, 1972, p. 41). In 1995 the European Commission (EC) portrayed it as an economic policy tool for promoting employability for all (EC, 1995). Several countries have adopted RPL since it is regarded as a win-win policy for all stakeholders: adults seeking RPL, providers offering RPL, employers needing certified human resources, unions aligned with the interests of any of these stakeholders, and the state, which is responsible for citizen welfare and the economy.

The paper is divided into eight sections. Section 1 explains why RPL has become a policy tool for the development of employability and formulates a research question. The conceptual framework is described in Sections 2 and 3 with formulations by Ehlers (2005) about three ideal types of RPL policy design, and by Winter (2012) about a general model for policy implementation. A description of supplementary conceptualisations of administrative principles by Winter and Nielsen (2010) in *Market, Hierarchy and Network*, and policy instruments by Vedung (1998) in *Carrots, Sticks and Sermons* is included. In Section 4, RPL is discussed as a policy design for employment policy. Section 5 and 6 demonstrate the development of national policy designs in Denmark and India. A comparison and discussion of RPL in Denmark and India are included in Section 7, and Section 8 comprises the conclusion. The methodology includes case studies of Denmark and India using policy documents and statistical data, followed by the comparison of the two cases. Ehlers’ Box Model, the Integrated Implementation Model and Policy Instruments are used as conceptual formulations.

## RPL AS A POLICY TOOL FOR EMPLOYABILITY

Lack of employability is a major global challenge leading to various socio-economic problems and political unrest. The high number of unemployed people, youth population in NEET (Not in Education, Employment, or Training), immigrants and refugees, and those employed in the informal (unorganised) sector need pathways for livelihood and opportunities for further economic growth (Box 1). Marginalised populations are excluded from the mainstream development process and their cultural identity is often at risk because their knowledge, skills and competencies are rooted in indigenous cultures comprising the sustainable component of their identity. Those who migrate from one country to another might possess knowledge, skills and competencies that are relevant

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1 Led by social partners.

2 In this article, recognition, validation or accreditation of prior learning are considered to be synonymous policy terms and RPL is used as a common term to represent all of them.

but not recognised in destination countries. Their knowledge, skills and competencies gained informally or non-formally, equipping them for better opportunities of livelihood and inclusion, cannot be materialised effectively without formal certification. Their integration in the mainstream development process becomes difficult and they become social costs rather than productive human resources. While at the macro level, this accentuates the skills gap, hampers productivity and reduces overall gross domestic product (GDP), at the micro level, it hinders the process of inclusion of individuals in society by keeping their earnings low, limiting their rights, and obstructing their social inclusion.

Estimation of prior learning can boost economic growth, pull many out of socio-economic problems, enhance their social integration, and decrease some of the possibilities for political unrest. Apart from that, dynamic labour markets that render much of the existing knowledge, skills and competencies obsolete and frequently create the need for new ones also demand the constant upgrading and recognition of learning in all kinds of settings as and when the demand for them arises.

Box 1: Statistics regarding lack of employability

- 5.6% (192 million) of the global population is unemployed (2018)
- 7.3% of the population in the EU is unemployed (2018)
- 10% males and 34% females (15–24 years) globally are neither in employment, education or training (NEET) (2017)
- 53% of South Asian females are in the NEET category (2018)
- 17.2% (15.8 million) amounting to one fifth of Young Europeans (15–34 years) are in the NEET category (2017)
- 258 million people are immigrants and 25.4 million people are refugees across the globe (2017)
- 85% of refugees live in low- and middle-income countries outside of Europe (2018)
- 22 million immigrants lived in Europe in 2017
- More than 90% of the labour force in Micro and Small Enterprises and more than half of the global labour force is employed in the informal/unorganised sector with limited workplace rights and facilities (2018).

Sources: Eurostat, 2018a, 2018b; ILO, 2018a, p. 2; 2018b; 2018c; 2018d; United Nations High Commissioner for Refugees (UNHCR), 2018.

Owing to the huge skill gap in the labour market and poor learning outcomes from education systems all over the world, RPL appears as a quick solution for promoting employability. It can provide better career opportunities, motivate the beneficiaries towards learning more, promote mobility, enhance inclusion and increase productivity. Keeping in mind the relevance of contextual factors, in this paper, RPL is analysed as a policy tool for promoting employability in two contexts, Denmark and India. The comparison is based on the question: *How have RPL policy designs been developed and implemented in different contexts?*

## CONCEPTUAL FRAMEWORK

Winter's (2012) Integrated Implementation Model and Ehlers' (2005) formulation of three ideal types of RPL policy design provide a conceptual framework for understanding the development and implementation of both top-down and bottom-up RPL policies in different contexts. Understanding how a multi-staged policy process (in this case, RPL) might achieve a certain goal (in this case, the promotion of employability), it is important to analyse the stages of the policy process one by one.

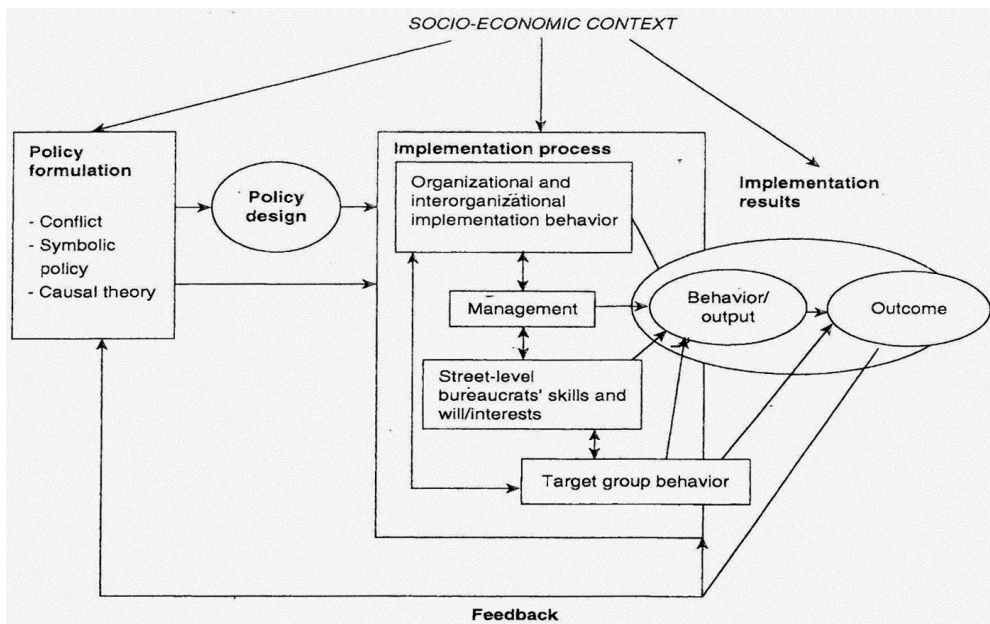


Figure 1: The Integrated Implementation Model

Source: Winter, 2012.

As evident from Figure 1, the implementation process comprises of five different variables: 1) policy design, 2) organisational and inter-organisational behaviour, 3) management behaviour, 4) street-level bureaucrat behaviour and 5) target group behaviour (Winter, 2012, p. 258). According to Winter's model, the policy formulation can be 1) characterised by conflict among stakeholders, 2) based upon a theory of causality or 3) symbolic (implying pretention of action rather than real action).

At the stage of designing a policy, the structure and functional relationships are chalked out, for instance, who will do what, when, and how. Ehlers (2005) states that even though RPL policy designs may differ because of contextual factors (culture, history, past policy choices, and the like), three *ideal types* can be identified: the market-led, the state-led and the partner-led type (Ehlers, 2005, pp. 505–511).

In the *market-led ideal type*, non-profit associations (funded by competing, self-governing providers) formulate and implement the RPL policy design. Even though the state might provide basic policy guidelines, no public subsidies or public monitoring might be available. RPL is a product in the market that individuals can buy from providers if it benefits them and is affordable. The state, unions and employers are not involved or are negligibly involved. Thus, RPL is not a state prerogative. The RPL policy designs that took shape in the US are market-led and have since 1974 been regulated by a non-public institution, CAEL (Cooperative Assessment of Experiential Learning). In the UK, government policy guidelines similarly act as the basis for RPL policy designs. RPL is defined as “identification by an awarding organisation of any learning undertaken, and/or attainment, by a learner” (Ofqual, 2018, p. 70). This implies that self-governing providers formulate and implement RPL policy designs in the UK.

The core in the *state-led ideal type* is the state which formulates, implements and evaluates RPL policies. RPL is conceptualised as a right for citizens or at least manifested as a provision for citizen welfare, and the duty of the state. Market and social partners have limited influence while the state pays all major costs and monitors policy implementation. For instance, education providers, unions and employers have limited influence on RPL policy formulation and implementation in France. The Validation of Acquired Experience (VAE) (or RPL) is the citizens’ right and the state’s duty.

Tripartite negotiations among the state and social partners regarding who gets and pays what, when and how comprise the core in the *partner-led ideal type*. The stakeholders pay the costs directly or indirectly and benefit from RPL. Policy designs can be changed over time as they are compromises among stakeholders. German-speaking countries and Nordic countries have partner-led policy designs built upon tripartite negotiations. For instance, methods and tools for *Realkompetanse* in Norway were developed in a huge state-funded project between 1998 and 2002, engaging stakeholders from private, public, and voluntary sectors. The Norwegian RPL reform was based on the experiences gained during the project.

## ADMINISTRATIVE PRINCIPLES AND POLICY INSTRUMENTS

Supplementary conceptualisations are relevant for the comparison of RPL policy designs. Winter and Nielsen (2010) describe three administrative principles<sup>3</sup> that influence all variables: *market*, *hierarchy* and *network*. These principles are usually developed/rooted over time in a particular context and are difficult to change. The market principle in such a context is led by actors aiming at profit-optimisation in the long-run for the employers and adult learning providers. The policy designs are implemented on the basis of whether there is a demand in the market for a particular outcome and someone (adult learners or employers) is ready to pay for it. The administrative principle of hierarchy is a top-down approach in which the state develops a policy design and all stakeholders have to follow

3 Ways in which the administration of the policy implementation process is organised in a particular context.

the orders of the state or else be penalised. The network administrative principle characterises a bottom-up approach and is used in contexts where policy decisions are usually reached by consensus. The implementation of the network principle requires strong social capital and cultural norms that support the implementation of all policy decisions once they are taken. Using this principle for implementation implies that a consensus is reached and trade-offs are negotiated among different stakeholders, who then decide to implement a policy motivated by whatever outcomes they have negotiated for themselves.

The administrative principles identified by Winter and Nielsen (2010) appear as corresponding to Ehlers ideal types (2005) but they refer to different phases of the policy process. Winter and Niensens' (2010) descriptions could explain why a particular type of policy design as per Ehlers' (2005) conceptualisation find (do not find) less or more resistance in a given context during implementation, despite being logical or beneficial for the stakeholders. Problems in the execution of policy implementation by, for example, implementation managers or street-level bureaucrats<sup>4</sup> can lead to the ineffectiveness or the failure of policies. For instance, hiring untrained assessors (street-level bureaucrats in Figure 1) to conduct RPL assessments might ruin the policy outcomes since the assessment of RPL requires specialised professional competencies to understand the complexities of human learning and specify what has been learnt in informal and non-formal settings. Thus, when administrative principles do not support the policy design, policy change might be obstructed due to path dependency. This implies that once an administrative principle becomes deeply rooted (a path is chosen) in a context, changing it might incur huge, multiple costs owing to the change required in the structured, non-structured institutions, values, beliefs, culture and the like that develop around it. Individual human behaviour (of the professionals and the target group) is an important factor that makes path dependency concrete. Moreover, inducing changes in the administrative principles for one policy might make policies incoherent at large and create confusion or failure to ensure the smooth flow of actions and impact among stakeholders.

However, this does not imply that change is impossible. Policy designs could vary across policies, and all policies in a given context do not necessarily follow a similar design, unlike administrative principles. For instance, even though the Indian policy design for RPL is state-led, that is not necessarily the case for other Indian policies, whereas the administrative principle remains hierarchical. Furthermore, policy designs extend beyond implementation and include evaluation and further input for formulation and policy change. In addition, changes in the context provide a critical juncture or a window of exceptional opportunity or conjuncture (a situation in favour of change) that can be used by decision makers to introduce reforms or radical changes in policies with minimum resistance (Cerna, 2013, p. 4). Moreover, changes can also occur due to a change in the *advocacy coalition* (alignment of influential stakeholders along a certain approach or perspective) emanating from a window of opportunity or independently (Sabatier, 1998, p. 129, 139;

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4 In the case of RPL, street-level bureaucrats are the staff who assess the applicants.

Gornitzka, Kogan, & Amaral, 2005). Sometimes, policy changes are merely incremental, induce continuity and lead to building-up of policy, for instance, *Realkompetence* in Denmark. On the contrary, aiming at discontinuity through incremental changes can lead to gradual transformations in the long run while abrupt changes can lead to policy replacement.

The implementation of a particular policy design using a particular administrative principle embedded in a certain context is done by utilising a combination of *policy instruments*. Vedung (1998) has identified three policy implementation instruments: *carrots, sticks and sermons*. While carrots imply gains (economic or otherwise), sticks imply punishment, and sermons imply information, awareness and value-based appeals regarding why a certain policy should be implemented (Vedung, 1998). The conceptualisations by Ehlers (2005), Winter and Nielsen (2010), Winter (2012) and Vedung (1998) are used to analyse and compare the contrasting RPL policy designs in Denmark (partner-led) and India (state-led), providing adequate scope for testing the considerations embedded in the conceptualisations. The market-led type is not used for comparison but for reference and reflections because of the authors' limited knowledge about the contexts with market-led policy designs.

## **RPL POLICY AND THE PROMOTION OF EMPLOYABILITY**

Popular definitions of public policy, such as *policy refers to what a government decides to do or not to do* (Lineberry, 1977), are becoming less relevant with the increasing participation of stakeholders. In Nordic countries, it is not really up to the state to take policy decisions on its own. Furthermore, the influence of transnational actors at different stages is sometimes more relevant than the influence of governments. Thus, at least in the case of RPL, a policy is public, owing to the recipients or the target group influenced by the policy rather than who decides, implements, or evaluates it.

Learning occurs in various settings: formal, non-formal and informal; it is a constant, lifelong and life-wide process. The formal recognition of all types of learning outcomes achieved at different stages in life and in different settings adds to the description of an individual's capabilities to do (or not do) a particular task. It helps to identify whether an individual would fit the requirements of a particular job. In labour markets marred by a skills gap, it even becomes critical to identify all the skills and competencies an individual has in order to address skill mismatch. Moreover, the estimation and recognition of an individual's learning outcomes enables that person to make informed choices regarding what skills and competencies are lacking and should be acquired for her/him to access the employment opportunities available in the labour market.

Formal certification of individual learning outcomes can also provide her/him with alternative opportunities to access the formal education system on the basis of learning outcomes achieved outside it, in non-formal or informal settings. This may create pathways for the social inclusion of individuals who did not have access to formal education channels or organised sector employment opportunities in the labour market.

Thus, RPL is a policy tool in favour of employability on the job market as well as access to formal learning. It is also known as Accreditation of Prior Experiential Learning (in the US), Prior Learning Assessment and Recognition (in Canada), *Realkompetence* (in the Nordic Council of Ministers (NCM)), and Validation of Non-Formal and Informal Learning (in the EC). The EU recognises accreditation, certification, recognition, assessment (and the like) of learning outcomes in non-formal and informal settings as validation of prior learning.

In most countries, the procedure for RPL is defined under a common framework or RPL Policy formulated by the state, market and/or social partners. The most generalised steps include: 1) application by the individual to the relevant authority for the recognition of knowledge/skills/competencies that need to be formally recognised; 2) an evaluation of the knowledge/skills/competencies of the applicant by the relevant authority according to a uniform qualification framework defined or recognised under the policy framework in a given context; 3) award of formal certification from the competent authority; and 4) recognition of the certificate by an employer/education provider and access to the labour market and/or formal education on the basis of that certificate.

## **THE DEVELOPMENT OF NATIONAL RPL POLICY DESIGNS IN DENMARK AND INDIA**

### **The Danish Case**

Denmark is a small (the current population is 5.6 million), high income country with negligible informal economy (apart from the exchange of services mainly in rural areas (black economy) and certain micro-level economic activities often by second generation immigrants). Danish society is organised into numerous associations about almost everything. Adults with similar interests engage with one or even multiple associations. Policy decisions are taken primarily through consensus among stakeholders rather than by a majority vote unlike in many democracies. Much consensus is reached through *tripartite negotiations* among the state, employers and unions (organised as associations). Parliamentary Committees interact with respective Ministers since it is possible to establish minority governments. Policies formulated by Parliamentary Committees ensure that policies are developed with a long-term perspective rather than with short-term populist considerations. Changes in governments do not lead to abrupt policy changes even though changes in strategies are introduced owing to the difference in the way each government works. Thus, negotiations related to a particular policy area might go on for decades until a mature system is achieved and all stakeholders gain enough to form a consensus. A wide variation or contrasting differences among stakeholders' interests may lead to rather vague policy designs with limited regulations (Ehlers, 2005). The policies are actually often open for interpretation by each stakeholder (micro-politics) so that consensus can be reached during the implementation process (see Figure 1). Even though this leads to the introduction of experimental policy designs or the formulation of policies according to contextual dynamics, implementation problems remain and take time to get resolved.



The RPL policy in Denmark is a success. It aims at providing opportunities to people for further education to make them more employable, enhance their income opportunities, and promote equality in the society in the long run. An alternative focus could have been provisions with a direct focus on labour market needs rather than further education (like in Finland) but the stakeholders in Denmark could not reach a consensus regarding this (Nordiska ..., 2003, pp. 63–64). The policy is based on the assessment of learning in all types of settings: formal, non-formal and informal. This is similar to RPL policies in other Nordic countries but different from the EU approach which does not include recognition of learning in formal settings<sup>5</sup> (Nordisk Ministerråd, 2003; EC, 2012). The Danish policy includes provisions for an assessment of *Realkompetence* provided at each preceding NQF (National Qualification Framework) level at each successive NQF level. With limited regulations (sticks), much of the policy implementation depends upon strong social capital (sermons) and the will of stakeholders motivated by long-term incentives (carrots) to support policy decisions.

It took decades to develop a functional policy design. In 1984, the Danish Parliament proposed a 10-points programme on the education and training of adults. Apart from other provisions, the programme proposed that all adults should have the right to get credits for their *Real Knowledge* (competencies) – irrespective of how they gained it (Folketinget, 1984). As per Danish regulations, the Danish government was free to take (or not take) action on the proposed programme since the programme lacked the status of an act or law. The 1984–2004 period was characterised by tripartite negotiations among the state and the social partners. A consensus to implement RPL in vocational education was achieved and in 2007 an act made it mandatory for all educational providers to offer RPL (Ehlers, 2005).

The influence of the NCM and the EU can be seen on the Danish act on *Realkompetence* that introduced the first full-fledged policy on RPL, thirty-five years after the UNESCO recommendation that pushed RPL onto the international policy agenda! The recommendations by the NCM (Nordisk Ministerråd, 2001, 2003) and the EU's standardised and integrated policy on Validation of Prior Learning for all member states under its Education and Training Strategy 2010 (Undervisningsministeriet, 2004) are reflected in the policy design (Ehlers, 2013). Apart from that, the Copenhagen Declaration on increased cooperation in European Vocational Education and Training (2002), the Maastricht Communiqué on Cooperation in European Vocational Education and Training (2004), the Council Recommendation in 2012 for the mandatory formulation of an RPL policy in each member state by 2018, and policy recommendations to cope with implementation challenges in member states in 2010, 2015 and 2016, all comprise the EU's RPL policy and have influenced the Danish policy as shown by annual Danish Country Reports to the EU regarding policy compliance (Ehlers 2013; Cedefop, 2019).

The current RPL policy design has four primary stakeholders who are engaged in micro-politics with each other. These stakeholders and their stakes (time and money) are presented in Table 1.

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5 In EU policies, formal learning is integrated into the pan-European credit transfer system and mobility policy.

Table 1: Stakeholders and Stakes in RPL in Denmark

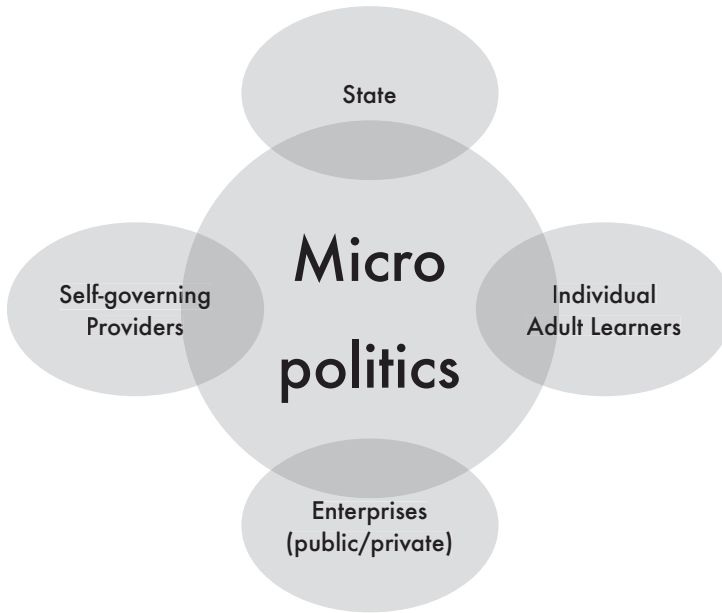
Stakeholder	Description	Stake (Reason for Micro-Politics)	Stand
State	<ol style="list-style-type: none"> <li>1. Funds the self-governing providers of adult learning on the basis of ECTS points<sup>&lt;=&gt;</sup> earned by individual adult learners;</li> <li>2. Funds the education of individual learners through formal channels.</li> </ol>	<ol style="list-style-type: none"> <li>1. RPL saves costs since learners can gain additional ECTS while the state has to pay less to providers, and individuals get paid by employers or associations;</li> <li>2. RPL saves time (resource) since the adult learner is back on the labour market in a very short time.</li> </ol>	Supports RPL.
Individual learners seeking RPL (over 25-year-olds)	Paid by employers, associations, or self-funded.	<ol style="list-style-type: none"> <li>1. Want to achieve better career opportunities, status and higher income;</li> <li>2. Want to save time and work rather than gain formal education.</li> </ol>	Support RPL.
Enterprises (public and private)	Supported by employer organisations.	<ol style="list-style-type: none"> <li>1. Get certified human resources;</li> <li>2. Save their own time and costs for assessing human resources;</li> <li>3. Get the possibility to enhance employee satisfaction by illustrating that learning occurs at the workplace and not only through formal education channels.</li> </ol>	Support RPL.
Self-governing providers of formal learning and RPL	<ol style="list-style-type: none"> <li>1. Paid by the state based on the total ECTS points they manage to 'sell';</li> <li>2. They are profit-optimisers.</li> </ol>	<ol style="list-style-type: none"> <li>1. Effective implementation of RPL threatens their 'monopoly' as providers of adult learning;</li> <li>2. Each time RPL is done, they lose an opportunity for 'selling' ECTS points and therefore funding possibilities.</li> <li>3. RPL requires special training for the assessors;</li> <li>4. Heads of provider institutions may not be willing to invest time and resources for the implementation of RPL.</li> </ol>	<p>Oppose RPL. They demand:</p> <ol style="list-style-type: none"> <li>1. compensation for the loss of funding possibilities due to RPL;</li> <li>2. additional funding to cover assessment costs.</li> </ol>

Source: Created by the authors.

Thus, despite a well-negotiated policy design, implementation challenges are a reality.

All primary stakeholders are engaged in micro-politics with each other while the providers demand more funds (since they are profit-optimisers) and negotiations about who should pay the costs continue, as shown in Figure 2.

Figure 2: Micro politics among stakeholders in Denmark



Source: Created by the authors.

A national evaluation (2010) argued for detailed provisions to ensure effective RPL in case the providers failed to deliver quality, advocated economic incentives to minimise the resistance of providers by accepting their demands for more funds, and recommended awareness creation regarding RPL in order to ensure effective implementation (Danmarks Evalueringsinstitut, 2010).

### **The Indian case**

India is characterised by a massive population, widespread poverty and resulting socio-economic problems, high unemployment, huge skill-gap, large informal sector, and sizeable number of non-literates and child labourers (Box 2). The high rate of school dropouts, limited access to higher education and vocational training, complemented by lack of adequate resources, infrastructure, and political will make learning in informal and non-formal settings necessary for the livelihood of millions. Adults without formal education work in the informal sector and struggle with exploitative social structures (like

the caste system) that also have occupational connotations.<sup>6</sup> They have knowledge and skills to earn a livelihood but a lack of formal certification forces them to survive at minimum levels of income and career possibilities. At the same time, traditional knowledge and skills that also provide identity to millions of people are on the verge of extinction due to lack of formal channels for imparting them to future generations. In a converging global economy, RPL is not only relevant to equip the working age population with adequate certification to find jobs but also for creating comparative advantage in areas of knowledge exclusive to traditional Indian culture. Competing in the international market requires not only lifelong learning but also the constant recognition of that learning. RPL is thus a relevant tool for addressing socio-economic challenges, promoting inclusive development and making a large part of the population employable.

Box 2: Statistics from India

- 1.3 billion population (2018)
- 4.6% (62.7 million people) live in extreme poverty without basic necessities
- 3.5% unemployment rate (18.6 million people) (2018)
- 81.1% employment in informal sector (2018) with limited or negligible rights and inappropriate working conditions
- 287 million non-literates (37% or more than one third of the global non-literates) (2011 Census)
- 10.1 million child labourers (2011 Census) with limited possibilities for formal education
- 1% of the people own 73% of the wealth (2018)

Sources: Government of India (GoI), 2011; ILO, 2018a, p. 21, 129; Oxfam, 2018.

RPL is included in the skill development policy and aims at promoting 1) social inclusion, 2) employability, and 3) more human resources in the Indian labour market to cater to global requirements for skilled labour. It follows a state-led policy design (since 2008) owing to the hierarchy in India where the government makes the policy and bureaucracy implements it. Only informal learning is recognised, and monetary awards are provided by the state to various stakeholders. Table 2 shows the milestones of RPL policy development in India.

The influence of the ILO is evident from Indian policy documents (based on terminology and provisions) and the ILO's RPL reports for India (Ummat, 2013; ILO, 2014; GoI, 2009; MSDE, 2015, 2017). The ILO has been doing a policy analysis of Indian initiatives and suggesting reforms based on best practices (ILO, 2014, pp. 15–18). It has highlighted that Indian initiatives were fragmented and even though they exceeded their target in numbers, they were ineffective (in terms of quality) between 2008 and 2013 (Ummat, 2013, pp. 2–3).

<sup>6</sup> The caste system (social stratification) in India has been associated with people's professional identity for centuries and the nomenclature for many castes/social groups emanates from certain traditional professions/jobs.

Table 2: Timeline of RPL Policy Initiatives in India

Year	Programme	Source Ministry	Focus of the Initiative
2008	Part of Skills Development Initiative Scheme, Modular Employable Skills	Ministry of Labour and Employment	<p>Launching RPL:</p> <ol style="list-style-type: none"> <li>1. Focus on skills;</li> <li>2. Only informal (experiential) learning included;</li> <li>3. Aimed at enhancing employability, promoting social inclusion and adding up to the country's human resource;</li> <li>4. Offered: a) better employment and formal education possibilities to applicants; b) certified human resources to employers saving their assessment costs; c) reimbursement of assessment costs to providers.</li> </ol>
2012	RPL linked to National Vocational Education Qualification Framework	Ministry of Human Resource and Development (ministry responsible for education)	Standardisation of prior learning to establish equivalency between formal learning certification and certification from RPL.
2013	Skill Knowledge Provider Scheme	Ministry of Human Resource and Development	Direct pathway provided from informal learning to formal education based on assessment by linking it to offers for further formal education.
2013	Skill Training Assessment and Reward Scheme	Ministry of Finance	Monetary award to applicants for getting their skills recognised.
2014	Initiative under the National Institute of Open Schooling	Ministry of Human Resource and Development	Assessment of the prior learning of dropouts from the formal system by accepting different types of evidence like pictures, reports from supervisors, videos and the like.
2015	Guidelines on Recognition of Prior Learning Under the Prime Minister Skill Development Scheme	Ministry of Skill Development and Entrepreneurship	<ol style="list-style-type: none"> <li>1. Consolidated policy on RPL including existing provisions but with more weightage to actors from the market.</li> <li>2. Highlighting the social value of RPL by providing: <ol style="list-style-type: none"> <li>a) recognition to traditional job profiles to provide social prestige to selected traditional practices for livelihood and formal recognition to their contribution to national income;</li> <li>b) recognition to informal learning models where no alternative formal models exist to conserve the existing knowledge and skills.</li> </ol> </li> </ol>

Source: Created by the authors based on Ummat, 2013; ILO, 2014; GoI, 2009; Ministry of Skill Development and Entrepreneurship (MSDE), 2015, 2017.

The ILO thus recommended a consolidated policy to create impact and highlighted the need for adequate data generation in order to keep track of whether the initiatives were able to recognise learning relevant for the labour market or were merely adding to the number of unemployed people with skills that were not demanded in the market at all. Stakeholder coordination was limited, many State<sup>7</sup> governments showed inadequate engagement in policy implementation, adequate awareness and information was lacking, changes in skill standards were required, and the policy lacked attraction for applicants as well as providers (Ummat, 2013, p. 3). The management, administration and financing of the policy was complicated and weak, monitoring was inappropriate and delayed, skills and skill-standards were not updated for long, the number of facilitators was inadequate, assessments were not standardised and were delayed. On top of that, the certification was not accepted by many employers, including several government ones (Ummat, 2013, p. 9).

In 2015, consolidated guidelines were issued to put together all fragmented initiatives and the ILO recommendations seemed to be accepted. Despite much contribution in voicing the concerns in the informal sector and providing RPL offers in sectors where government and market initiatives are missing, civil society actors like LabourNet (ILO, 2014, p. 10) were given limited space in policy and not even identified formally as stakeholders. Furthermore, no provisions for data generation and policy evaluation were introduced, thus making the provisions more symbolic than effective. The acceptance of RPL certification is not mandatory for governmental or non-governmental actors because of which it does not necessarily lead to employability. Data regarding how many people have been placed in jobs after certification under the policy shows that most applicants who were provided certification were already employed before applying and a very trivial number of applicants received new jobs (The Indian Express, 2016). However, the data does not transparently show how the chances to negotiate better contracts at work or increase in salary etc. changed for the applicants due to certification. A major contribution of the policy seems to be (there is no accurate official data regarding this) the inclusion of those in the informal sector due to absence of any certification in the formal sector.

In 2018, 54.4 per cent of Indians are not employable (looking for jobs with required degrees and certifications but lacking the knowledge, skills or competencies to fit the requirements of the jobs in the labour market) (Wheebox, 2018, p. 44). This means that provisions for the recognition of learning outcomes (and not only skills) from non-formal and formal settings like in Denmark have to be included. RPL may not be very fruitful until acceptance of certification through RPL is made mandatory and jobs are available in the market for those who get their skills recognised. Furthermore, cost sharing is another relevant concern since the state is providing monetary rewards to the providers and the applicants, but the approach is unsustainable. Finally, the challenge of policies based on short-term political interests and electoral politics (British Council, 2014, p. 13) has to be addressed to ensure the long-term sustainability and effectiveness of policy solutions.

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7 Federal units in India are known as States like, for example, Landers in Germany, Regions in Denmark and Provinces in Canada.

## COMPARISON AND DISCUSSION

The analyses of RPL in Denmark and India show that the two policy designs are very different and the contexts within which they are embedded are contrasting. Ehlers' (2005) identification of ideal types facilitates the understanding of fundamental differences in the structure and function of RPL and the elements they comprise of.

While the Danish policy design is partner-led and bottom-up, the Indian policy is state-led and top-down. The Danish policy has successfully evolved over decades from a cultural-social policy on providing rights to under-privileged groups to an economic policy on enhancing the employability of the working population as such, increasing productivity in the economy, and saving costs for the state. The evolution of the Danish policy from cultural-social to economic policy has been guided by stakeholders and their respective interests within the far-sighted policy framework for constant development and ensuring equality among citizens. These stakeholders have been influenced by transnational actors, especially the EU and the NCM. The Indian policy design has been influenced by the ILO. However, the policy design is top-down and the voices of all the stakeholders are not heard. This hampers the process of policy evolution according to contextual needs. The problem is further accentuated by the absence of mechanisms for data generation, control, evaluation and impact assessment. Without any feedback and adequate information regarding policy implementation, the initiatives remained fragmented and of poor quality in the beginning. The consolidation of initiatives after the ILO's recommendation also proved futile because no major structural-functional changes were made. All this indicates that the policy is symbolic and motivated by short-term political gains, no matter what goals are mentioned in the policy documents.

Despite the fact that the state pays all major costs for RPL in India and even provides rewards and compensation to the primary stakeholders, the policy has failed to achieve its outcomes. RPL policy is a *cost* for the Indian state. On the contrary, even if the different stakeholders in Denmark continue to negotiate about who should pay the costs for RPL, effective outcomes have been constantly achieved and the policy is an *investment* for the Danish state. The most problematic area in India is a symbolic policy design, whereas in Denmark, it is policy implementation influenced by micro-politics.

Apart from all this, contextual differences between the two countries are stark. The quality of RPL in Denmark is assured to be the same as that of a certification from formal education, the Danish labour market has the capacity to absorb all those who get RPL, and constant negotiations among stakeholders ensure that the policy adapts to changing needs. In India, quality is not assured, only informal learning is recognised, and certification is not accepted everywhere. Furthermore, RPL might merely add to the number of skilled unemployed people in India and pose additional macro-level challenges for the government and thus remains a low priority.

The evolution of RPL policy in India and Denmark is fundamentally different, aiming at different objectives, adopting different pathways and engaging different stakeholders.

However, the comparison makes it evident that a combination of policy designs with administrative principles and policy instruments is required to make it a success. For instance, in the Indian case, providing carrots (monetary rewards) did not make the policy effective. Ehlers emphasises the possibility for different policy designs while Winter points out the different stages and crossroads where policies could fail. Thus, a combination of policy instruments to implement a policy design by overcoming the friction generated by administrative principles in a given context may ensure effective outcomes for RPL policy.

## CONCLUSION

A policy can be defined as a statement of intent by the stakeholders who formulate it. RPL has developed from a *social policy for the inclusion of the under-privileged* to an *economic policy for promoting employability for all* in Denmark. In India, it was adopted as a socio-economic policy for inclusion but has evolved into *political symbolism*. The most important factors leading to these developments in the two contexts have been: 1) the engagement of stakeholders in the policy process, 2) ownership and accountability leading to policy implementation in the short run and policy evolution in the long run; and 3) the use of an appropriate mix of policy instruments (carrots sticks and sermons) that enable the implementation of a certain policy design in a certain context with administrative principles and political, social and economic realities.

With the network administrative principle, all stakeholders have space to negotiate and influence the policy design. When they cannot get their interests included in the policy design, they manage to do it through micro-politics during policy implementation. Since the policy depends upon negotiations and is constantly changing, the accountability of stakeholders cannot be fixed but they take ownership, motivated by possibilities for the fulfilment of their interests. The policy evolves based on the negotiations among stakeholders gradually. Political, social and economic realities like unemployment rates and short-term or long-term policy considerations play an important role in all stages of the policy process.

The hierarchy administrative principle means that the space for voicing stakeholders' concerns is already limited and pathways to include them in a bottom-up fashion need to be created using a mix of policy instruments. In the case of India, the policy design proposed by the ILO is adopted by the state with much leverage to the market but with no concrete mechanism for policy evaluation and data generation, and with no involvement of other stakeholders. This leads to limited accountability, negligible control and inadequate transparency at all stages of the policy process. Neither the state nor the market actors take ownership since the policy design does not create a need for it. Other stakeholders like civil society organisations find engagement either difficult or irrelevant.

Thus, irrespective of policy design and contextual factors (including administrative principles), an appropriate mix of policy instruments, the engagement of all stakeholders and



ownership or accountability through systematic processes (like adequate documentation and data generation) are required for effective policy outcomes.

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