

LLL Response to the Call for Evidence for the Skills Portability Initiative (SPI)

Introduction and policy background

The [Lifelong Learning Platform](#) – European civil society for education (LLL) is very active in the topic of skills since its creation 20 years ago. It has followed closely and contributed to main EU policy developments in this area, such as the Council Recommendation on the validation of non-formal and informal learning (2012), the Council Recommendation on upskilling pathways (2016), the Council Recommendation on Key Competences for Lifelong Learning (2018), the European Skills Agenda (2020), and more recently, the Union of Skills (2025) and its policy packages. Among LLL's 45 member organisations, many are also active in this field. This contribution to the call for evidence reflects the views of the organisation it represents. Several organisations have been consulted in preparation of this paper via 1-to-1 meetings and participation in two meetings of the LLL Validation and Recognition Working group (November 2025, February 2026).

LLL is a member of the European Commission DG EMPL ESCO working group, the European Qualification Framework Advisory Board (EQF AG), Europass Advisory Group, it officially supports the work of the European Parliament Intergroup on the Future of Education and Skills for a Competitive Europe Secretariat and was a key partner in the European Erasmus+ policy experimentation project [TRANSVAL-EU](#), which was about the validation of transversal skills.

Beyond skills, we closely follow educational issues in other sectoral policies (new migration strategy, new VET strategy, labour mobility package and digital tools for learning and credentials). In previous years, it has contributed to highly relevant policies in the context of this Call for evidence, including the Council Recommendations on microcredentials, individual learning accounts, and the European Pillar of Social Rights.

It regrets however that the call for evidence omits important policies in the part on the political context: the Council Recommendation on validation of non-formal and informal learning, the new VET Strategy, and policies in the field of adult education the upcoming "choose Europe" initiative, the European Skills High level Board and Talent Partnerships, as well as JRC's competences frameworks.

This paper follows a thematic structure but with divisions according to the three actions. **Action 1 is the most relevant Action for the stakeholders that we represent but some of our points below are also relevant for Action 3.**

The challenges regarding skills portability

The LLLPlatform welcomes the EU ambition to improve learning and career mobility, reinforce the transparency and trust on skills and qualifications and further expand digital solutions. However, this initiative raises more questions at this stage, than it provides answers. The barriers that prevent workers from moving from one country to another are often the same that prevent learners' mobility. It is for the latter that it is most relevant for us: the **mobility of learners**. However, we also stress the prevailing issues of recognition and validation within individual Member States. Around half of EU Member States do not have a validation system in place and validation is stated as a solution in both Action 1 and Action 3. Both *between* and *within* countries, the main issues are the **lack of shared understanding, mutual trust and transparency** between countries, which is reflected in insufficient policy coherence. The SPI however bears opportunities for bringing more policy coherence and reinforcing the digitalisation process.

An opportunity towards shared understanding?

The first step this Initiative must take is to provide a clear definition of what "skills portability" means. It is a relatively new concept for our stakeholders and they are not familiar with it. The Initiative is also complex in the sense that it covers many different concepts, processes, target groups and therefore policy fields. There are skills and qualifications on one side, recognition and validation on the other side. Stakeholders have different definitions of these concepts which poses several issues.

Recognition is a term most popularly used in the higher education context to refer to the **formal recognition of qualifications**. The Bologna process and international conventions have supported progress in this area in the last decades. We will address some of the pending issues below. A stakeholder we have consulted representing the Open Recognition Alliance has a more open definition, where recognition can be "formal" but it can also be "social" (see under Case study, a publication with more detailed explanations). Does the initiative only refer to formal recognition of qualifications? What about the concept of RPL - Recognition of prior learning, which [in Ireland](#) can also cover non-formal learning experiences, similarly to validation processes? Can the EU foster coherence and harmonisation in that respect?

Qualification frameworks define the learning outcomes expressed in terms of "**knowledge, skills and autonomy-responsibility**". Stakeholders have raised concerns about a **lack of coherence between EU policies**, notably, the 2017 EQF Council recommendation, the 2018 Council Recommendation on key competences and Joint Research Competence frameworks

where competences are defined as “knowledge, skills and attitudes” and the work being done under the ESCO project, which focuses on skills and occupations. Stakeholders expect more clarity on how the EU will improve coherence between those policies.

Recommendations:

- Action 1: Promoting and supporting a wider semantic understanding and interoperability of skills and competences (for example through ESCO and competences frameworks).
- Action 1: This coherence could be improved by mapping skill taxonomies to EQF.

Fostering the mobility of workers and learners irrespective of where their learning happened

When dealing with skills, it is **difficult to untangle the workers’ status of an individual from its learner status**. In that sense, while the SPI is more explicitly addressed to workers, it targets all EU citizens as learners. According to the European Commission’s own understanding, labour market competences are also aligned with life competences, therefore, the SPI must take into consideration a wide array of skills and that includes **transversal skills**. EU workers’ mobility is a freedom and a right but many barriers subsist. Depending on where one’s learning is acquired, the barriers differ. For instance, there are even stronger challenges for the recognition and mobility of **VET and non-formal education learners**. The latter is still facing challenges for recognition towards national qualification systems.

Employers (except perhaps for the public sectors and regulated professions), do not always require candidates to show certificates of recognition for their qualifications. But they do, however, struggle to assess workers’ skills, not only in terms of what skills they have, but more specifically what is their level of competence (e.g. foundational, intermediate, advanced, expert). For employers but not only, it would be crucial to advance the **identification and comparison of skill levels**. It is challenging to recruit only based on the self-expression of skills acquisition compared to having a clear quality assured system for skill levels. So far, only the following competence frameworks developed by the EU features **skills proficiency levels**: Digicomp (8 proficiency levels), ResearchComp and Competence Frameworks for Policymakers and Researchers (both with 4 proficiency levels). Another great example for skills portability is coming from the **language field with European standards** understood across countries. **This is probably one area where the Union of Skills can contribute, alike to EQF’s compatibility function for qualifications levels, a similar system could be put in place for skills, which would support comparability and trust across the Union and facilitate workers’ mobility.**

So far, 20 countries still do not include all NQF qualifications in an online database, and six EQF countries do not have an operational database or register at all (Cedefop, 2025) which limits even more recognition between countries. Overall, there is a **lack of awareness** among stakeholders and end-users (workers, learners, employers, NGOs, non-formal training providers)

about NQF and how to use it. The workers, jobseekers and learners are those who know less about NQF compared to education providers and employers (Cedefop, 2025).

Recommendations:

- Action 1: Encourage EU Member States to facilitate VET learners mobility
- Action 1: Continue to monitor and showcase progress for the visibility of the non-formal education sector
- Action 1: Taking example from the well-established scientific approach, the “rubric-based methods” and the JRC’s competence frameworks, the EU could develop a similar system to support comparability and portability of not only skills, but competences (as knowledge, skills and attitudes)

Can the SPI help increase trust and transparency?

One of the main aims of the SPI focus is to improve the transparency of skills and qualifications (Action 1), however it is yet unclear how it plans to do so. Currently, this trust is being built in a patchwork pattern of bilateral agreements between countries, institutions, or projects. Progress is slow because there are thousands of qualifications at play. For instance, at the moment, there are still very few automatic systems of recognition in place for qualifications between EU countries, only 7 regulated professions (out of 5000) allow for cross-border mobility (Action 2). In many cases, recognition *within* the same country is not made possible, for instance between different education and training providers, between different regions with different education systems, authorities and regulations (Belgium, Italy, Germany are some examples).

This reality also reflects a long-lasting issue of trust, which affects mainly learning outside formal settings (Cedefop, 2024). The Skills Portability Initiative is an **opportunity to reinforce cooperation exchange between education and training stakeholders but also public employment services, quality assurance authorities and other relevant authorities such as validation and guidance centres, and social partners (chambers of employers, employees, and trade unions).**

While our VET members are calling for a “[Bologna process in VET](#)”, notably with a focus on advancing mobility and recognition in higher VET for EQF Level 5 qualifications and enhancing cross-border mobility schemes, our stakeholders do not necessarily believe that integrating non formal learning in EQF is the solution. EQF and NQFs could remain a tool for formal qualifications while ESCO and/or similar tools/frameworks, could become the "semantic exchange token" for skills, competences frameworks for competences. Each Member States and authority would then need to ensure a certain level of alignment with these main frameworks (a bit as it is already in place with EQF and NQFs), but also keeping flexibility in adapting and including national skills/competences frameworks, and sectorial ones.

Recommendations:

- Action 1: Better align national qualification and skills frameworks within and across Member States. Share examples of countries that have connected their NQF to skills taxonomies/classifications (e.g. NL)
- Action 1 & 3: Supporting awareness raising and capacity building with adequate funding of professionals who directly contribute to skills portability (guidance, validation, recognition, etc) e.g. Public employment services, training providers, NGOs etc on how to make use of the online service and to communicate about it.
- Action 1: Awareness raising for EU citizens (workers and learners) about the possibility offered to them (mobility, skills and qualifications, recognition)
- Action 1: Consider the possibility for a Council Recommendation on Lifelong Guidance to support the implementation of Skills Portability Initiative.

How can SPI make learning more visible?

According to the Study supporting the evaluation of the Upskilling Pathways Council Recommendation, 12 EU Member States have not advanced on the development of validation systems, while 8 others have advanced only slowly (European Commission, 2022). Out of 27 EU Member States, only 7 have developed robust validation and recognition systems. The SPI brings potential for making this policy a reality in all Member States but **validation is more an national issue rather than an inter-national issue**. Said differently, it should be a priority for Member States to allow individuals to make their learning visible before thinking of the mobility aspect. That being said, migrants are a key target group who can also benefit from validation provisions (Action 3). According to the EU Inventory of VNFIL (2023), within EU countries, there is still a high fragmentation of the validation systems which are multi-speed, highly developed for certain sectors, target groups while inexistent for others. The fragmentation is also reflected by the diversity of competent authorities in charge. Here also, more cooperation would ensure seamless learning and career pathways. What the EU can do is to **ensure validation standards** so that the certificates people acquire as a result of validation are equally valid in other EU countries.

Another challenge regarding the validation process is the general lack of awareness of stakeholders and EU citizens about what validation is and how it works (European Commission, 2023). **It is thus expected that the SPI will address the issues of guidance and capacity building of professionals working in and around these essential processes, in order to improve access, uptake, and thus, the implementation of existing policies.** Awareness insufficiency is closely connected to the issue of the lack of guidance and information on processes for recognition & validation: who are the responsible authorities, length, cost of process. The training providers have a role and a responsibility to play as well to support the outreach and information dissemination for their learners on existing services and opportunities, as well as to embed structural capacity building and self-empowerment activities, within their learning programmes,

for learners to be able to self-assess and describe their own skills and competences. The EU can support them in that endeavour.

Another pending issue is the **generalised lack of data on validation**: who takes part, for which qualifications or skills? Data on uptake, inclusion, outcomes and impact of validation is often scarce or questionable¹. In our analysis of the Cedefop VNFIL Inventory reports on the VNFIL Information Hub, we could find that 2 EU countries collect data on validation users (EE, SK), 8 countries collect some data (BE-FL, BE-FR, CY, CZ, FR, GR, IT, HU, PT), 9 countries have very limited data (BG, FI, DE, IE, LV, PL, RO, SL, ES) and for 2 countries this was not indicated (NL, SE). When countries have “some data” it is often collected in the context of one-time studies or for certain specific sectors, or by specific institutions. When it is “very limited” it is often declarations without associated numbers that provide vague indications regarding the profile of candidates or those are data collected as part of time-bound projects. The type of data that is collected is the number of candidates, age, gender, citizenship status, level of education, work status, qualification pursued, and motive for validation. **Thus, the SPI should foresee a chapter on how to improve data collection, and skill monitoring. Improving data collection on skills and validation overall can fuel skills intelligence, which is another important priority at EU level, currently.** It can also help to set up targets and monitoring indicators and it is the foundation for designing **evidence-informed policies**.

Recommendations:

- Action 1 and 3: The EU can create a European framework for validation & recognition. The framework should include a broad understanding of validation (not just for full qualifications; summative purpose) but also validation for formative purpose (e.g. when not all 4 steps are completed) as it is often implemented in the third sector.
- Action 1 & 3: The SPI can support making validation processes faster and less costly e.g. by the means of microcredentials (validating specific skills instead of full qualifications); or by strengthening access and information about partial qualifications and exemptions.
- Action 1: The EU framework would foresee each Member States to have one authority coordinating the different validation bodies and each country should make information clearly available about who are the competent authorities and encourage cooperation between them.
- Action 1 & 3: Increase access and uptake of validation in EU Member States by ensuring each country has developed guidance strategies, helping to raise awareness of stakeholders, particularly end-users. Implementation is now the main element to look at for validation policies. Guidance provisions should provide information on validation: where, how, how long, for whom etc.
- Action 1: Improve data monitoring systems on validation, to open the path for setting targets and other quantifiable indicators for validation (uptake, trades, outcomes).

¹ Questionable in the sense that the data is obsolete or inadequate. In a few cases, the data available on validation is actually data on recognition of prior learning, which may be explained because most EU countries do not have a validation system in place.

Capitalising on contemporary innovations in the field of learning and credentials systems - how can SPI bring new innovations to credentials systems?

Finally, in the context of the development of microcredentials by multiple actors across the EU, the SPI should support the portability of skills developed in this context. The required information that is described in the Council Recommendation on microcredentials could be similarly required for any learning experience (and associated credentials). **The digital and green sectors could be seen as strategic sectors for experimentation in skills portability.**

Similarly, several countries are working on developing individual learning accounts. Those are sometimes (as it is the case in France) opportunities for digital wallets of credentials. Individuals can have all their credentials and certificates in one place. They could carry those when moving to another country. **The Skills portability initiative can support inter-operability between different systems, which is a key challenge for this decade.**

Europass is a tool still mostly known for creating CVs, it is not yet very well known as a portfolio or skills wallet, however, its revision has brought a number of new features improving the skills visibility in the CV and linking it to certificates and EQF levels. An important question is how in the framework of the SPI we will build upon the lessons on Europass and how it will be used to create the skills wallet? What will be the future of Europass in the SPI? How would it combine with EU Digital Identity Wallets? Other digital initiatives such as the European digital credentials, and the European learning models, are yet little known and deemed too complex to use by the stakeholders we represent. They are not aware of the benefits of using them.

The digitalisation of credentials (diploma, certificates) in all sectors of education (adult education, higher education, VET, non-formal, school, work-based learning etc) could support moving forward and faster, automatising certain recognition processes. Digitalisation innovations can support ensuring the verifiability and reliability of the acquired learning outcomes.

Recommendations:

- Action 1 and 3: The EU could foster developments in the most pressing sectors. For both green and digital skills, there are competence frameworks which can be used as a basis for skills portability mechanisms, using ESCO but adding competence levels to support employers' understanding.
- Action 1: Europass can be a multilingual online one-stop-shop for core information on cross-country mobility opportunities ensuring connectivity and interoperability with other EU tools and platforms e.g. ESCO, integrating Digital wallets, etc.
- Action 1: The EU could set up targets for a majority of certificates to be digitalised in a secured way (and verifiable/sealed/ID) by 2030
- Action 1: The EU could set up a European standard template for documenting the outcomes of skills validation using Europass, digital credential for learning and tied with the European Digital wallet. Ensuring the inter-connection and transferability between individual learning accounts as learning wallets with digital wallets.

- Action 1: It should be made more user-friendly to create digital credentials for the issuer (European digital credential for learning) and the user. Any education providers from formal and non-formal education (schools, HE, VET, adult learning...) could digitalise their diploma & certificate on the platform, with translation thanks to the use of ESCO.
- Action 1: Set up a Digital Competence Profile aligned with DigComp and linked to digital wallet, which can more easily spotlight digital competences among the existing EU tools.

Fragmented policies

The following EU policies and initiatives - EQF, ESCO, Eures, Europass, European learning model, European digital credentials for learning, EU Digital Identity Wallets, individual learning accounts, and validation systems - remain quite fragmented; they solve a piece of the puzzle but not the entire puzzle providing different solutions often not compatible or interoperable. It's not clear how they are linked. The lack of **integration of initiatives is still a major concern** but also an area where we believe the SPI can strongly contribute. It is an essential issue of inter-operability between systems, particularly digital systems. For instance, registries of adult education (ALE registries) and individual learning accounts instruments (ILA portals) should be designed having this criteria as core design feature, to support a full learners/workers-centred approach. An example from EAEA's project, RALEXILA is included below. The system model and prototype they developed for ALE registries and ILAs systems support interoperability with ALE and ILA national systems, and also features essential functions for skills portability (aligned data models). This is a very good example of how a platform can integrate different aspects in one place: learning opportunities, skills & certificate wallets, funding allocation, and data-driven policy support.

Regrettably, there is little policy connection and coherence around competences policies and initiatives, particularly, JRC's competence frameworks, and EU skills policies and tools such as ESCO. The EU competence frameworks are often solicited by DG EAC but then, they are not sufficiently considered by DG EMPL. The Union of skills can only be made possible if we all speak the same language regarding skills and competences, with competences being understood and defined as skills, knowledge and attitudes (as mentioned before). The SPI shouldn't neglect this effort. In that context, more connection between EU initiatives (EQF, ESCO) and national initiatives (NQFs, skills taxonomies) could be a key priority of the SPI.

Recommendations:

- Action 1: More coherence is needed between EU policies, e.g. by making sure they share the same language (competences² as skills, knowledge and attitude³; learning outcomes)

² The SPI should not be just about skills but a broader understanding of competences as defined in the competence frameworks.

³ In EQF, the following categories are featured: "Knowledge", "Skills" and "Responsibility and autonomy". The latter category is not repeated in other policies.

- Action 1: Technical and semantic inter-operability as an essential criteria in the design of the national adult education and ILA systems.

EU projects for evidence

TRANSVAL-EU (2021-2023)

Transval-EU was a policy experimentation project funded by Erasmus+. The aim of TRANSVAL-EU is to experiment on how to make those skills more explicit and to embed the lessons learned in validation and guidance provisions. TRANSVAL-EU proposes innovative approaches for the validation of transversal skills acquired through non-formal and informal learning (VNFIL), which will be tested in five pilot countries – Austria, Belgium, Italy, Lithuania and Poland. One of the interesting outputs produced in the project was a [European Policy Coherence Report on skills and competences](#).

Digicards (Erasmus+, 2024)

In 2024, LLLP was a partner in the Digicards project which aimed at developing digital competence cards for counselling services. The project had a focus on transversal skills and one of the main outcomes and outputs of the project was putting [all transversal skills](#) from 7 different competence frameworks and ESCO transversal skills mapping together with descriptors and clusters. Project website: <https://digicardstool.eu/>

Open recognition alliance

Open Recognition is an approach born out of the practice of open badges that explores and promotes practices, tools and policies that improve and expand the opportunities for individuals and communities to be recognised and to contribute to the recognition of others. Its principles are described in detail in:

- The [Bologna Declaration on Open Recognition](#) (2016), which gave rise to the [Open Recognition Charter](#)
- The [Paris Declaration on the Equality of Recognitions](#) (2024)
- The [Open Recognition Manifesto](#) (2025)
- The [Recognition Practices Occupational Framework](#) (2025 – work in progress)

One of the very interesting works in the Occupational framework is a typology of recognition contexts and modalities.

RALExiLA (2023-2025)

RALExiLA is an initiative co-funded by the European Union to develop a **model for national registries for adult education** to support the implementation of **individual learning accounts** in European countries. The RALExiLA approach proposes a foundational model that is scalable at

national level across Europe, promoting interoperability and accessibility, for learners and providers.

RALExILA proposes a structured model to develop interoperable registries of adult education learning opportunities that are:

- Based on European models and infrastructure and expanding them (ELM, EDCI, micro-credentials)
- Embedding common semantic operators to describe skills and competences, both for learning outcomes (learning opportunity) and credentials (learning achievements), such as for example ESCO and/or similar skills and competences frameworks
- Enabling access for all type of training providers and type of programmes (including non formal sector)
- Expanding the expression of quality assurance capabilities beyond only formal accreditation systems and certifications

RALExILA is also organising ad hoc online demos and workshops on RALExILA proposed system model and approach with specific groups of stakeholders on demand (organisations, networks, delegations etc.).

Publicly available results

- Research report on ALE and ILA ecosystems in 10 European countries, including analysis of ALE registries
- https://ralexila.eu/wp-content/uploads/sites/91/2025/05/Ralexila_Del-2.1_FIN_EN.pdf
- Presentation on the RALExILA core system model
https://www.cedefop.europa.eu/files/day_1_wg_digital_platforms_pinzi.pdf

The final version of RALExILA main output will be published in early March:

- RALExILA - The Essential Guide to ALE National Registries and ILA platforms (handbook to co-design the systems)
- RALExILA System Model: Building an Interoperable Ecosystem for Adult Learning Registries and Individual Learning Accounts in Europe (technical guidelines)

References

European Commission: Directorate-General for Employment, Social Affairs and Inclusion, ECORYS and 3S, Study supporting the evaluation of the Council Recommendation of 19 December 2016 on Upskilling Pathways – New opportunities for adults – Final report, Publications Office of the European Union, 2022. <https://data.europa.eu/doi/10.2767/997479>

Cedefop, & European Commission (2024). European inventory on validation of non-formal and informal learning 2023 update: Overview report. Publications Office of the European Union. <https://data.europa.eu/doi/10.2801/64271>

Cedefop. (2024). Transparency and transferability of learning outcomes: a 20-year journey: Analysis of developments at European and national level. Cedefop research paper. Publications Office of the European Union. <https://data.europa.eu/doi/10.2801/3413866>

Cedefop. (2025). Making qualifications and skills more visible: the potential of national qualifications frameworks (NQFs) in the Union of Skills. Cedefop policy brief. Publication Office of the European Union. DOI: 10.2801/8809317.
<https://www.cedefop.europa.eu/en/publications/9207>

Cedefop (2025). Cedefop information hub on validation of non-formal and informal learning.
<https://www.cedefop.europa.eu/en/tools/validation-non-formal-informal-learning>.