

Can Formal Learning Certify All Learning Outcomes?

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Across geographies, there is a taken-for-granted understanding that diplomas and certificates obtained through *formal* learning methods are more valid than, and superior to, those obtained through *non-formal* and *informal* learning. Indeed, in most countries' practices, there is a difference in confidence between a qualification obtained in formal education and one obtained outside of formal education.

When a transaction occurs within the formal system using a qualification obtained outside the formal system, either a person's certificate is mostly not processed at all, or lengthy procedures are applied to grant a small exemption.

In other words, the image is mostly presented as if formal education does not need to document non-formal and informal learning. But just when we thought that this is the truth of the matter, a question arises: "Can formal learning certify all learning outcomes?"

Everything in formal education proceeds in a planned and structured way. Although there are different examples, in many applications, students prove that they have acquired the learning outcomes determined for them and received their diplomas. So, how can the learning outcomes that *cannot* be certified in this process, but gained in the process, be certified?

If there is an achievement that does not have a place in the formal system but can lead to a good profession for learners in the future, how should it be certified?

At this stage, validation emerges as a well-structured tool that will do our job. Let's first look at validation practices with the Turkish example and discuss whether formal learning can validate all learning outcomes and whether the Assessment of Prior Learning is specific to non-formal and non-formal learning only.

Prior Learning Practices in Türkiye

Before a discussion of prior learning practices, a summary description of the education system and the qualifications in Türkiye is provided here.

Education is a constitutional right and is offered by the state at public schools and higher education institutions (HEIs) free of charge. Additionally, it is possible to open private schools and HEIs at all levels and for all types of education. There are also conservatories affiliated with the higher education institutions at lower secondary and secondary education levels.

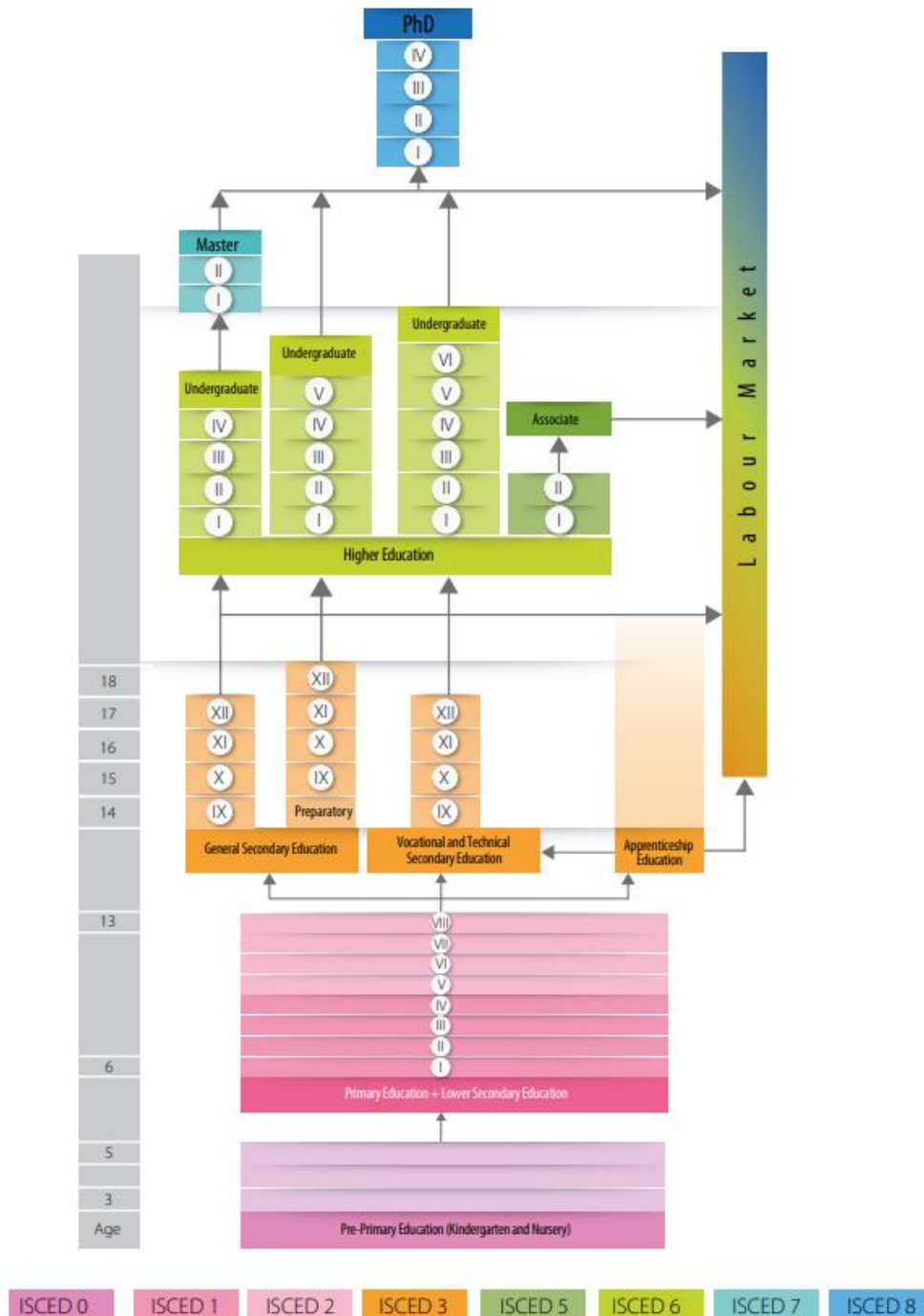
The education and training system in Türkiye is planned and operated by the Ministry of National Education (MoNE) and the Council of Higher Education (CoHE) in close

cooperation with all relevant public, private, and non-governmental stakeholders including learners and parents.

The basic principles of the Turkish national education system are laid out under the National Education Basic Law No. 1739. According to article 18 of this law, the Turkish national education system is formed with two main sections: formal education and non-formal education. Informal learning is also recognized in the education system through validation procedures. (Official Gazette, 1973)

Figure 1.

National Education System in Türkiye (Vocational Qualifications Authority, 2017)



There are some qualifications for which the Ministry of National Education (MoNE) is responsible. MoNE, carries out educational activities centrally from preschool to the end of secondary education. Education programs in primary and secondary education are developed by the Ministry of National Education and implemented on a national basis.

Compulsory education in Türkiye is 12 years. The first stage is primary education, the second stage is lower secondary education, and the third stage is secondary education. The formal education period generally refers to those between the ages of 6 and 18, excluding preschool.

The national authority responsible for higher education is the Council of Higher Education (CoHE). The basic regulation regarding higher education is the Higher Education Law No. 2457. Higher education is given in universities, high technology institutes, and vocational colleges established by foundations. Only universities and high technology institutes provide postgraduate education and can award diplomas at undergraduate, graduate, and Ph.D. levels. These two structures are for formal education.

The prior learning assessment side of the system is the third part of the Turkish System regulated by the Vocational Qualifications Authority (VQA). The qualifications awarded by prior learning assessment are given by VQA. The VQA was established in 2006 by the Vocational Qualifications Authority Law No. 5544 to establish and implement a national vocational qualifications system in line with the principles widely accepted at European Union (EU) level.

VQA can award many qualifications at every level of the Turkish Qualifications Framework (Vocational Qualifications Authority, 2022e) but most of them belong to levels 3,4,5. The topic of this article is mainly VQA's National Qualifications System and the education system in Türkiye. VQA is not a provider of education or training but regulates the preparation of national occupational standards (NOS) and national qualifications (NQs) by taking the labor market needs into consideration. VQA is responsible for awareness across the educational and business worlds, promoting LLL (languages, literature, and linguistics), and facilitating labor force mobility. After offering this initial description of the Turkish education and qualifications system, we turn to the details of prior learning assessment (validation) in Türkiye.

Historical Development and Legal Basis

While implementing systems for the validation of non-formal and informal learning is a priority in Türkiye, significant progress also has been made in developing the national qualifications system. With the establishment of the Vocational Qualifications Authority in 2006, Türkiye adopted a validation system. Vocational Qualifications Authority (VQA) manages this system, which is a powerful platform that brings together the public, workers, and employers. Although this system does not exactly claim to be a validation system, considering all the components of the system, it seems to work as a validation system in this way (Yazıcı, 2020).

The goal of the system is to certify the workforce with up-to-date knowledge and skills and to recognize they have gained all learning outcomes completely by validating prior learning. The Turkish Qualifications Framework (TQF) supports the validation of learning outcomes achieved in any learning environment (TQF, 2022). The TQF Regulation (2015)

acknowledges the value of the validation of prior learning, provides specific principles and procedures for the validation of prior learning and quality assurance, and calls for establishing integrative legislation in these areas (Vocational Qualifications Authority, 2022a)

Following the adoption of TQF in 2015, the framework was then referenced to the European Qualifications Framework (EQF) and the European Qualifications Framework for Higher Education (EQF-HE) in 2017. The EQF referencing criterion 3 is specifically related to arrangements for the validation of national qualifications frameworks for non-formal and informal learning. The Ministry of National Education's (MEB) 2014-2018 Lifelong Learning Strategy Document focuses on validation processes and encourages the widespread use of validation. In October 2017, a regulation on the recognition of prior learning on accreditation, evaluation, and validation principles and practice was published by the Ministry of National Education (Ministry of National Education, 2018).

This Directive covers the procedures and principles related to the verification of the learning gains acquired by the individual through formal/non-formal education or informal learning, equivalence work and transactions, measurement, evaluation, and certification according to the provisions of the Vocational Education Law No. 3308.

According to this Directive, the learning outcomes acquired by the individual through formal/non-formal education or informal learning are only evaluated by accessing journeyman and mastership certificates. Recognition and equivalence of prior learning, national vocational standards, national qualifications, and the learning outcomes gained by the framework education programs of the relevant field/branch are provided by measurements and evaluations that are made.

With the validation infrastructure in place, the current agenda is to improve communication, cooperation, and coordination among all relevant stakeholders. The identification and documentation, which are among the validation stages in the European Commission's Recommendation on Validation of Non-formal and Informal Learning in 2012, also need to be further developed, as well as evaluation and certification steps of prior learning assessment. Prior Learning Assessment (PLA) for professional and vocational qualifications is done by the VQA. As of December 2022, there are a total of 273 Authorized Certification Bodies (ACB) (Vocational Qualifications Authority, 2022b).

On the higher education side, validation is still in its infancy. Validation was brought to the Turkish higher education system legally by amending Law No. 2547 in 2011 (article 44/b), but not much progress has been made over time. Opportunities for validation do not lead to full recognition of the knowledge and skills that people have. Validation studies on immigrants and refugees are carried out with VQA practices, and significant progress has been achieved.

Responsible Bodies

Every organization that is related to any profession can be involved in the validation process. Such an organization can be a governmental institution, ministry, university, association, foundation, professional association, etc. Organizations involved in the validation process develop national occupational standards and qualifications and support the management of the testing, assessment, and certification process. The

Vocational Qualifications Authority coordinates labor market validation activities between Ministries and stakeholder institutions from the social partners, employees, and employers.

Since it provides the basic infrastructure for the validation system, the preparation of NQS and NQs provides great support to the sustainability of the system. This support is increased by the work of the 27 sector committees that evaluate and draft national occupational standards, draft national qualifications for the approval of the VQA Board of Directors, and conduct the unscheduled audit activities that play a major role in monitoring whether the processes are carried out in accordance with the NQS and NQ.

The Regulation on the Establishment, Duties, and Working Procedures and Principles of VQA Sector Committees requires that sector committees consist of representatives from the Ministry of National Education, Ministry of Family, Labor and Social Services, Council of Higher Education, professional chambers, employers, unions, professional organizations, and VQA and other relevant ministries.

The Vocational Qualifications Authority provides organizational management services and regulates the national qualification system including validation. At the point of providing service to candidates, the needed service is provided through the Authorized Certification Bodies. Examination and certification processes are carried out based on the National Qualifications prepared through the Sector Committees.

In the Vocational Education Centers, the recognition and equivalence of Prior Learning are carried out in 27 fields and 142 branches, which are within the scope of the law (# 3308) and whose training is provided in the Vocational Education Centers. As a result of the evaluation based on documents and information, an individual takes the exam to get a journeyman or mastership certificate (Ministry of National Education, 2022).

Those who have practiced a profession in the past, but do not have a vocational training certificate for the relevant profession, apply to the nearest Vocational Training Center with the insurance statements of the profession in which they work and other required documents. According to the results of the evaluation made at the relevant center, they could have a certificate in a short time by taking the journeyman and mastership exams successfully.

These procedures are carried out using the Directive on the Procedures and Principles Regarding the Recognition of Prior Learning, Equivalence and Measurement and Evaluation Transactions published by the Ministry of National Education on 02.10.2017 (Ministry of National Education, 2017).

Although the validation of prior learning in Higher Education institutions is legislated, at this stage, it is carried out by the decisions of the individual university's senate. Universities also include institutional-level validation arrangements permitted by their respective senates. Universities have very limited validation practices, resulting in a credit exemption of around 10% of the total course load. There is not yet an example of a prior learning assessment in which an entire diploma is gained.

For example, at Sakarya University and Yildiz Technical University, prior learning has been accepted by each institution and is verified at bachelor's degree and associate degree levels. The validation application at Sakarya University is offered to those who

want to benefit in two different ways. In the first application option, the courses taken at any university can provide exemptions to the candidates on a course-based basis.

In the second application option, the right to apply for exemption exams is granted with the acquisition of some knowledge and skills acquired outside of school. Candidates who apply for the exemption exam and whose application is justified as a result of the exam and who are successful in the exam are entitled to exemption. The exemption is applied only for 5-6 courses where an exemption exam is given.

In summary, while the course taken at the university is directly exempted, the exemption exam covers the knowledge gained outside the university. Candidates whose applications are justified as a result of the exam are entitled to exemption. There are different types of courses in universities. One is theoretical, the other is practical-- courses that have laboratory sections. If you want to use prior learning assessment, your courses must be theoretical and they must not have laboratory practices or must not be a graduation project course. This application right is not given in the courses that will be evaluated by giving a practical course, laboratory course, or graduation homework (Sakarya University, 2018).

The practice of verifying previous learning at Yıldız Technical University, on the other hand, gives exemptions for the course or a maximum of 18 credits in total and does not provide the road to attain a full qualification (Yıldız Technical University, 2018).

Finance Arrangements

Financing arrangements include the government, the individual, and the organization/institution. Fees related to the validation process create a financial burden, resulting in a search for different funding systems. For this reason, various methods of funding are being developed and research is constantly carried out to find new methods.

Validation in Türkiye is carried out by the VQA specifically for professional qualifications. For this reason, the resources used for validation tend to be limited to the resources of the Vocational Qualifications Authority, whose financial structure is designed to have financial autonomy and cover the costs associated with the majority of validation resources. Sources of funds are as follows:

- membership fees of institutions from the private and third sectors,
- fees collected from applicants for examination and certification services,
- revenues from national and international service provision,
- annual dues and fees collected from institutions and organizations serving VQA regarding testing, assessment, evaluation, certification, and accreditation,
- fees for publications, copyrights, brand names, and licenses,
- fees paid by candidates for exams,
- other income, earnings, and donations.

In addition, exam and certification fees are covered by the EU Projects and Unemployment Fund and do not create additional income for the Vocational Qualifications Authority. In 2011, a change in the allocation of revenues was made, and since then most of the costs are covered by the state and offered to its citizens as a validation service. This increases the sustainability of validation financing.

The validation candidates who use the service mainly pay the cost of the validation process offered through authorized certification bodies. Organizations carrying out validation activities are not provided with additional funds for their other activities. Organizations only get assessment and testing fees from the candidates apart from the project resources. Therefore, the funding provided is not institutionally allocated for validation.

Moreover, the preparation of professional standards and qualifications in most cases is voluntary, based on protocols signed between relevant stakeholders and institutions. Within the scope of this volunteerism, stakeholder institutions and organizations allocate resources from their own budgets during the preparation of NQS and NQ.

In addition, VQA carries out its work with different committees in 27 sectors. What is inevitable is that there are different technical areas of expertise and working conditions in each sector, and it is not possible to employ experts who have full knowledge of this technical information within the VQA. For this reason, VQA has created a list of experts who are competent in their fields for these 27 sectors (Vocational Qualifications Authority, 2022d), naming it the “expert pool.” When there is a need for technical knowledge or workforce augmentation, this need is met by making use of the expert pool.

The main funding source for the validation process comes from the unemployment fund, which is utilized by those who wish to obtain a certification in one of the ministry-designated “dangerous occupations” like welding or medical waste collection. This reimbursement is only available once for each successful candidate.

The fees paid by the candidate are returned if the candidate is successful at the end of the process and progress is made. Until the end of 2021, financial support was mostly provided from the unemployment fund with more than 1.6 million candidates receiving support.

In addition, the validation process is supported by EU funds. With the EU projects carried out, 32,000 candidates were able to become a part of the labor market as certified employees with validation.

For validation done under MoNE's authority, one pays only for the materials used and not for the examination process. Assessors and other expenses are covered by the general budget.

Prior Learning Assessment Practitioners

As the validation arrangements of MoNE and VQA focus on the evaluation of learning outcomes, professionals play an important role in the evaluation process. The 273 ACBs (Authorized Certification Bodies) work with professionals when they take primary responsibility in the prior learning assessment and evaluation processes of individuals seeking national qualifications. These professionals are quality management representatives, evaluators, decision-makers, internal validators, and certification managers. There are also various committees for appeals and complaints, objectivity, and programs. VQA monitors the activities of all these professionals and provides support through face-to-face contact, email, and the VQA web portal. The technical

criteria and evaluator profiles are defined in detail in the National Qualification documents (Cedefop, 2019).

Assessors for technical fields are mostly teachers and engineers in vocational training schools. Assistance and support are sought from experienced professionals (such as a hotel manager experienced in the tourism field) as evaluators for other fields. There may also be persons working in the education and labor market sectors providing guidance and counseling.

The evaluators in the vocational education centers under the duty of the MoNE are VET teachers who make evaluations in their own fields and who have not received validation training before. The MoNE Lifelong Learning 1 and Lifelong Learning 2 projects in 2013-2017 stated that making progress on the prior learning assessment process and the profiles of the practitioners as outputs would be important.

Quality Assurance

The provision of quality assurance processes in Türkiye is the responsibility of the institution responsible for the prior learning assessment process, especially considering the validation practice. For VQA qualifications where validation is effective, the main quality assurance milestone is to carry out the process in accordance with the National Occupational Standards and National Qualification documents. In addition, the regulations, guidelines, and guides prepared by VQA also support the understanding and knowledge of the quality criteria of the stakeholders and individuals involved in the process.

In addition to all these, the Regulation on Quality Assurance of Qualifications to be Included in the Turkish Qualifications Framework (Official Gazette, 2015) published in the Official Gazette No. 30371, provides an integrated quality assurance approach regardless of whether the qualifications in the entire education and qualification system are obtained through formal, non-formal, or informal learning.

The practices related to ensuring quality are determined by each responsible institution in coordination with VQA using the quality assurance principles and procedures stipulated by the regulation. TQF Council and TQF Coordination Council ensure the sustainability of the system by monitoring the continuous improvement of all quality processes.

Relevant European Union recommendations and practices have been considered in improving the quality assurance principles and criteria. These are the European Association for Quality Assurance in Higher Education (ENQA), the European Qualifications Framework (EQF), the European Quality Assurance in Vocational Education and Training (EQAVET), the European Quality Assurance Reference Framework for Vocational Education and Training (EQARF), and the European Credit System for Vocational Education, including components such as ECVET (Quality Council for Trades & Occupations, 2016).

VQA has a quality-assured audit process for ACBs. Specific quality criteria to authorize VQA quality assurance system certification bodies are based on ISO EN 17024 Accreditation and VQA Quality Assurance Criteria. Audits can be organized as planned or unplanned, and possible practices that are unethical and not consistent with legislation

can be revealed. If ACBs provide vocational training, they should separate their training activities from assessment and evaluation systems. All kinds of measurement and evaluation activities are recorded and stored on video. With all these applications, malfunctions in the system are detected.

Counseling and Guidance

To introduce the Vocational Qualification System and to explain that people working in dangerous professions must have VQA Vocational Qualification Certificates, information events are held in different cities to reach employers and employees who do not have an official qualification.

VQA has established a help desk to inform citizens and provide technical support to ACBs. Some services of VQA are also provided through an online tool named e-Devlet (e-Government). In addition, public service broadcasts were broadcast on television channels in the past. However, these publications are not generally related to the basic understanding of validation, but rather to explain occupational safety and health and incentives provided by the government.

To be authorized as ACB, candidate institutions join seminars that are held at least once a month. ACBs carry out various awareness-raising activities under their own responsibility to promote the prior learning assessment system.

Since the first two stages of the validation process (identification and documentation) are not fully implemented in Türkiye, information, consultancy, and guidance services focus on validation opportunities, the benefits of validation, and the results of the evaluation. In addition, since the assessment and evaluation processes are carried out by ACBs, more consultancy and guidance are offered to ACBs.

Counseling and guidance, mostly as information activities, can be obtained free of charge to the validation candidates for VQA's qualifications through the VQA web portal, e-Government applications, ALO 170 hotline, the help desk created in VQA, and face-to-face briefings by ACBs. In addition, counseling and guidance are provided to employers and validation practitioners through training and other activities before, during, and after prior learning assessment.

Although the candidates applying through the Turkish Employment Agency (İŞKUR) are theoretically informed about VQA Vocational Qualification Certificates, in practice, the fact that validation practices do not cover formal education, and job and vocational counselors do not have detailed information about validation, candidates receive limited counseling from these institutions.

National Qualification Framework Connection

Qualifications provided through validation are an essential part of the national qualification system. Formal qualification is awarded at the end of a validation procedure. VQA qualifications have a unit-based structure; candidates can take and accumulate unit qualifications separately. The Ministry of National Education (MEB) can arrange these unit qualifications within the full qualifications it offers through education and training and with partial or even very small validation applications.

The national qualifications framework, on the other hand, becomes the central regulation tool of national qualification systems because it brings together all these qualifications, defines them with learning outcomes, and provides transition opportunities by comparing them with each other. In this way, the validation system forms an inseparable whole with the qualification framework.

Quality assurance processes are carried out to ensure all qualifications given through validation are included in the national qualification framework. TQF always uses the NQF in its own processes, which is based entirely on the principles and objectives of learning outcomes and supports validation in its broadest sense.

To improve the link between education and employment and align vocational education programs with national occupational standards, all education and training programs and curricula are (re)designed according to learning outcomes compatible with national standards and qualifications, and to be included in TQF. This is also seen as a supportive situation in terms of validation in education and training programs (Cedefop, 2010).

How to Obtain VQA Vocational Qualification Certificate

For individuals to obtain VQA Vocational Qualification Certificate, they must obtain a national qualification for the profession they want to obtain a certificate from and select a certification body authorized by VQA to conduct the exams and certification for the national qualification.

Candidates learn about the certification bodies authorized in national qualifications for which they want to obtain certification by making inquiries from the authorized certification bodies search module on the VQA website.

The entire examination and certification process is carried out by authorized certification bodies. Individuals submit their exam applications to certification bodies authorized in national qualifications for which they want to obtain certification.

VQA Vocational Qualification Certificate and a portable wallet-type VQA Vocational Qualification Identity Card are issued to the candidates who are successful in the theoretical and performance-based exams conducted according to national qualifications (Vocational Qualifications Authority, 2022c).

Evaluations And Conclusion

If we look at the entire system holistically, national qualifications are created for the knowledge, skills, and competencies for the profession outside of formal education, and certificates are issued to the candidates who are successful in accordance with these national qualifications within the national vocational qualifications system.

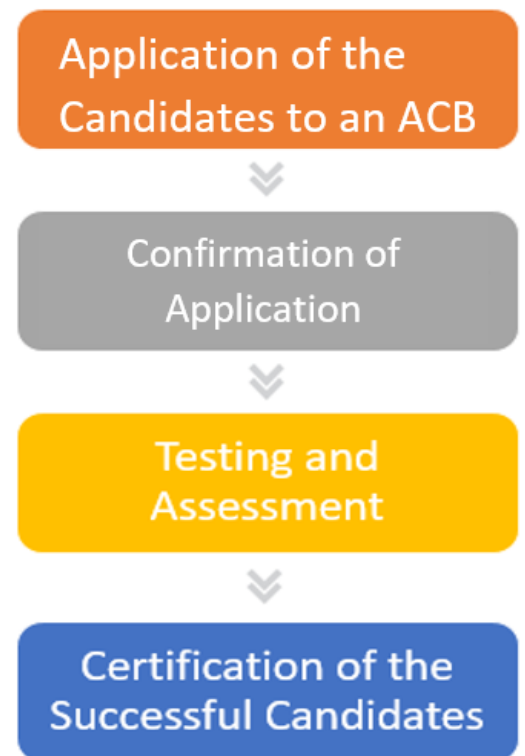
It is indeed an opportunity for people who do not have a profession but want to certify their knowledge, skills, and competencies, thus making a career or changing their profession and building a new future. In this way, the quality of the country's current workforce is increased, and new doors can be opened to people who are unemployed and looking for new job opportunities.

Under normal circumstances, when one reaches a certain position in a profession, that profession and career can be very difficult to change, especially in low-level professions. However, prior learning assessment makes proving competencies in different fields possible without spending a lot of time, thus opening up new employment opportunities by obtaining documents required by the new field.

However, in Türkiye, PLA is seen as a tool for assessing learning acquired from sources other than formal education, which is mostly carried out through non-formal and informal learning experiences. Although there are examples at the graduate level in some countries, this type of assessment (PLA) is typically used mostly for qualifications other than formal education at 3-4-5 qualification levels. This leads to the conclusion that this method can only be used for the knowledge, skills, and competencies acquired in non-formal and informal learning environments at this level. The question to be asked is, "Do people acquire uncertified knowledge, skills, and competencies *only* in the non-formal and informal learning environment?"

Even experts who are involved in the field of validation in the first place can say yes to this question. But when we think about the question, we can realize that we were wrong. Only the skills gained in non-formal and free learning environments remain without certification. However, we should remember that whatever the place, whatever the source, they go through a learning process. Considering this, we must also remember that only the learning outcomes that should be granted to learners are measured and evaluated in formal education processes.

Still, doesn't this happen in the formal education processes in the acquisitions that are *not* in the formal education plan, that is, those without measurement and evaluation? When we ask ourselves these questions, we need to consider that there may be undocumented gains in formal education processes and that the evaluation of previous learning can be used even for those individuals in formal education processes.



A High School Student

Let's consider a high school student. In a normal situation, there is a predetermined curriculum for a high school student, that is, a group of courses and the learning outcomes that these courses should bring to the student. Let's assume that there is a computer lesson in these achievements. Let's assume that the pre-determined acquisitions for this course are the acquisitions such as turning the computer on and off, using the internet browser, using MS office programs, and knowing the details of the operating system.

Since these are the achievements pre-determined for this course, measurement and evaluation activities related to the course will also ensure that these gains are measured. If the student demonstrates that he/she has acquired these stated gains, he/she will pass the course. But when students take their computer skills further across this course, how will those students be able to document them when they learn programming and gain expertise in computer hardware based on their own efforts? However, even if this learning is carried out in the formal learning process, it will be comparable to an undocumented competence. Where and how will this achievement be certified?

A University Student

Let's consider a university student from a different perspective. Although there are different applications for university students, the undergraduate program in which it is included has certain courses. Although learning is enriched with different elective courses, the learning outcomes that will be acquired throughout this educational life are predetermined and are shaped according to the courses chosen.

What will the situation be like when he/she gains knowledge, skills, and competencies other than the achievements of these pre-determined courses?

Imagine that this student is a member of a college student body. Let's imagine that during these community activities, he/she organized events, communicated with competent speakers, arranged a hall for the events he/she organized, and made the announcements of the event. Doesn't this student gain competencies in human relations, organizational skills, time management, and leadership? So, in what way will the student who has achieved these gains be able to document these knowledge, skills, and competencies when he wants to gain them?

The answer to these questions will of course be documented by the method of evaluation of prior learning. The point that should not be mistaken here is that the validation of prior learning is not a tool to be offered only for learning carried out outside of formal education. Wherever learning takes place, some learning cannot be documented even in formal learning experiences.

The misconception that assessment of prior learning is for low-level skills or only for types of learning other than formal learning should be avoided. Prior learning takes place in *every* environment where people are learning, from every source, and in every platform. *All* learning should be certified by the assessment of prior learning. In addition, the documents prepared in this way should be at least as valid and reliable as those given in formal education.

Acronyms

ACB	Authorized Certification Body
CEDEFOP	European Centre for the Development of Vocational Training
CoHE	Council of Higher Education
EHEA	European Higher Education Area
EQF	European Qualifications Framework for Lifelong Learning
EU	European Union
HEI	Higher Education Institution
ISCED	International Standard Classification of Education
MoNE	Ministry of National Education
NOS	National Occupational Standard
NQ	National Qualification
NQF	National Qualifications Framework
NVQS	National Vocational Qualifications System
TQF	Turkish Qualifications Framework
TQF Regulation	Regulation on the Principles and Procedures for the Implementation of Turkish Qualifications Framework
VET	Vocational Education and Training
VQA	Vocational Qualifications Authority

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