MONITORING VET RECOMMENDATION AND OSNABRÜCK DECLARATION

Serbia 2023
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Introduction

The first integrated monitoring exercise on the EU Council Recommendation on VET for sustainable competitiveness, social fairness and resilience (2020) and the Osnabrück Declaration on VET as an enabler of recovery and just transitions to digital and green economies (2020) was carried out in 2023. It was guided by an integrated framework connecting priorities of both policy documents and it focused on five EU priorities: agile and resilient VET, adaptive to labour market needs; flexible VET and inclusive, providing progression and lifelong learning opportunities; innovative and excellent VET; attractive VET, based on modern and digitalised provision; VET underpinned by quality assurance.

The Serbia country brief includes a summary of the main policy developments across the EU priorities 1, 2 and 4 – as prioritised by the country, in 2021 and 2022. The EU priority associated with quality assurance is presented as cross-cutting and is not covered separately. With the objective of aligning its reporting and monitoring activities with the EU member states, at the beginning of 2022, Serbia took part in this process to facilitate recovery and just transition to a digital and green economy.

Serbia’s key strategic documents are in line with the country’s ambition with regard to EU accession, which is reflected in the latest Strategy for the Development of Education by 2030 (2030 Education Strategy), encompassing the vocational education and training reforms. In the reporting period 2021-2022 for this integrated monitoring exercise, the Government remained committed to and made progress in a number of areas, including further developing digital skills, advancing structures in support of lifelong learning, and the alignment of qualifications with labour market needs; improving school-to-work transition through work-based learning; improving skills information and establishing the structures for piloting the Youth Guarantee. The above remain high on the agenda of the Serbian Government, which is reflected in its Economic Reform Programme for the period 2022-2024, as well as 2023-2025. The most recent of the guiding documents is the Action Plan 2024-2026 on the implementation of the 2030 Education Strategy.

Most of the observed reform measures fall under the mandate of the Ministry of Education and are often implemented in cooperation with other public institutions and agencies, as well as with other stakeholders. In the observed period, the overall political situation remained largely unchanged. After the general elections took place in April 2022, the government operated in ‘technical’ capacity for several months, causing a slowdown in the implementation of the country’s various activities.

The aim of the country brief is to inform ETF with regard to integrated monitoring and analysis of the implementation of the EU Council Recommendation on VET and the Osnabrück Declaration, relevant EU monitoring and reporting (e.g. European Commission Education and Training Monitor and the European Semester) and to be a regular source of information on recent VET-related policy developments. This brief captures policy developments in the Republic of Serbia in the initial years of implementation with regard to the EU and thematic priorities identified in the country’s national implementation plan.

The brief was prepared by Ivana Aleksić in cooperation with the key VET stakeholders in the country. More information about the country’s policy developments (PDs) covered by this report can be found in the PD fiches published on ETF OpenSpace.

An elaborate description of the national VET context, challenges and national VET priorities for Serbia is available in the 2022 Country Brief - Serbia, authored by Jasminka Marković-Čekić.

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1 Those selected by each country in their NIP.
Main policy developments in 2021 and 2022

EU priority 1: Agile and resilient VET, adaptive to labour market needs

Serbia has made progress in the EU priority area 1 focusing on the relevance and responsiveness of the VET system in the country (for more details, see the policy development fiches 1 through 3 on ETF OpenSpace):

1. Continuous development of new and refreshment of the existing qualification standards through VET stakeholder engagement

(Thematic priority ‘Modernising VET standards, curricula, programmes and training courses’)

Serbia is committed to and has been continuously working on the harmonisation of the education system outcomes with the labour market needs through the implementation of different measures, most notably, the development of the new and an update of the existing qualification standards (QSs) as well as the development of the accompanying VET educational profiles/curricula based on QSs. This commitment is clearly laid out in the country’s education strategy – SED 2030 and in each iteration of the Economic Reform Programme (ERP) since 2021, where further development of qualifications is recognized as one of the country’s priorities. Innovation of QSs was intensified after the adoption of the 2017 Law on Dual Education and the 2018 Law on National Qualification Framework Serbia (NQFS)\(^2\). The enrolment of students in educational profiles based on the qualification standards is constantly growing (87% in the 2021/22 school year) with a projection that all students entering school year 2023/24 will be taught within the VET secondary curricula based on the modernised QSs.

The Registry of Qualifications as a sub-registry of the NQFS Registry, run by the Agency for Qualifications, is made publicly accessible through a digital portal that became operational in 2021; and a list of qualifications has been regularly updated on an annual basis since it was revised in December 2020 – for the first time since the 1990s\(^3\).

Activities directly related to the QSs’ development include the efforts to ensure full participation of the sector skills councils (SSC) in the preparation of QSs as well as the strengthening of the Agency of Qualifications (AQ) and the Council for NQFS, the main actors in this process. As a result, during 2021, as a part of the continuous process of development and modernisation of QSs, a total of 38 qualification standards (QSs) was developed across nine industry/economic sectors in collaboration with the Sector Skills Councils (SSCs) and the Council for NQFS, with an additional 20 new/revised QSs across six sectors during the year 2022.

The AQ was also working on the interoperability of the NQFS Registry with other public administration databases – with the one run by the National Employment Services as well as with the Central Registry of the Compulsory Social Insurance. In 2021, as a part of the development of the Methodology for Sector Profiles, the ministry in charge of education, with technical assistance from the E2E project, prepared a tool for the alignment of qualifications with occupations in line with the NQFS, to serve as a basis for digitalisation of data on sectoral occupations and qualifications. In 2022, the Agency for Qualifications initiated activities on the alignment of the NQFS with the EUROPASS online platform, including the translation of the general descriptions of qualifications in pre-university and university education to English.

\(^2\) NOKS website: https://noks.azk.gov.rs

\(^3\) The latest update was published in April 2023 at https://azk.gov.rs/projekti/ListakvalifikacijaRepublikeSrbije-01-04-2023.pdf.
2. **Continuous development and revision of the VET curricula, teacher training provision, preparations of teaching and training materials**

(Thematic priority ‘Modernising VET standards, curricula, programmes and training courses’)

The work carried out in the course of the development and modernisation of the QSs is followed by the process of continuous development and revisions of the VET curricula associated with different VET profiles. During the years 2021 and 2022, the Centre for Vocational and Adult Education Training of the Institute for Improvement of Education (IIE) continued to prepare a new and/or a revised version of the VET curricula that is relevant for the VET profiles affected by the QSs change. This process triggers a number of other steps to follow, including the provision of training for teachers teaching revised VET curricula, preparations of the teacher training materials as well as the preparation of teaching materials in support of VET curricula delivery in secondary VET schools.

The IIE’s approach to curricula design – including new VET curricula – consists of integration of the transversal/soft skills and competences into the new/revised curricula, in line with the European approach to Competences for LLL and as stipulated by the Framework Law on Education of the RS (thematic priority ‘Acquiring key competences’).

As part of this work – as reported by the Centre/IIE staff since the early 1990s, the IIE also ensures that digital and green skills are represented in the curricula across 14 study areas and in different VET profiles. The IIE staff reported that the stronger the link of a study area is to the environmental/green challenges (for instance, agriculture, energy and similar), the stronger the emphasis is placed on the acquisition of ‘green’ skills. Although RS did not prioritise ‘Integrating digital skills and competences in VET curricula and programmes’ and ‘Integrating green skills and sustainability in VET curricula and programmes’ in its NIP, due to the legislative requirements laid out in the Framework Law on Education of the RS, such thematic priorities constitute an integral part of the presentation of the VET curricula development and the associated activities (training provision, training and teaching materials). At this time, the coverage of key, digital and green skills within any VET curricula is not tracked to allow for a more detailed assessment.

The IIE and, more specifically, its Centre for Vocational and Adult Education, is one of the key interlocutors in the communication of the reform changes introduced through the VET reform since it represents the first point of contact for secondary VET teachers. The Centre is available to every VET teacher through the Viber group through which it alerts VET teachers and school leaders about the system novelties and is available to respond to teachers’ questions and dilemmas.

3. **Dual education reform at the level of secondary VET education**

(Thematic priority ‘Reinforcing work-based learning, including apprenticeships’)

The work on dual education reform at the level of secondary education was further facilitated by the adoption of the Methodology for Development of Curricula for Dual Education Profiles developed by the IIE in 2021. As a part of the same initiative – in order to support the employers’ engagement with dual VET education – the Serbian Chamber of Commerce and Industry continued to train instructors for practical training, in line with the arrangements for work-based learning within companies. During 2021, its Centre for education and dual education trained 495 instructors for dual education and a further 292 instructors in 2022, according to the Annual reports of the MoE on the implementation of the Annual Plans for Adult Education in 2021 and 2022.

To reiterate its commitment to the dual education reform, in November 2022, the Government of the Republic of Serbia made an institutional change by forming a special Office for Dual Education and NQFS attached to its Cabinet. Among other tasks, the Office will be in charge of managing large-scale externally funded projects, including those focused on the development of VET and dual education infrastructure (training centres). Coordination of the work of all international partners in the sector related to the dual education, NQFS and LLL will also be carried out through the new Office.

Serbia remains committed to establishing and developing skills intelligence systems, including graduate tracking, and this area will require more attention in the upcoming period.
EU priority 2: Flexible VET and inclusive, providing progression and lifelong learning opportunities

Serbia has made progress in meeting the objectives within the EU priority area 2. On the one hand, it has made varying levels of progress in the areas indicated as priorities within the country’s NIP (for instance, slow progress on RPL) and, on the other, it has made significant progress in the areas that have not been formally prioritised (for instance, advancements in setting up the Youth Guarantee). Despite challenges with regard to implementation, Serbia’s practice of inclusive education has been fully institutionalised and is not a subject of separate reporting herein (thematic area 2.4).

The above developments are analysed in the policy development fiches 4 to 6, as follows (for more details, see the policy development fiches on ETF OpenSpace):

4. Expanding non-formal education/adult education opportunities

(Themes: ‘Learners’ possibilities of accumulation, validation and recognition of learning outcomes acquired non-formally and informally’; and ‘Developing and applying qualifications smaller/shorter than full’)

The 2017 Law on NQFS defines non-formal education as an organised process of learning by adults that takes place in line with special programmes aimed at the acquisition of knowledge, skills, competences and attitudes for the purpose of work, and personal and social development (Art. 2). It represents one of the pathways for acquiring vocational qualifications through different activities in the domain of adult education with the publicly recognised organisers of adult education activities (PROAEA) (Art. 9).

According to the ex-post analysis of the implementation of Serbia’s strategy for education until 2020, some of the main challenges for the relatively low level of participation rates in adult education include the limited offer and quality of training programmes, but also the format and accessibility of training programmes due to their high cost.

Based on an extensive analysis of the accreditation process for the PROAEA/JPOA, in 2021 the MoE adopted new legislation related to the standards for accreditation of non-formal adult education programmes. Based on the NQFS Law, in December 2021 the Rulebook on detailed conditions regarding programmes, personnel, space, equipment and teaching aid for the acquisition of the status of PROAEA/JPOA was adopted and entered into force in January 2022. The bylaw was supported by the ‘Guide for acquiring the status of PROAEA’, published by the Ministry of Education, aimed at facilitating the accreditation of those institutions and organisations that acquired PROAEA status.

The number of PROAEA/JPOA has increased. According to Ministry of Education data, between 2016 and 2021 the registered number of PROAEA was 108 with 433 programmes, whereas in 2022 the total was 139 organisations delivering a total of 570 programmes. The majority of programmes delivered by PROAEA are in the following areas: healthcare and social protection; geodesy and construction; foreign languages; safety and protection at work; and, mechanical engineering and metal processing.

To enhance the quality of the PROAEA, a new bylaw – The Rulebook on the standards of self-evaluation and external evaluation of the quality of work of the PROAEA – was adopted in February 2022. This Rulebook stipulates that the Agency for Qualifications carries out external evaluation of the PROAEA and defines three areas of quality assurance: (i) Managing the quality assurance system at the level of PROAEA, (ii) The programme and process of learning and achievements of candidates, and (iii) Support to candidates in their personal development and the development of their careers.

One of the obstacles in the process of PROAEA accreditation observed by secondary schools is the

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4 In practice of the Serbia’s inclusive education, children disadvantaged on the basis of disability, learning difficulties or (social and/or educational) disadvantage are routinely referred to the VET secondary schools while the schools are obliged to observe the use of the individual educational plans (IEPs) in support of students’ individual educational needs. Most of the VET secondary schools require students’ health certificates prior to enrolment, therefore not all disadvantaged children with disabilities can attend “regular” schools but rather “special education” schools.
high cost of the andragogical training for school staff licensing, as well as the length of the accreditation procedure.

5. Development of the system for recognition of prior learning (RPL)

(Thematic priority ‘Learners’ possibilities of accumulation, validation and recognition of learning outcomes acquired non-formally and informally’)

The Law on NQFS, its subsequent amendments, as well as the adoption of the 2020 Rulebook on standards and the modality of implementation of the procedure for recognition of prior learning (RPL), created conditions for the commencement of work on the RPL system in Serbia.

Although the establishment of the RPL system in the country has been a long-time objective, the progress in advancing the conditions for RPL has not been significant. Serbia’s NIP (November 2022) established that the implementation of the RPL system was only at its beginning. There is a need for greater promotion of the RPL system among the population. Also, only a limited number of PROAEA obtained a license to carry out the RPL, indicating the need for an expansion of this function among the existing PROAEA as well as the accreditation of new PROAEA with this capacity.

According to the 2021 and 2022 Annual Reports on the Annual Plan for Adult Education of the MoE, as a part of the IPA 2014-funded project ‘Development of an integrated national qualifications system in Serbia’, the envisioned RPL approach was piloted in 21 schools in 2021, whereas three VET schools received RPL accreditation (VET schools from Subotica, Vlasotince and Belgrade) for 10 different programmes in the sectors of construction, forestry and wood processing. A total of 27 candidates, employed with companies interested in supporting RPL for their staff, received public documents. In the case of these specific companies, the RPL public documents - formally recognising knowledge, skills and competences of their staff - were required for the companies’ acquisition of certificates of quality or for participation in tenders (MoE). During 2022, the RPL progress was even more modest with a total of 7 candidates receiving the RPL public documents in two VET schools only (Vlasotince and Subotica).

6. Creating conditions for establishing the Youth Guarantee

(Thematic priorities ‘Diversifying modes of learning: face-to-face, digital and/or blended learning; adaptable/flexible training formats; and ‘Learners' possibilities of accumulation, validation and recognition of learning outcomes acquired non-formally and informally’).

Serbia expressed its interest in setting up the Youth Guarantee (YG) as a format of active support for the youth, although this was not prioritised in the country’s NIP. The work on creating conditions for establishing the YG is led by the ministry in charge of labour and supported by the ministry in charge of youth, with the participation of a wide range of government and non-government stakeholders, including the Ministry of Education.

Youth unemployment rates in the country are quite high, while the participation rate of youth and adults in formal and non-formal education and training in Serbia is still low. Some of the main challenges include the limited offer and quality of training programmes, but also the format and accessibility of training programmes due to their high cost.

Early discussions on the introduction of the Youth Guarantee took place in 2020 and the activities related to the preparation for the introduction and piloting of the YG in Serbia were envisaged within the Employment Strategy in RS 2021-2026. Following the 2020 EC Communication on ‘An Economic and Investment Plan for the Western Balkans’ which included the YG as its flagship initiative, in July 2021, the Government of Serbia signed the ‘Declaration on ensuring sustainable labour market integration of young people’ at the 2nd EU-Western Balkans meeting on employment and social affairs and committed to developing a YG Implementation Plan by June 2022.

The Government established a high-level multi-departmental group as well as an expert group tasked with carrying out the preparatory activities, including the drafting of the YG Implementation Plan and capacity building for the members of two groups. During 2022, the appointed expert group prepared the analytical material for the development of the Youth Guarantee Implementation Plan and initiated its preparation. Due to a Government reshuffle in late 2022, the YG Coordination Body changed
EU priority 4: Attractive VET, based on modern and digitalised provision

Serbia has made varying levels of progress with regard to meeting the objectives within the EU priority area 4, with some challenges remaining across the thematic priorities. Legislative and institutional efforts to create conditions for the implementation of activities within EU priority 4 have been ongoing, with implementation results to follow. This area, however, includes some large-scale reform efforts requiring time to materialise. In some instances, reporting is not possible due to the lack of data (teacher training, lifelong learning) on activities affecting end users.

The above developments are analysed in the policy development fiches 7 and 8, as follows (for more details, see the policy development fiches on ETF OpenSpace):

7. Development of the state matura exam at the end of secondary education

(Thematic priority ‘Permeability between IVET and CVET and general and vocational pathways, academic and professional higher education’)

The MoE remains committed to introducing the final exam at the end of secondary education – the so-called State Matura – as a means of secondary education certification and qualification for enrolment in higher education. The introduction of the state matura exam is a long-term strategic objective taken by the government in the strategy prior to the SED 2030 and has been consistently pursued from then on. In practical terms, this reform will introduce a set of specific exams as follows: final examinations in the 3-year VET secondary education and the state matura exams pertaining to the general, artistic and VET matura exams at the end of 4-year secondary education programmes.

Three distinct courses of action have been the subject of continuous efforts by the MoE with support of the IPA 2015 funded project on state matura:

The design and piloting of the state matura exam, legal and organisational changes, preparations of the necessary materials and the delivery of tailor-made training packages aimed at building capacity of a variety stakeholders within the school system;

The alignment of the state matura exam efforts with the requirements of higher education institutions in the country, in order to allow state matura exam to replace the admission exams/enrolment procedures administered by the HEI themselves;

Communication and outreach to a set of various stakeholders of the reform.

Stakeholders working directly on this reform are of the view that communication efforts by the MoE should have been bolder as beneficiaries (students and parents, most of all) are not yet fully on board with the reform.

Following an intensive process that included design, consultations, approvals and capacity building with a wide range of stakeholders affected by this reform, the first round of piloting was carried out in the autumn of 2021. In addition to the MoE and its institutes (IEQE and IIE), secondary schools and regional school administrations as well as higher education institutions – all directly affected by this large-scale reform – took part in activities led by the MoE with support of the State Matura in the Serbia IPA 2015 project.

The second round of piloting was carried out between November 2022 and January 2023 when selected secondary vocational schools carried out a simulation of the practical part of the vocational examination on a sample of vocational qualifications.

The final stage of piloting of the state matura for the 4-year secondary schools is to be carried out in the form of mock exams, lessons to be used for final fine-tuning of the full state matura rollout. The MoE, with the Examination centre at IEQE, scheduled two mock final examinations at the end of secondary education - one for May 2023 and the other for spring 2024.
In 2022, MoE amended the Article 100 of the Law on Higher Education (2022), specifying the secondary education graduates’ pathways to higher education. This legal change required every higher education institution (HEI) in the country to develop and publish their own set of admission criteria and how those would be implemented in the course of student assessments and ranking at admission (recognising the state matura examination results and any additional HEIs’ requirements, which may include special abilities examination administered by individual HEIs).

The Covid-19 pandemic affected the deployment of funds through the IPA 2015 project on the State matura in Serbia. While significant progress has been made, the delays in the schedule for the state matura exam’s introduction are in tandem with resistance towards this reform shown by HEIs, the general public, students and parents, as the date of rollout is getting ever closer (for the 3-year VET profiles, full implementation of the final exam is expected in the school year 2022/23 and for students of all 4-year secondary schools in the school year 2023/2024). This high-stake reform could be further challenged if the next round of elections is scheduled for the year 2024.

8. Introduction of dual education at higher/tertiary education

(Thematic priority ‘Expanding VET programmes to EQF levels 5-8’)

The 2019 adoption of the Law of Dual Model of Studies in Higher Education has created legal conditions for the implementation of a new approach to HE aimed at increasing labour market relevance of HE and the employability of HE graduates; as well as the modernisation of the teaching process by way of cooperation between the higher education institutions (HEI) and companies from the real sector, prompted by technological advancements. As in the case of dual VET at secondary education level, dual education study model at HE requires HEIs’ collaboration with employers, i.e. employers’ involvement in the organisation and implementation of the work-based learning component.

In March 2021, legislative activities resulted in the revision of the rulebook on standards and the procedure for accreditation of the study programmes regulating to both academic and professional/applied programmes at HE. The first accredited dual study programs at higher education level (EQF 5 and 7) in Serbia were implemented in the academic year 2021/22 in a number of study fields, including in IT, the textile industry, mechanical engineering and aviation. In the academic year 2021/22, there were 32 dual study programmes and modules with about 150 students involved, with in-company work-placements.

In the academic year 2022/23, there are 34 dual study programmes and modules being delivered at 10 higher education institutions, with 95 accredited companies involved in this model of higher education.

Although students are required to choose the type of programme (dual or classic) on enrolment to a HEI, legislation allows the student to change their decision during the HE studies. No data is available about the application of this solution in practice of HE studies. So far, the VET system has not been seen as fully permeable. For instance, solutions allowing horizontal mobility of secondary school students between the general and VET tracks exist, but they are demanding on students and are rarely used, whereas creating conditions for students’ horizontal and vertical mobility within the formal education system is a condition for further harmonisation of the NQFS with EU policies.
Performance in relation to EU targets

The Republic of Serbia is in a position to report on one of three quantitative indicators set in the European Council Recommendation of 24 November 2020 on vocational education and training for sustainable competitiveness, social fairness and resilience 2020/C 417/01.

As the table below illustrates, in 2021 (the most recent available data) the employment rate of the country’s recent graduates was at nearly 60 percent for the age group between 20 and 34. This is significantly lower than the average observed for the EU-27 as well as lower than in some of the neighbouring EU member states, such as Croatia (69.9 percent) or Bulgaria (72.4 percent) for instance.

<table>
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<tr>
<th>VET Recommendation Indicator</th>
<th>Last available year</th>
<th>RS</th>
<th>EU-27</th>
<th>EU target (year)</th>
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<td>Employment rate for recent IVET graduates (20-34-year-olds) (%)</td>
<td>2021</td>
<td>59%</td>
<td>76.4%</td>
<td>82% (2025)</td>
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<td>Recent IVET graduates (20-34-year-olds) with a work-based learning experience as part of their vocational education and training (%)</td>
<td>2021</td>
<td>17.1%</td>
<td>60.7%</td>
<td>60% (2025)</td>
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<tr>
<td>Learners in IVET who benefitted from a learning mobility abroad (%)</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>8% (2025)</td>
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Source: LFS of the Statistical Office of the Republic of Serbia, data collected in May 2022, reported by Eurostat.

According to LFS data for 2021, 17.1% of recent VET graduates have a work-based learning experience as part of their vocational education and training. At the same time, the Economic Reform Programme of Serbia 2023-2025 indicates that 5.2% of students entered the first grade of secondary vocational schools with dual education programmes in the academic year 2021/2022.

Data on IVET learners benefiting from a learning mobility abroad is not regularly reported by public institutions.

Conclusions

Overall, Serbia has made significant progress towards meeting its NIP objectives, with some delays in implementation due to the political context (2022 was marked by elections and a late formation of the Government Cabinet), as well as the post-COVID-19 recovery. In the education sector, significant progress has been made in advancing legislative and institutional frameworks related to the observed priorities along with the increased overall level of activities related to VET reform. In addition to signing the Osnabrück Declaration and the EU Recommendations on VET in 2020, in its strategic documents – the latest state Strategy on Education Development and the ERP – Serbia prioritises objectives reported on in this brief as well.

The main policy developments in 2021 and 2022 largely correspond to the planned activities of the country. They are focused on the EU areas prioritised in NIP: (1) agile and resilient VET, adaptive to labour market needs; (2) flexible VET and inclusive, providing progression and lifelong learning opportunities; (4) attractive VET, based on modern and digitalised provision. The EU priority associated with quality assurance (area 5) is not covered by a separate policy development fiche although various quality assurance measures are reported on as a part of other relevant policy developments. Similarly, although most of the observed reform measures fall under the mandate of the Ministry of Education, they are typically implemented in cooperation with other public institutions and agencies, as well as with other non-governmental stakeholders, as required under the thematic priority ‘Engaging VET stakeholders and strengthening partnerships in VET’.
In general terms, while legislative and institutional frameworks within the observed thematic areas are gradually being rounded, there is a lack of data on implementation outcomes. Similarly, country data on ongoing and past activities and the planned deliverables are not always available. A key weakness of the current tracking system is the lack of data on learning and employment outcomes.

Some of the specific challenges to be addressed in the future include the need to set up monitoring practices to allow tracking both school-based and work-based learning practices in VET schools at both secondary and higher education levels. This is coupled with the need to increase involvement of companies for WBL for both secondary and higher education students.

There is a clear necessity to accelerate activities in the area of adult non-formal education by simplifying and supporting the accreditation of PROAEA that can provide training but, especially, those PROAEA that can be involved in the process of recognition of prior learning. The latter process was still in its infancy as of late 2022.

**References**

Detailed lists of references are available at the end of each Policy Development Fiche, available on ETF OpenSpace.