

2018

Inclusion of Non-formal "Certificates" in the Qualifications Framework in Hungary

Erzebet Szlamka

Educational Authority of Hungary

Zoltan Loboda

Centre for Digital Pedagogy and Methodology of Hungary

Eva Tot

Follow this and additional works at: <https://arrow.tudublin.ie/level3>



Part of the [Educational Assessment, Evaluation, and Research Commons](#)

Recommended Citation

Szlamka, Erzebet; Loboda, Zoltan; and Tot, Eva (2018) "Inclusion of Non-formal "Certificates" in the Qualifications Framework in Hungary," *Level 3*: Vol. 14: Iss. 1, Article 2.

doi:10.21427/D78Q7K

Available at: <https://arrow.tudublin.ie/level3/vol14/iss1/2>

This Article is brought to you for free and open access by the Current Publications at ARROW@TU Dublin. It has been accepted for inclusion in Level 3 by an authorized administrator of ARROW@TU Dublin. For more information, please contact arrow.admin@tudublin.ie, aisling.coyne@tudublin.ie.



This work is licensed under a [Creative Commons Attribution-NonCommercial-Share Alike 4.0 License](#)

Inclusion of non-formal 'certificates' in the qualifications framework in Hungary

Authors:

Erzsébet Szlamka

Head of Unit for International Affairs, Educational Authority of Hungary

Zoltán Loboda

Head of Unit, Centre for Digital Pedagogy and Methodology of Hungary

Éva Tót, PhD, education expert

Abstract

This article describes the findings of empirical research conducted in Hungary in 2017 for a Country Report under the EU Erasmus+ Project: NQF-IN - *developing organisational and financial models for including non-formal sector qualifications in national qualifications frameworks*. The research involved interviews with non-formal training providers focused on the possibilities and obstacles of inclusion of 'certifications' issued by non-formal training providers into the Hungarian Qualifications Framework. According to the interviewees, current regulation requires a lot of administration thereby hindering the flexible organisation of training, limiting the tailoring of training to customers' needs, and resulting in the loss of ownership of their own programmes through the licencing process. In addition, employers have little confidence in 'paper' qualifications: they are more confident in their own competence assessment methods. As a result, instead of creating transparency, the training sector is divided regarding the principle that output regulation based on learning outcomes will only be implemented in a narrower, regulated sector.

Key words: non-formal training sector; regulation of national qualifications framework; non-formal training certifications; interests of non-formal training providers.

1. Introduction

The NQF-IN project aimed at developing organisational and financial models for including non-formal sector qualifications in National Qualifications Frameworks. The Hungarian partner in the project conducted empirical research based on semi-structured interviews with different stakeholders of the training market in order to explore the Hungarian adult training sector as a context. According to the objectives of the project, the research focused on the eligibility of 'certifications' issued by non-formal training providers for inclusion in the NQF.

In this article we distinguish qualifications recognised by the state from the certifying documents issued by the non-formal training providers, which we call 'certificates'.

2. Research Methods

Eighty semi-structured interviews were conducted for our research. The interviewees were mainly managers of adult training companies or HR managers of large companies. Some interviews were also conducted with sectoral professional advocates, with adult training experts and with representatives of a specialised field of expertise such as sports experts, and ECDL agents. In the course of the interview series, we tried to reveal the different types of certificates issued by training providers: what market considerations are behind their practice; what role regulation plays in their operation; and what kind of factors result either in their integration or exclusion from the state-regulated adult training sector. Due to the number of interviews, we did not aim at representativeness: the goal was rather to identify diversity and broad characteristic approaches.

We interviewed twenty-eight leaders of organisations delivering adult training as a main activity. Among them, there were eight well-established, multi-decade, large training companies operating at a national network level. The main provision of these trainers is counselling, organisational development, leadership training nationally and internationally. Among the training providers interviewed were an IT training company, a small company specialising in information technology, and two micro-enterprises. There were also interviewees from higher education institutions, as well as four adult training and sports training experts. We interviewed senior executives and HR managers of eight industrial production companies based mainly in rural towns, and other eleven companies: a regional utility; transport and carrier companies; logistics service providers; banks and insurance. Each organisation delivers training for its own employees. Therefore, they also work as training providers and training organisers. The ten IT software development companies interviewed also work in such a dual role. Nine interviewees were involved in some kind of professional advocacy for a particular branch of industry, or were heads of a professional association of a sport. Some of them have also expressed themselves as employers or as experts in a profession, as well as in training. Some of the interviewees could be classified into several groups simultaneously.

3. The sub-sectors of non-formal training in Hungary

As an analytical framework for our data and to assist the reader in understanding the complexity of the education and training landscape, we created a typology of the actors in the training sector in Hungary.

In Hungary, the Adult Training Act 2013 covers a relatively narrow section of adult training activities. Training programmes where the state has primary responsibility for content and are financed by government or by EU funding, fall under the scope of the law.

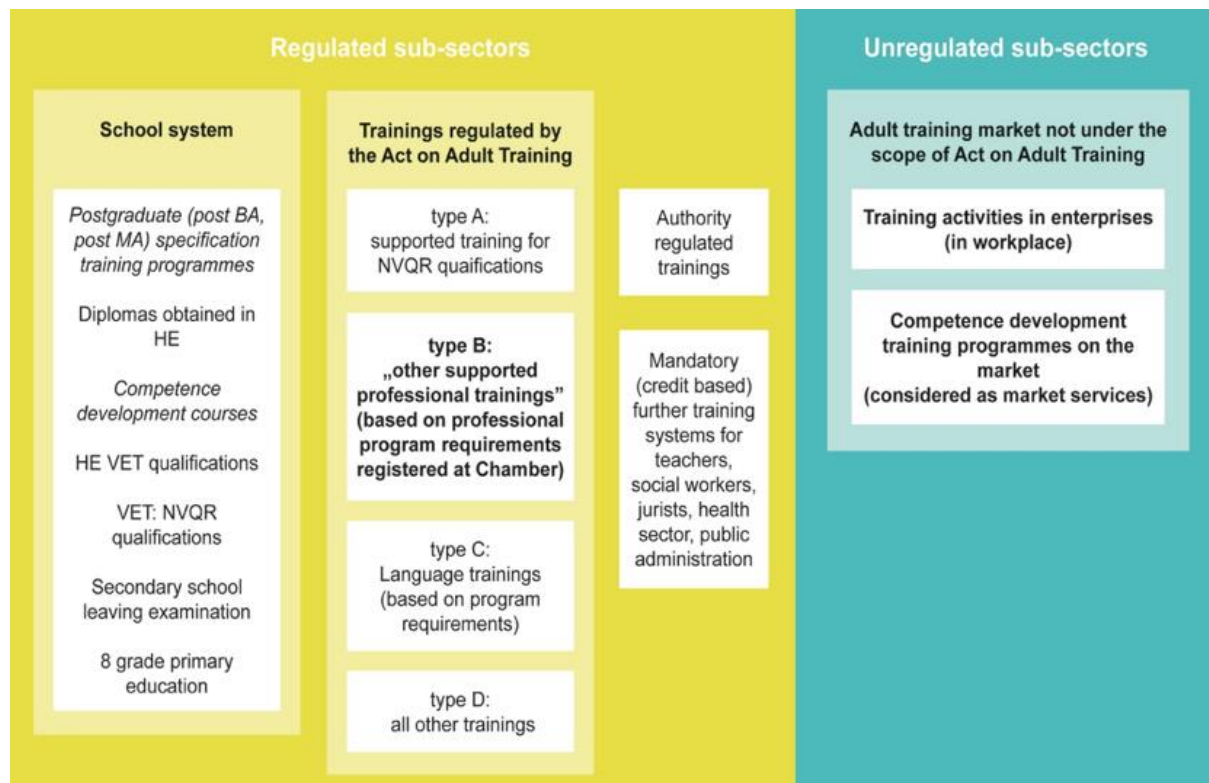
These programmes are categorised in four 'types' as illustrated in Figure 1:

Type A: state-recognised vocational training programmes which are standardised in the National Vocational Qualifications Register (NVQR) (OKJ in Hungarian) and are awarded the same qualification as similar programmes taught in the school system. Their authorisation is always compulsory.

Type B: 'other supported professional training'. If supported, these programmes have to be submitted to the Chamber of Commerce and Industry for authorisation. In essence, this so-called 'B-circle' licensing process is the inclusion of non-formal training into the national qualifications framework.

Type C: language courses

Type D: so-called 'all other' supported training courses.

Figure 1. Education and training system's sub-sectors in Hungary

There are two types of training in the regulated sector, but not under the scope of the Adult Training Act. One is compulsory further training. In certain professions, such as civil servants, teachers, and healthcare workers, compulsory continuing training systems are in place, involving a narrow group of training providers. The other regulated form of training is the training regulated by authorities under the auspices of different sectoral Ministries. This is needed because in some regulated professions such as electricians, supplementary training and examinations are required. In this latter type, a small group of training providers also organise both training and examinations.

Any provision beyond the above-mentioned four types is considered to be ‘market-based adult training’. On the one hand, there are training courses offered in companies and organisations regarded as the *closed* training market. On the other hand, there are various trainings and competency development programmes available on the *free* training market, which are considered, like any other service, a market service.

Our interview process attempted to reveal the interests of actors in the non-regulated adult training sector in submitting their training programs into ‘Circle B’. Some questions further inquired into the factors influencing such efforts.

4. Characteristics of training programmes and the status of 'papers'

The category of activities of training providers determines the status of the documents or 'papers' issued at the end of training and if they are state-recognised qualification/ certification or not. The legal status of 'papers', however, has nothing to do with the labour market value of the acquired knowledge and competences. A state-recognised professional qualification does not necessarily give more opportunities to employees than a short course on the training market. This means that at present the demand for training is not significantly affected by the status of the documents issued.

Whether a training provider enters into a legally regulated system of adult training depends on whether it needs that integration or is successful enough without being part of the system. It is also an important factor if the training can be integrated into the licensed training circles without damaging the provider's market interests.

An example of different interests is a one-man training micro-enterprise working with six or seven contracted trainers. Its activity is based on the entrepreneur's many decades of professional experience in international trade. Therefore, sketchy training programmes are appropriate, with many case studies based on the proprietor's own development and which are kept as industrial secrets. He is not interested in becoming a registered adult training provider. Customers are reached through his personal network. He does not even operate a website. *"All our training is tailored to the specific customer, and our strength is that we do not copy any American or other materials, but our training is rooted in the Hungarian reality."*

At the same time, other companies work with licensed programmes or those received from foreign companies and offer training courses tailored to the Hungarian conditions such as the local legal environment. There is a strong demand for these programmes. A unique type of non-formal qualification is when a certificate of a particular training company becomes a widely accepted brand. For example, REFA Group, which is Germany's leading company for work organisation and corporate development. It provides widely recognised certification through its partners in other countries.

For example, we got the following analysis from a twenty-five year-old company specialising in the organisation of conferences and which is a spin-off from the parent company with 70 corporate clients, 12 permanent staff members and 100 contracted trainers. *'... when the training market was not as open as it is now, we offered licensed training for our customers. We offered international training, but today this is not so relevant, because there are foreign companies which organise their own training here. But we have kept this main line of work. We are expensive, but we do our best to give quality. A*

lot of our training is a licensed programme from Germany, England or America. Obviously, these trainings will not be included in the national qualifications framework.

In the training market, it is especially important to meet customers' needs. The current procedure for acquisition of the so-called B circle authorisation involves obtaining a Chamber licence and, accordingly, inclusion to the qualifications framework. But it is a cumbersome and expensive procedure from the point of view of training providers. In addition – and this was most often emphasised in our interviews – it does not allow an existing programme to be tailored to the customer's specific needs and circumstances. According to the rules, the programme should be 'delivered' as was submitted. If it is modified it has to be submitted as a new programme again.

At the same time, programmes submitted for licensing will not always be subject to favourable judgement, and could possibly be rejected if the programme name has a high degree of similarity with an existing registered programme. The regulation also prescribes that the professional programme requirements submitted should not overlap with the state-recognised professional qualifications in the national register where a maximum of 30% can be the same. Later, this regulation was significantly softened, according to a 2016 regulation, the overlap threshold was 75%.

The biggest discontent among interviewees concerns the treatment of non-formal training providers' ownership of the programmes they submit. An innovative training programme is an advantage in the market. However, programmes submitted for authorisation with detailed learning outcomes published on the Chamber's website upon acceptance will become programmes that can be used by everyone. So, the training providers which developed the programme in the first place lose ownership of their own programme.

The above circumstances play a role in the fact that, to date, only a few non-formal training providers have initiated the inclusion of their programs into 'Type B' in Figure 1.

5. Training - where 'paper plays no part'

There is a slice of non-formal training, namely 'a competence development training programmes', which differ in character from the standardised, traditionally organised, structured programme. This group of trainings is also important, because it indicates that besides traditional training activities, a highly significant service offering added value has also appeared on the training market, differing from the learning outcomes, the standard requirements for teaching methods, as well as the target learners.

Within the same large enterprise training practice there are usually traditional training courses and trainings tailored to individual learners.

Trainers, coaches, organisational developers and advisers work primarily at the top management level. Their task is to develop competences that are highly appreciated by the market, enhancing the efficiency of a particular company. Their activities are tailor-made for individuals and client companies, that is, each programme's content is different. Serving the company's goals and needs requires a great deal of flexibility and continuous expansion of the methodological repertoire and the follow-up of world trends. *'Counselling is a business of trust, because one is completely stripped off in a coaching process, or even in an organisational development process.'* said a head of a consulting company. The company does not seek to document their programmes, processes and results. *'If you stole our server, there would be no big loss: Knowledge is in our heads.'*

6. Training of trainers?

The question arises regarding where well-qualified trainers learn from, how they develop their own competences and professional knowledge, and receive a certificate. In these cases, however, there is no standardisation: the solution is always unique. For several market leading companies the interviews showed different learning solutions. For example, they regularly organise internal conferences, presentations, thematic discussions, inviting foreign specialists or targeting foreign study tours, with many forms of self-education and group knowledge transfer. It is self-evident that the high level of knowledge and competence acquired in this way will not be captured in official documents. At most it appears within the professional CV of those concerned. Such 'qualifications' cannot be formalised beforehand: therefore they exist outside the scope of the national framework.

In general, there was a strong presence in the interviews of a certain degree of verbal devaluation of 'papers'. High professional quality was linked to working experience, individual skills, and a wide range of learning opportunities such as workshops, conferences, readings, foreign experiences, as well as organised training. The leader of one of the renowned fitness companies said: *'What makes a teacher so brilliant? Does he have a degree? He has some degree of education, but certainly not that.'*

7. Corporate internal training

Activities under the heading 'corporate internal training' differ from the other sub-sectors of adult training in several respects. In adult training, the individual decides whether to learn and which training company he wants to choose. However, internal training at a workplace is a closed system reserved

for employees of the company. The other important difference is that the purpose and the content of the training – even if there are many aspects to be considered and discussions take place – is basically defined by the managers of the given company. Generally the company finances the training. One of the long-standing features of the Hungarian system is that, unlike many Western European countries, workers' interest organisations do not play a significant role in shaping intra-corporate training to protect workers' training rights. Training is not generally part of the relatively rare collective agreements in Hungary. Usually employees can shape the relationship between their own learning path and the interests of the company in the form of individual bargains. Typically, such training does not provide any certification: the company is not interested in certifying its employees' newly acquired competences in a marketable way: it is enough if the company is aware of colleagues' assets.

8. The selection process and 'papers'

Recruitment of employees is a process in which the applicants' qualifications or certificates may play a role. However, 'papers', including state-recognised qualifications, play a secondary role. No 'paper' has such a level of trust that it would substitute for the actual competence tests carried out by the employer. *'The certificate itself does not authenticate, as there are basic skills and differences in abilities between those arriving with the same paper. With the same paper one can be almost a genius or almost illiterate.'* - said the head of a rural enterprise.

Employers prefer particular training company they know well, or favour a short market-based course either as a state-recognised, mostly longer-term training programme. They base their decisions on their awareness and popularity of a particular training company or the general good reputation of a given programme. At the same time, they have little information about the content of a qualification. Most employers rely on their own judgement and the assessment methods they use as being more reliable than any qualifying document. During the recruitment process, they look at the 'papers' but in choosing the person they need, they are curious about the actual professional knowledge and personal qualities not covered by certificates.

9. Specific sub-sectors selected for case study

We defined three thematic foci at the beginning of the research work in order to identify the specificities of some sectors. The sectors we selected for case study were: IT, sport and fitness, and alternative medicine.

Firstly, the IT sector was chosen because of its growing economic role, its fast-paced changes, the international market embeddedness of its activities, the diversity of learning methods used, as well as the variety of competency certificates available. In addition, with the help of the Association of IT Enterprises, we reached the key players in the industry for interviews especially in multinationals and in developing Hungarian companies specialising in software development. Both of these IT sectors use innovative, experimental training programmes.

Secondly, we selected the sports sector, specifically training providers in the fitness sector. Given the internationalisation of the sector, the variety of qualifications involved, the particular licensing system which is a condition for their operations, and the many emerging regulatory mechanisms, it seemed to be a field where many of the qualifications-related issues could be analysed.

Thirdly, we chose alternative medicine and natural medicine, where the acquisition of professional competencies involves mainly traditional pathways. At the same time it is a rather regulated, strict and closed system. Strictly controlled basic training and the opportunity to analyse the connection between highly specialised training courses justified the choice. In this case we could reach only three interviewees. Therefore, the resulting profile was too-fragmented to add meaningful data to this research article.

9.1 The IT Sector

There seem to be serious problems at the input side of IT training as few school leavers opt for this learning path even though there is a lack of qualified IT staff worldwide. One of the reasons for this could be the image of the IT profession which is far from the reality. Many believe that mathematical skills are essential for the IT profession.

Although higher education is an important recruitment base for IT companies, they do not always look for graduates: it is typical that second and third-year students are enticed into employment and given not only more thorough, but also more targeted, on-the-job training. This also shows that the documented qualification of graduates in the IT sector is less relevant.

Experts working on the development of qualifications frameworks often point out that it is important to use learning outcomes as the language for describing the requirements of training programmes because this is best understood by employers. However, the practice of companies operating in the IT sector shows another image. One of the training companies in the IT sector we interviewed does not use any learning outcomes list, but during the 18 months of training it continuously records what the

participants achieved, and what projects they participated in. Instead of formalised certification, an electronic record is maintained about the projects and tasks the person did during training. This e-portfolio approach reminds us of some of the features of the method used in pedagogical training. For the time being, this method of training is at an experimental stage. It is only a question of how to register such 'non-certificated certificates' issued to graduates, even when they are vast records. Certainly, such a 'certificate' or portfolio is not suitable for linking to the levels of the framework.

9.2 The fitness sector

Sport has recently become an extensive industry and professional sport has been transformed into a huge show-business through the media and its advertising revenue. Sport activities organised within clubs, activities called amateur sports, and recreational sports activities are separated with regard to qualifications, even though there are contact points between them. For example, in preparing professional athletes, methods and tools developed in recreational activities are also used. A small group of coaches can be active in both sectors, or professionals can move between these areas. Due to the fragmentation of the sector, it seemed reasonable to select a narrower area for empirical testing. So the interviews concentrated only on the training of fitness coaches.

Based on oral information, thirty training providers deal with the training of fitness instructors and coaches in Hungary. To illustrate the proportions: in the UK there are nearly four-hundred training institutions, more than 1,500 across Europe. The interviewees were mainly from the circle of trainers, especially managers or senior staff of training companies.

Fitness instructors generally have basic training and then further training to work independently on the fitness market. For them, the market position, knowledge, acceptance and quality of training, as well as the training price, are important. This is also a profession in which many stakeholders need to fund their own training. Compulsory training is specified with six credits per year required. For example, this can be accomplished by participating in three workshops. The Hungarian fitness market is modest but is expanding. Hundreds of certified workers are trained annually and are free to start their own business. The owners and operators of the fitness studios are also employers of trained coaches.

In the non-formal training market there are also programmes that are 'legally owned' international training programmes, which are not covered by domestic legislation and are advertised or taught by trainers trained in short-term training. Various professional bodies, lobby groups and influential people

are also agents involved in regulating the fitness sector. Another element that has a negative impact on the training profile is the fact that members of the examination committees are interested in achieving the highest possible pass rates and least possible failures. Anyone breaking this rule spoils the company's prestige, and might not be invited as a committee member again with consequent loss of income.

The market value of each fitness qualification can be measured by the kinds of jobs it opens within the domestic and international fitness industry. Those attending such trainings also consider this before they spend several months of their salaries achieving the necessary papers. Within the fitness sector, the accreditation of a training company seems to be the guarantee of quality in the international labour market, that is, not the document itself, but a specific accreditation organisation such as [Europe Active](#) in the fitness sector.

Some professional organisations try to provide an intermediary function within the sector in the labour market. As the qualifications framework can provide qualifications level information to the employer about the learning outcomes probably obtained by the employee, the Register of Specialists with a qualification is a kind of guarantee for the owners of the fitness studio as employers know that the candidate has the appropriate basic qualification. The Register of Specialists is a kind of authentication, for example EREPS. Essentially, the fitness sector has created its own qualifications framework.

10. State regulation influencing the qualifications landscape

The Adult Training Act and several regulatory changes in recent years, together with increasing state intervention, are dramatically rearranging the qualifications market. Firstly, the strengthening state dominance in vocational training, by concentrating all state-financed trainings into state-owned training centres, forces a change of strategy among non-formal training providers. It is determinative where the training company establishes its business, whether it strives for mass training or tries to provide something unique in a specific professional segment. For example, trainers can raise the entry requirements for training, or select teachers from the best professionals in the given field, or may not necessarily reduce the number of training hours in all possible ways, i.e. may seek to provide quality as per their own professional value system.

There are some students who consider their formal learning only as a hobby: they also participate in other training courses, but they do not aim at becoming professionals. This sometimes arises as an

aspect of formulating entry requirements that can significantly limit participation, thus depriving training providers of significant revenue.

The so-called 'certification business' also works in the fitness sector. Sometimes it is difficult to navigate through the densities of organisations, and some of our interviewees also talked about the fact that many of the representative organisations themselves have business goals, either ensuring markets or revenue streams. As the leader of one of the renowned training companies said: *'Certification is a huge business, a bigger business will be to qualify than to produce quality.'*

11. Knowledge of the framework

Although the development of the Hungarian National Qualifications Framework is not completely finished and implementation has just started, developers assume that the inclusion of certificates issued in the non-formal training sector into the national qualifications frameworks will be beneficial.

With some exceptions, we asked interviewees whether they know the qualifications framework, either the European Qualifications Framework or the Hungarian National Qualifications Framework, whether they heard about it, whether they know the essence, what they would like to see in their field of application.

The vast majority of interviewees had not yet interfaced with either the EQF or the NQF in practice. Some of the polite replies indicated that they had heard of them, and in several cases it was apparent that they knew the names only at the newspaper level, but sometimes it was mixed with something else. In some cases, the interviewer briefly described the essence of the framework during the interview and the interviewee provided improvised responses to this quick information. Several interviewees admitted that on the basis of the short information received previously, he looked at the subject on the Internet before the interview.

In the fitness sector, one of the market leaders was of the opinion that the training market changes too fast, and the levelling in a framework is a very rigid system: therefore, they do not consider it practical.

In the fitness sector, we also met one trainer who knows the framework through his European professional relationships and uses EQF levels. He also sees that this solution is commonly used and has advantages in EU-wide fitness practices.

12. State regulation versus employer assessments

Among the factors determining the training market, state regulation is the strongest. In particular, vocational training is affected by the endeavor to strengthen the position of school-based training centres, the 'repatriation' of state-recognised vocational training courses to school-based training institutions. Previously an important part of these programmes had been financed by the state, but delivered in the non-formal sector. However, the scope of the Adult Training Act applies to only one segment of non-formal training. A significant part of the training market still operates in a non-regulated way.

Qualifications, certifications and other documents basically justify the acquisition of a particular group of competences in the regulated, standard examination system and in the case of non-formal training with evaluation as expected in a given institution. Since the examination system currently does not guarantee the acquisition of all, or a high level of competences promised in the qualification description, it does not sufficiently inform employers. Therefore, they have developed a variety of solutions to evaluate candidates' real preparedness. There is only little chance that employers will use the framework levels as information instead of using their own methods including work-trials, discussions, short internships etc. as these methods provide much more information than the level of qualifications. The qualification framework describes the qualification requirements and their levels, i.e. it gives information about the *aims* of the training programme, but the employer is interested in the individual's level of achievement and his/her current state of preparedness for the job, which, of course, cannot be only the result of training.

13. Learning outcomes and competences

Out interview data also provided valuable experience about the use of learning outcomes. We assumed that at least some of the training companies in the non-regulated sector describe their training programmes in the form of learning outcomes and that these descriptions are available. However, most of the companies interviewed work from thematic topics, i.e. thematic syllabi, and their descriptions use the concept of competence only partially. So the transformation of training into a culture that reflects a learning outcomes paradigm in Hungary reaches a limit in the non-regulated training sub-sector. Based on these findings, it is possible to define which companies, and for whatever reason, do not enter the regulated training sphere and do not build relationships in the international market. From this finding the conclusion can be drawn that the spread of the learning outcomes approach and culture are currently limited by the rigidity of legal regulations. This may also mean that

in some ways the adult training sector is divided to the regulated sector, where the use of learning outcomes is an expectation, and the non-regulated segment, where it is possible, but not expected to use this approach and its tools.

14. Transparency and business secrets

The integration of qualifications and the integration of non-formal certificates into the NQF system are intended to ensure the transparency of certificates available to learners. Training providers in the non-formal market work from a variety of raw materials. In the Hungarian context, the National Vocational Qualifications Register (NVQR) which is recognised by the state, is an important source of the description of non-formal training programmes, which also means that improving the quality of the NVQR training programmes and the definition of their content and their description, indirectly affects this segment of the training market. Trainers compile their programmes on the basis of experiences from foreign countries, study tours, or international standards, building on their professional experience, editing, modifying and not denying that they sometimes collide. For them, transparency is not a desirable goal.

In the case of non-formal training providers, if they have developed their valuable training on the market, or if they have been compiled from other programmes, they do not want to forward the descriptions to a public database, because this step eliminates their copyright. They fear that this would be a free opportunity for others, which can worsen their own chances on the training market, since anyone can use that programme without any compensation to them.

15. Benefits and disadvantages of listing

The linking of non-formal certificates into the national framework is based on the training programme having learning outcomes describing the elements corresponding to the descriptors of the Hungarian Qualifications Framework. Training companies may decide which of the sub-sectors of adult training in Figure 1 they want their programme to belong to. If they enter the regulated sector and become integrated into the NQF there are a number of advantages, including:

- i. There may be EU or state funding available
- ii. They may qualify for VAT exemption

- iii. Customers may consider the registration of the training programme as a guarantee of quality and a desirable 'trademark'.

On the other hand, one of the opposing arguments raised in our interviews by a leaders of a training company is that the market does not require registration in the framework, or, at the moment, knows little about the effect of registration. Certain clients require authorised status of the training, in other cases this is not relevant. They say, initially many applications for inclusion in the register were rejected, so the impact could not be calculated by them. At the same time, a representative from the Chamber said learning outcomes were described in an inappropriate way in these rejected programmes. According to trainers, there was a lot of administration required for authorisation and the related costs were prohibitive. Most of the time, they complained that when successfully submitting professional programme requirements to the so-called 'B circle' in Figure 1, upon approval by the Chamber of Commerce and Industry, the original developers loose ownership of their programme.

Conclusions

In general, we can draw the conclusion that if the threshold for inclusion in the national framework is too high, then it loses its role of creating transparency for the national training system as a whole. Therefore, there are two parts of the world of training and qualifications: one is regulated and classified, the other is the non-transparent sector. The experiences gained through the interviews and other previous analyses indicate that there are really valuable training programmes in the non-regulated sector, also from the labour market perspective.

The experiences of corporate interviews also confirm that training companies are not attracted sufficiently to enter a regulated adult training market and to undertake the administrative burdens involved. *'Much admin for nothing'* as one of them said. In many cases employers, in particular in the context of the current serious shortage of labour, prefer to meet the needs of skilled workers, in addition to the regulated adult training sector, using their own solutions. This implies that they are not interested in linking to the national qualifications framework either.

So, if one of the aims of the national qualifications framework is to make the variety of certificates and qualifications transparent, there are currently controversial elements of regulation more likely to keep non-formal training away from being integrated into regulated subsectors.

