

WORK-BASED LEARNING IN MONTENEGRO – AN ASSESSMENT PER EU QUALITY STANDARDS

Authors: Zora Bogicevic (GREATVISORY), with inputs and support from Floriana Folisi and Stefan Thomas (ETF).

ETF Project team: Floriana Folisi, Simonetta Riva, Gordon Purvis, Stefan Thomas

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PREFACE

The study 'Work-based learning in Montenegro – an assessment per EU quality standards' has been produced by the European Training Foundation (ETF). The study was carried out between March and December 2024 by Zora Bogicevic, who also drafted this report. The report was quality checked by QA Expert Patrick Werquin and Project Director Michal Kowal (GREATVISORY).

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1. INTRODUCTION

The Montenegrin economy has shown a high degree of resilience after the COVID-19 pandemic. However, long-term youth unemployment remains a structural problem, with almost half of registered unemployed persons looking for employment for more than three years. The share of young people aged 15-29 who are not in employment, education or training (NEET) is high and amounts to over 20.3% (2023), limiting the availability of the workforce and fuelling skills loss or obsolescence (MLSW, 2024). Improving the framework for better youth employability and a faster transition for young people from education to the world of work is necessary. Therefore, policies that ensure education quality – with an emphasis on its relevance to the labour market – and policies on youth employment are among the key priorities in Montenegro.

One of the ways to provide comprehensive job support for young people across the EU is the reinforced Youth Guarantee. This is a key mechanism for ensuring a good quality offer of, for example, apprenticeships and traineeships for young people aged 15-29, and it directly underlines the importance of work-based learning (WBL). The reinforced Youth Guarantee advises the Member States to ensure that apprenticeship and traineeship offer adhere to the minimum standards laid out in the two frameworks: the quality framework for traineeships (Council of the European Union, 2014), and the European Framework for Quality and Effective Apprenticeships (Council of the European Union, 2018). Both frameworks, including the quality criteria which they define, are the basis for the analytical framework and the structure of this country report.

The report offers an overview and analysis of WBL in Montenegro, providing insights into various aspects of its design and implementation.

The key messages highlight the importance of aligning Montenegro's WBL practices with the European quality criteria, emphasising the progress made in recent years, while identifying areas for further improvement. The findings cover WBL in initial vocational education and training (IVET), WBL in continuing vocational education and training (CVET), and WBL in active labour market policies (ALMPs), corresponding to the three main chapters in the report.

In these chapters, based on the quality criteria from the two EU frameworks, the report addresses the key elements of WBL, specifically: types of programmes with a WBL component, contractual agreements, definitions of learning outcomes and assessment criteria, provision of pedagogical support to participants, social protection measures for learners, health and safety regulations in work-based settings, funding sources and cost-sharing arrangements for WBL initiatives, quality assurance, and learner tracking. The most important strengths and gaps/challenges are summarised at the end of each chapter devoted to IVET, CVET and ALMP.

In addition, the report includes a brief clarification of the most important concepts used, an outline of the methodology applied, an overview of the country employment profile, as well as a short description of the strategic, legal and governance framework of VET. Moreover, details of interviewees, a list of acronyms and references, and the quality criteria from the two EU frameworks are included at the end of the report.

Considering the structure and content outlined above, the report was conceived to inform policymakers, educators, employers and relevant stakeholders about the current state of WBL in Montenegro and to contribute to the debate on WBL both nationally and at regional level.

2. CONCEPTUAL CLARIFICATION

The Law on Vocational Education (MESI, 2021b) states that IVET programmes may last two, three and four years depending on the exit level (respectively, level II, III and IV1). The 'Methodology for preparing educational programmes in vocational education' (NEC, 2016), adopted by the National Education Council (NEC), roughly defines the scope of general education modules/subjects and vocational modules (including theory and practical training¹ with a mandatory learning component in the workplace – WBL)².

There are two ways of implementing VET³. The first, whereby practical training is carried out partly at a school and partly at an employer (i.e. WBL), is hereinafter called 'school-type' practical training. It is applied in all IVET programmes lasting two, three and four years, and the school is responsible for assessing learners. In this case, the mutual rights and obligations between the school and the employer are regulated by the 'practical teaching contract'. The second way, whereby the employer is responsible for all the practical training, which is carried out entirely at a workplace, is hereinafter called 'dual-type' practical training. The latter is only possible for three-year IVET programmes. The mutual rights and obligations of the learner and the employer in the dual-type system are governed by the 'practical education individual contract'⁴.

The Law on Adult Education (MESI, 2017) stipulates that CVET programmes that are implemented through practical work can be carried out by an employer or by another licensed provider of education and training. CVET programmes that include a WBL component are means by which a vocational qualification can be awarded.

The Employment Agency of Montenegro (EAM) is responsible for the implementation of measures related to the active labour market policy (ALMP), in accordance with the Law on Employment Mediation and Rights during Unemployment (MLSW, 2019). The programmes within the ALMP that contain a WBL component are CVET programmes for obtaining vocational qualifications (in the case of the 'Education and training' programme), and programmes for obtaining practical skills (in the case of the 'Training for working with the employer' and 'Training for independent work'⁵ programmes).

¹ In the Law on Vocational Education, the terms used are: practical education (*praktično obrazovanje*) and practical teaching (*praktična nastava*) (see Article 35, 'Forms of educational work'). This report uses the term 'practical training' for simplicity.

² In the IVET programmes that were in use until 2017 and were implemented entirely at schools, professional practice lasting up to 15 days was also implemented for learners who had completed practical training at a school only.

³ The qualification gained by completing a specific three-year programme (for example, waiter) in the school type and dual type of practical training is the same, and the diploma has the same content.

⁴ In the Law on Vocational Education, the terms used are: contract on practical teaching (*ugovor o praktičnoj nastavi*) and individual contract on practical education (*individualni ugovor o obrazovanju*). This report uses these two terms, however, the reader should be aware that they both refer to practical training carried out at an employer, i.e. WBL.

⁵ This should be interpreted as training designed to facilitate self-employment.

3. METHODOLOGY

The report on WBL in Montenegro was prepared based on an analysis, against EU quality standards in the relevant field, of:

- laws, regulations, methodological and other documents, adopted by the National Education Council (NEC) and the Qualifications Council (QC), strategic documents of the Ministry of Education, Science and Innovation (MESI), available analyses and reports by relevant institutions and organisations;
- information obtained during interviews with representatives of the MESI, the Centre for Vocational Education and Training (VET Centre), and the Chamber of Economy of Montenegro (CEM).

4. COUNTRY OVERVIEW

Montenegro is a country with a total of 623 633 inhabitants (2023). In the last two decades the population has become older, with an increase in life expectancy⁶. According to the records of the EAM, the number of registered unemployed people was 38 161 at the end of January 2024, which is 13.46% lower than at the end of January 2023 (EAM, 2024b). More than 45% of unemployed people have medium-level qualifications (ISCED 3). High out-of-labour-force rates, particularly among women, limit workforce availability and fuel skills loss or obsolescence. According to forecasts, the unemployment rate will be 11.6% in 2026 (Government of Montenegro, 2024).

The total state investment in ALMPs is 0.2% of GDP⁷, and the coverage of unemployed people is quite low. The priority given to young people is, however, evident, as they make up over 40% of the participants in ALMPs (EAM, 2024d). In the second quarter of 2023, the activity rate (for people aged 20-64) was 76.2% (Government of Montenegro, 2024). According to the functional assessment conducted by the ILO in 2019, the provision of services and employment programmes to unemployed persons – career guidance and counselling (CGC), employment, referral to active employment programmes – is limited by an outdated service provision model, a lack of administrative capacity and the fact that there is no marketing strategy for employers. One of the challenges is the insufficient development of monitoring and evaluation systems (ILO, 2020).

The implementation plan of the ‘Youth Guarantee’ programme until 2026 (MLSW, 2024) states that there were approximately 33 500 young people aged 15-29 in Montenegro who were NEET in 2020. The NEET rate among upper secondary and university graduates in 2023 was 20.3% (MLSW, 2024, Government of Montenegro, 2024).

The Programme for International Student Assessment (PISA) was conducted in 63 schools, of which 49 were high schools, mixed and vocational schools. Of those 49 secondary schools, six of them are above the OECD average, one is at the OECD average and the remaining 42 schools are below the OECD average⁸.

Table 1: Results of the PISA testing of students from Montenegro in the last three cycles

Subject	2015	2018	2022
Reading	427	421	405
Mathematics	418	430	406
Science	411	415	403

Source: Prepared by the author based on data from the Examination Centre of Montenegro (Examination Centre, 2023)

⁶ Statistical Office of Montenegro, <https://www.monstat.org/cg/>

⁷ Professional training of university graduates is excluded.

⁸ The OECD average in the last three cycles for all areas is from 480 to 500 points.

5. THE FRAMEWORK FOR WORK-BASED LEARNING IN MONTENEGRO

The Economic Reform Programme (ERP) 2024-2026 (Government of Montenegro, 2024) sets out the goal of a smart, sustainable and inclusive economic growth that will contribute to improving the quality of life of all its citizens. It also defines the reform measures 'Introduction of the Youth Guarantee programme in Montenegro' and 'Development of an integrated approach to increase the quality and inclusiveness of education'.

The Ministry of Education, Science and Innovation (MESI) is responsible for all levels of education and subsectors (including IVET and CVET) in terms of planning, implementing and improving the education policy. Institutions and professional bodies also take part in the governance/management of the Montenegrin VET system.

The Centre for Vocational Education⁹ (VET Centre) is responsible for the development of vocational education and training and for quality assurance in the area of vocational education and training and adult education. The VET Centre is in charge of developing qualification standards, IVET and CVET programmes, advisory support and research for the vocational education and training of young people and adults.

The Bureau for Educational Services (BES) defines and ensures quality in pre-university education. An external assessment of knowledge at the end of the four-year secondary education and training cycle is conducted by the Examination Centre¹⁰. The Examination Centre is also responsible for training external examiners in the examination procedure for obtaining a vocational qualification.

The National Education Council (NEC) has an advisory role in relation to programmes, standards and general issues regarding the quality of education at all pre-university levels, including IVET and CVET. Standing working bodies of the NEC include committees for general, vocational and adult education. The Qualifications Council (QC) works on improving the qualifications system and the approval and classification of qualifications in the NQF. The QC has established 15 sectorial committees¹¹.

Secondary vocational education and training in Montenegro is provided in accordance with the General Law on Education (MESI, 2021a) and the Law on Vocational Education (MESI, 2021b). The programme types are shown in Table 2.

Table 2: Types of IVET programmes

Programme	Duration	NQF level
Lower vocational education and training	Two years	II
Secondary vocational education and training	Three years	III
Secondary vocational education and training	Four years	IV1
Master examination ¹²	One (additional) year	IV2
Higher vocational education and training	Two (additional) years	V

Source: Prepared by the author based on: Law on Vocational Education (MESI, 2021b), Law on National Qualification Framework (MESI, 2010), EU Eurydice website¹³

⁹ VET Centre: <https://www.gov.me/cso>

¹⁰ The graduation examination at the end of the two-year and three-year programme is the responsibility of the school.

¹¹ The Qualifications Council reviews qualifications of all types and levels.

¹² The master's examination programme is adopted by the NCE, upon the proposal of the VET Centre, in accordance with the occupational standard and the qualification standard. The name of the programme and the qualification is the same.

¹³ EU Eurydice website, available at: <https://eurydice.eacea.ec.europa.eu/me/national-education-systems/montenegro/organisation-vocational-upper-secondary-education>

5.1 Vocational education and training strategies

The country's main strategic documents in the field of vocational education and training are provided below.

The Strategy for the Development of VET 2020-2024 (MESI, 2019b) addresses operational goals: 1) vocational education and training to gain skills, competences and qualifications for employability, lifelong learning, inclusiveness, personal development and active citizenship; 2) vocational education and training relevant for individuals, the labour market and society, and which is accessible and innovative; 3) comprehensive, high-quality and effective vocational education and training, with management and funding that encourages excellence and efficiency.

The Adult Education Strategy of Montenegro 2015-2025 (Government of Montenegro, 2014) defines the priority objectives as: 1) social inclusion of adults through lifelong learning programmes and activities; 2) improvement of adults' knowledge, skills and competences for employability, labour market mobility and competitiveness; 3) improvement of employees' competences, quality assurance in adult education and training, ensuring a flexible and sustainable adult learning system.

The National Employment Strategy 2021-2025 (MED, 2021) defines the priorities and measures for encouraging and increasing employment, reducing unemployment, the efficient functioning of the labour market, improving the labour supply and qualifications, and promoting equal opportunities.

The Education Reform Strategy 2025-2035 is being prepared, in accordance with the recommendations of the 'Education sector analysis' in Montenegro (2015-2020) (UNICEF Montenegro and MESI, 2022). The MESI, in cooperation with UNICEF, started developing a strategy to define the vision of education and training, the main goals, and the activities that need to be implemented to achieve them.

The Youth Guarantee provides policy reforms and initiatives in the areas of education and training, work and employment, social protection and young people (improving the position of young people and building the capacity of key stakeholders to formulate, implement and monitor youth employment policies). The main challenges facing the EAM are ensuring the timely introduction of the policy reforms required by the Youth Guarantee, and difficulties in involving inactive young people (EAM, 2024c).

5.2 Policy dialogue and the role of actors at national level

The QC and the NEC comprise a diverse group of representatives: universities, associations of employers and trade unions, representatives from the education and training sector, and other stakeholders. Through a systematised involvement in the work of the councils and their working bodies, all relevant partners can contribute to national policies in vocational education and training, including the content of occupational and qualification standards and of IVET and CVET programmes. The involvement of associations of employers in the organisation and evaluation of IVET and CVET providers is less prevalent.

The Chamber of Economy of Montenegro (CEM) and the Employers Federation of Montenegro (EFM) provide an opinion on occupational standards. The EAM provides labour market information. The partners do not participate in the financing of vocational education and training, except for the fees covered by the CEM¹⁴. The recommendations by UNICEF (2022) and ETF (2019) to more systematically involve players from the world of work, as well as regional and local stakeholders, in Montenegro's VET governance and financing model remain valid.

¹⁴ The CEM covers fees for 20 first-year learners every year in dual-type practical training.

5.3 Legal framework

The Law on Vocational Education (MESI, 2021b) defines in more detail the conditions and procedures for enrolling learners in vocational schools, the organisation of teaching, types of programmes, assessment, types of examinations, profiles and level of teachers' education, and other issues of importance for the organisation of educational work at school. The provisions of this Law are consistent with the goals and activities in the Strategy for the Development of VET (2020-2024).

The Law on Adult Education (MESI, 2017) defines the principles of adult education and training, types of CVET programmes and methods of adult education and training. CVET programmes for obtaining vocational qualifications, prepared in accordance with the Law on Adult Education and the Law on Vocational Education, are applied in the implementation of ALMPs.

If the conditions defined in the 'Rulebook on norms and standards for acquiring funds from public revenues for institutions that implement publicly valid educational programmes' (MESI, 2013) (more than 70 learners who receive practical training, or some practical training, at the employer) are met, the VET school is allowed to create a new job post – 'organiser of practical training'. This may be a teacher from the VET school or a person who applies for the competition. Their task is to improve cooperation between schools and employers, for both school-type and dual-type practical training.

Certain areas covered in the General Law on Education (MESI, 2021a) and the Law on Vocational Education (MESI, 2021b) are elaborated on in more detail in the regulations (e.g. quality assurance, professional development of teachers, assessment of learners) (MESI, 2004, MESI, 2009, MESI, 2020).

6. WORK-BASED LEARNING IN INITIAL VOCATIONAL EDUCATION AND TRAINING

6.1 Types of programmes with a WBL component

IVET programmes of a two-year, three-year and four-year duration contain a WBL component, in accordance with the 'Methodology for preparation of educational programmes in vocational education' (NEC, 2016), which states that all IVET programmes should include a learning component in the workplace. The methodology roughly defines the scope of the general education modules/subjects and vocational modules in IVET programmes. The IVET programme for a specific qualification defines the number of theory lessons¹⁵ and the number of lessons of practical training that include mandatory WBL as part of the vocational modules (see Table 3 and Table 4). The total duration of the two-year IVET programme is 2 208 lessons, of the three-year IVET programme 3 360 lessons, and of the four-year IVET programme 4 512 lessons. The number of IVET programmes adopted by the NEC is shown in Table 5.

Table 3: General education modules and vocational modules in relation to the total pool of lessons per grade

Grades ¹⁶	Level II		Level III		Level IV1	
	General modules %	Vocational modules %	General modules %	Vocational modules %	General modules %	Vocational modules %
First grade	50	50	46.9	50	50	46.9
Second grade	42.5	57.5	31.3	65.6	43.8	53.1
Third grade	-	-	25.7	71.2	37.5	59.4
Fourth grade	-	-	-	-	31.3	65.6

Source: Prepared by the author based on data from the Institute for Textbooks and Teaching Aids¹⁷

Table 4: Examples of the ratio of theory (T) and practice (P) lessons in IVET programme vocational modules

Programme	First grade		Second grade		Third grade		Fourth grade	
	T %	P %	T %	P %	T %	P %	T %	P %
Confectioner's assistant (level II)	23	27	13.6	52	-	-	-	-
Electrician (level III)	25	25	21.9	43.7	6.2	65.6	-	-
Gastronomy (level IV1)	22	19	15.6	31	15.6	34.4	22	34.4

Source: Prepared by the author based on data from the Institute for Textbooks and Teaching Aids¹⁸

¹⁵ One lesson lasts 45 minutes.

¹⁶ In all grades in level III and IV1 programmes, free activities are planned for 3.1% of lessons.

¹⁷ <https://zuns.me/product/7491>

¹⁸ Ibid

Table 5: Number of IVET programmes

Level	Number of programmes
II	5
III	33 ¹⁹
IV1	47
IV2	–
V	4 ²⁰

Source: Prepared by the author based on data from the VET Centre

Although some two-year IVET programmes have been adopted (see Table 5), they are not being implemented in schools because there are no learners interested in enrolling in these programmes.

Practical training in three-year IVET programmes may be the responsibility of a school or an employer, while the IVET programme itself is the same in both cases. Thus, there are the following possibilities:

- The school is responsible for monitoring and assessing the learners – in school-type practical training – with teachers supervising learners during practical training at a school and during WBL, and in-company trainers providing support for learners to acquire skills for an occupation during WBL.
- The employer is responsible for the practical training as a whole – in dual-type practical training – with in-company trainers supervising learners during WBL and providing support for learners to acquire skills for an occupation. In this case, a three-member committee in which, in addition to practical training teachers, there are also in-company trainers, assesses learners at the end of a school year (MESI, 2009).

Dual-type practical training is implemented only for three-year programmes. The scope of WBL is different from school to school even for the same IVET programme. It depends on the conditions and possibilities that the employer and the school have.

In four-year IVET programmes, the scope of practical training in the vocational modules is smaller than in the three-year programmes due to the larger general education content. For programmes in the field of economics and law, WBL usually consists of 36 lessons per year in the 3rd and 4th grade. In the case of programmes in the fields of electrical engineering, mechanical engineering and traffic, the proportion of WBL is comparatively higher.

Trends

Data from the MESI shows that the number of learners enrolled in three-year IVET programmes (level III) is increasing (see Table 6). Also, for certain IVET programmes at this level, there is a trend of maintaining the same or increased interest. This tendency is present in the following programmes: car mechanic, hairdresser, cook, waiter, electrician, gastronomy, electrical technician in the energy field, electrical technician for web and mobile applications, etc. The list of all IVET programmes adopted by the NEC, classified by sector and duration/levels, is updated by the VET Centre²¹. There is a tendency for the number of learners in dual-type practical training to decrease in the 3rd grade compared to the

¹⁹ Not all three-year educational programmes are implemented in dual-type practical training, as there is a lack of interest from both learners and employers in some programmes. Depending on the school year, the number of programmes in dual-type practical training in which learners participate ranges from 15 to 25.

²⁰ The higher vocational education 'Higher Gastronomist', 'Higher Restaurateur' and 'Prison Policeman' programmes have not been implemented. The Policeman education programme is being implemented.

²¹ IVET programmes used to be accessible on the VET Centre website: <https://www.gov.me/cso/strucno-obrazovanje/standardi-zanimanja-obrazovni-programi-ispitni-katalozi> and <https://www.gov.me/cso/strucno-obrazovanje/standardi-zanimanja-obrazovni-programi-ispitni-katalozi/objedinjeni-nastavni-planovi-u-modularizovanim-obrazovnim-programima>. However, these links do not work due to a temporary or permanent malfunction. The programmes can be found on the website of the Institute for Textbooks and Teaching Aids, available at: <https://zuns.me/product/7491>.

2nd grade. It might be due to the obligation of employers to pay remuneration to learners during their 3rd-grade practical training (ETF and ILO, 2020).

Table 6: Number of learners in different forms of vocational education and training

		2018/2019	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024
Level III	School type	1,195	2,746	2,825	3,339	3,314	3,367
	Dual type	570	834	755	538	410	463
Level IV1		16,291	15,247	14,738	13,441	13,449	14,074

Source: Prepared by the author based on MESI data

The analysis below was guided by the criteria of the European Framework for Quality and Effective Apprenticeships (EFQEA).

6.2 Written agreement (Criterion 1)

There are two types of contracts.

Type A: Contract between the school and the employer/company

In the case of school-type practical training, in IVET programmes lasting two, three or four years, the mutual rights and obligations of the school and the employer are regulated by the 'practical teaching contract'. This contract is concluded by the school director and the employer (VET Centre and MESI, 2018). The school determines the requirements that the employer must fulfil in order to participate in WBL. The practical teaching contract contains information about the obligations of the school, learners, the employer and the in-company trainers, including the number of lessons the learner must attend with the employer, safety at work and other aspects for conducting WBL. Compensation for learners is not foreseen. The practical teaching contract is determined at the beginning of the school year, for each educational programme and each grade, and is signed for one grade.

Type B: Individual contract between the company and the parent(s) or learner, co-signed by the school

In the case of dual-type practical training (only in three-year IVET programmes), the mutual rights and obligations of the learner and the employer are regulated by an 'practical education individual contract' signed by the employer and the learner's parent or the learner (depending on their legal age), in accordance with the Law on Vocational Education. The school is also one of the signatories of this contract because the school is still responsible for taking care of the learner and his/her training. The conditions that the employer must meet are set by the VET Centre. The contract includes essential information such as details about the learner, the employer and the programme. It also outlines the scope of practical skills the employer must provide, the WBL schedule throughout the school year, the rights and duties of the learner, the responsibilities of the employer, information about in-company trainers, the monthly allowance the learner receives during WBL and other matters related to WBL. The individual contract is signed for all three grades.

6.3 Learning outcomes (Criterion 2)

All VET qualifications for levels II to V are developed based on the methodological document adopted by the QC (Qualifications Council, 2012). Education qualifications and vocational qualifications are based on the complexity of the intended learning outcomes. The learning outcomes for three-year IVET programmes for school-type and dual-type practical training are the same. For level II to V qualifications, the VET Centre, together with all relevant partners, develops the occupational and

qualification standards. Credit points are awarded to learning outcomes that are grouped into qualification units. In line with the qualification standards for educational qualifications, the VET Centre develops an IVET programme with learning outcomes. If a standard is being developed for a vocational qualification, the CVET programme and the examination catalogue for obtaining the vocational qualification will also be developed.

6.4 Pedagogical support (Criterion 3)

The laws do not stipulate that in-company trainers need a special licence to work with learners. A training programme was prepared for in-company trainers by the CEM, the VET Centre and the MESI. Key support for in-company trainers in the organisation and implementation of WBL is provided through direct contact with practical training teachers and organisers of practical training. 'Although they receive significant support in their work from practical training teachers and coordinators, especially in planning practical training, in-company trainers have significant difficulties in assessing learners' achievements in practical training' (ETF and ILO, 2020).

Table 7: Requirements for teachers, in-company trainers and organisers

Type of requirement	Practical training teachers	In-company trainers	Organisers of practical training
Employed	At school	By the company	At school
Level of qualification	IV2, VI, VII1	At least the same as the learners they teach	IV2, VI, VII1
Minimum work experience	1 year	5 years	-
Professional examination required to work with learners ²²	yes	no	no
Licence required to work with learners ²³	yes	no	no

Source: Prepared by the author based on the Law on Vocational Education, Articles 100-105 (MESI, 2021b)

An in-company trainer can be a person who has an appropriate education of at least the same level as the qualification framework for which the learner is being taught, as well as five years of work experience in the field (MESI, 2021b). In-company trainers should meet the basic requirements for working with learners (see Table 7). Since 2020, in-company trainers have not been receiving systematic pedagogical support. In-company trainers do not receive additional compensation for their work with learners²⁴.

Organisers of practical training²⁵ act as coordinators between the school and the employer/in-company trainer. WBL planning in dual-type practical training is mainly the result of joint efforts by practical training teachers and in-company trainers. 'Good planning and implementation are critical factors for student success in dual VET and some employers may be too passive and may not have enough trained in-company trainers to participate fully in that process' (ETF and ILO, 2020).

6.5 Pay and/or compensation (Criterion 5)

²² In accordance with Article 100a of the General Law on Education (MESI, 2021a), the condition for employment of teachers is passing a professional examination to work in educational institutions. The examination is taken after a one-year internship.

²³ Teacher jobs can be performed by a person who, in addition to the conditions prescribed by the Labour Law and the General Law on Education, has a work permit (licence).

²⁴ Schools keep records of the number of employers where a part of practical training is implemented, as well as the number of in-company trainers and their educational profiles. Consolidated data on the number of employers and in-company trainers in school-type practical training is not available.

²⁵ Austria's Agency for Education and Internationalisation (OeAD), available at <https://oead.at/en/>

Learners who carry out WBL in school-type practical training are not provided with compensation.

Learners who are learning in dual-type practical training have the right to compensation for the duration of the contract. The amount of compensation is a percentage of the average net salary in Montenegro: for the first year of learning at least 10%; for the second year of learning at least 15%; and for the third year of learning at least 20%. Funding for the fees for the first and second year of education is provided by the MESI, and for the third year of education by the employers (MESI, 2021b, Article 49).

6.6 Work, health and safety conditions (Criterion 7)

Learners in the school-type system and in dual-type practical training are insured in case of accidents. Funding for insurance is provided by the school. For each grade of all educational programmes, at the beginning of the vocational module topics related to health and safety at work are defined. These topics are implemented with learners by practical training teachers. In cooperation with the employer, for learners who carry out WBL, in-company trainers or the employer demonstrate and teach the learners how to take care of their health and how to implement safety measures.

6.7 Regulatory framework (Criterion 8)

Vocational education and training is regulated by the Law on Vocational Education. It is covered in detail in Chapter 5, section 5.3, where the responsibilities of the partners in the implementation of practical training are laid out.

6.8 Involvement of social partners (Criterion 9)

Employer organisations and trade unions are visible in the work of national advisory bodies, which are decision-makers in relation to setting learning outcomes, programmes and strategic documents in the field of education. Social partners are not involved in the implementation of WBL and do not participate in the assessment of learners and in the determination of the quality, except for dual-type practical training when they provide compensation to learners in the 3rd grade. Together with schools, individual employers participate in the planning and implementation of WBL and the placement of learners.

6.9 Support for companies (Criterion 10)

Financial support for employers is provided through funds from the state budget. The training allowance in the first and second year of the three-year dual programmes is paid by the state. The employer provides funding for fees for third grade learners. The employer is not obligated to provide the learners with a pension or health insurance.

6.10 Flexible pathways and mobility (Criterion 11)

Learners are educated according to the same educational programme, regardless of whether it is school-type or dual-type practical training (the latter only for three-year programmes). Learners who carry out WBL in accordance with the contract between the school and the company, for example the 'Electrician' programme, and learners who follow dual-type practical training with an individual contract receive the same diploma after completing their education and training. They can continue their education and training in four-year programmes to obtain a level IV1 qualification, after passing additional examinations. After that, they can continue their education and training at higher education institutions. Learners who complete four-year programmes can continue their education at higher education institutions, regardless of where they completed their practical training.

6.11 Career guidance and awareness raising (Criterion 12)

Most of the information and CGC activities carried out by the school's career guidance teams in VET schools are intended for final year learners transitioning to the next level of education (9th grade in primary schools and 3rd and 4th grades in VET schools) (EAM, 2020). The career guidance activities themselves tend to provide information on a choice of further schooling rather than deal with career guidance and counselling. There is often very little information on the labour market (ETF, 2022).

Some vocational schools inform learners about dual-type practical training. VET schools organise open days for primary school pupils, prepare flyers with information about the educational and training offer and organise competitions in the fields of tourism, hospitality and electrical engineering. Training for schools' career guidance teams is organised periodically, depending on teachers' interests (ETF, 2022). In school career guidance team training programmes, the emphasis is on the development of learners' skills, supporting them depending on their preferences and interests. Components related to the role and importance of WBL and dual-type practical training are less represented. Similarly, data relating to employers who offer employment after the completion of three-year and four-year VET schools is present to a limited degree. Learners' interest in participating in CGC programmes implemented by the EAM is low. In general, learners do not have enough information about the needs of the labour market and employment opportunities²⁶.

The NEC²⁷ supports CGC activities (Euroguidance Centre in Montenegro, 2019). The document 'National career development support system review – Montenegro' states that formal education does not provide CGC in a systematic way and usually only provides basic information about the possibilities of further education (ETF, 2022).

6.12 Transparency (Criterion 13)

The competition for enrolling learners in the 1st grade of secondary school contains information about the IVET programmes implemented by schools. Information about the three-year programmes that can be implemented in dual-type practical training for each school can also be found in that competition. The number of places available for dual-type practical training is determined by schools, in cooperation with employers, before the announcement of the competition.

There is no national database of company vacancies for WBL. During enrolment, schools assign learners interested in the dual programmes to employers, in accordance with established criteria (learners success; interviews with learners, teachers, employers and parents; learners' interest in particular companies, etc.). Preference is given to learners with special education needs. Learners from a city can apply for any programmes and types of education and training at schools in another city. Information on the number of places available for dual-type practical training is available at the respective VET school.

Within the Montenegro Education Information System (MEIS)²⁸, there is a web application devoted to practical training, in which schools are expected to enter data on learners – the employer with whom learners are placed, scope of WBL for all programmes and lessons, etc. While the concept is good, schools have been reluctant to start applying it, one of the reasons being frequent changes in school management.

6.13 Quality assurance and tracking of apprentices (Criterion 14)

In accordance with the provisions of the General Law on Education (MESI, 2021a) and the provisions of the Rulebook on the content, forms and methods of ensuring the quality of education in institutions

²⁶ VET Centre, vocational education section available at Government of Montenegro portal: <https://www.gov.me/cso/strucno-obrazovanje>

²⁷ Euroguidance Centre in Montenegro – Ministry of Education in Montenegro, <https://euroguidance.eu/montenegro>

²⁸ The MEIS (<https://www.meisportal2.edu.me/>) was introduced in 2010. It is a centralised database for all educational institutions at all levels, including adult education providers, public and private. It also includes a web application that collects data into a single database.

(MESI, 2020), the determination of quality in institutions for formal education is carried out externally (every four years) and internally (self-evaluation, once a year for certain areas, and every two years for all areas). The external evaluation is carried out by the VET Centre, which prepares a report containing information about implementation of the teaching process in the school and implementation of WBL, cooperation with employers, assessment, quality of care for learners, etc. One of the quality indicators in the report is whether the school follows up on learners after they have completed their education and training. The reports propose measures to improve the quality of education and training.

6.14 Conclusions

Strengths

- The individual contract between the school/parent/learner and the employer regulates mutual rights and obligations. (Criterion 1)
- All educational and training programmes are based on learning outcomes and have a WBL component. (Criterion 2)
- Practical training teachers and organisers of practical training (both employed by VET schools) support the organisation and implementation of WBL in close collaboration with in-company trainers. There are defined criteria for being an in-company trainer. There are programmes for training in-company trainers. (Criterion 3)
- Learners in dual-type practical training have the right to compensation for the duration of the contract (percentage of the average net salary: at least 10% for 1st year, at least 15% for 2nd year, at least 20% for 3rd year). (Criterion 5)
- All learners have accident insurance provided by the school. Health and safety is an integral part of practical training. (Criterion 7)
- There is a regulatory framework in place to enable dual-type practical training. (Criterion 8)
- All involved partners have gained some experience in the implementation of WBL. Social partners are involved in advisory bodies and committees. Their participation in these bodies and committees is mandatory. Employers' associations are involved in developing standards, programmes and the scope and content of WBL. (Criterion 9)
- To support dual-type practical training and reduce the employer's financial expenses, learners' wages in the first and second grade are provided from the state budget. Companies provide compensation to learners in the third grade. (Criterion 10)
- The regulations enable the horizontal and vertical transfer of learners – change of programme or continuation of education and training. (Criterion 11)
- VET schools promote their offer for learners in the final year of primary school. Information sessions about IVET programmes are conducted for learners. (Criterion 12)
- Competitions for enrolling first grade learners include information on the dual programmes available. Within the Montenegro Education Information System, there is a web application devoted to practical training in which schools can enter data on learners. (Criterion 13)
- An external evaluation of the work of schools is carried out every fourth year. Self-evaluation is mandatory for schools and takes place mostly every two years. (Criterion 14)

Challenges / gaps

- Training of in-company trainers is not mandatory. Support mechanisms for in-company trainers (pedagogical, material, networking opportunities) are not sufficiently developed. (Criterion 3)

- Companies have no obligation to provide a pension or health insurance to learners (on the other hand, this does reduce the employer's costs for training learners). (Criterion 6)
- Employers' associations actively participate in the creation of policies in VET by participating in councils. However, there is no systemic participation of employers' associations in the organisation, implementation and evaluation of practical training. (Criterion 9)
- When learners are in the third grade and are required to receive compensation by the employer, a significant number of employers stop participating in dual-type practical training. (Criterion 10)
- Career guidance activities only tend to provide information on a choice of further schooling rather than deal with career guidance and counselling. While there are positive examples where both employers and their associations promote the importance of school-business cooperation, their promotion is ad hoc and not available to learners, parents and employers to a sufficient extent. There is no systematic, continuous promotion of school-business cooperation through the various communication channels, and awareness needs to be raised about the importance and advantages brought by such a cooperation. (Criterion 12)
- The procedures for selecting companies for the implementation of WBL in school-type practical training (when the school is responsible for the assessment of learners) are the school's responsibility. Learners are placed in companies in accordance with the school's internal procedures, which vary from school to school. In the case of dual-type practical training, the VET Centre defines the procedures for determining the conditions the employer must meet for the implementation of WBL. The criteria for the selection of companies for dual-type practical training are not available to employers. (Criterion 13)
- Schools do not fully utilise the potential of the MEIS applications related to practical training as data on learners and employers is not regularly updated. (Criterion 13)
- Tracking learners' destinations varies from school to school. A learner tracking system at national level has not yet been established. WBL monitoring is still in its initial phase. (Criterion 14)

7. WORK-BASED LEARNING IN CONTINUING VOCATIONAL EDUCATION AND TRAINING

7.1 Types of programmes with a WBL component

In accordance with the Law on Adult Education, CVET programmes with a WBL component are programmes for training, retraining, additional training and specialisation. These programmes are adopted by the Ministry of Labour and Social Welfare (MLSW), on the proposal of NEC. If these programmes are based on occupational and qualification standards, they lead to the acquisition of vocational qualifications, and are prepared in accordance with the methodology for developing adult educational programmes (NEC, 2019). These vocational qualifications are part of the NQF.

The Law on National Vocational Qualifications (MESI, 2016a) allows individuals to acquire a nationally recognised vocational qualification²⁹, levels II-V, by testing their knowledge, skills and competences after completing a CVET programme, in accordance with the examination catalogue. Being unemployed is not a requirement for following a CVET programme.

CVET programmes contain a list of all the modules and qualification units, the number of lessons for the theory and WBL parts for each module/qualification unit³⁰ (MESI, methodology for creating education programmes), the learning outcomes and criteria for achieving these, etc. The NEC has adopted more than 125 different CVET programmes, including programmes for the acquisition of vocational qualifications. Examples of programmes that can lead to a vocational qualification are: cook of simple dishes, tourist guide, construction machine operator, etc.

According to the MESI data, in 2023, 128 licensed education providers were engaged in adult education. During the year 2023, based on the data submitted in the MESI database³¹ and the data on the institutions that were involved in the implementation of the Annual Adult Education Plan for the year 2023, 34 961 participants were involved in various forms of educational activities. In the MESI database data is grouped into areas, in accordance with the Law on Adult Education (vocational qualifications, key qualifications, key skills, professional development, etc.) and the provider enters the data into the database. According to the EAM data from 2023 (EAM, 2024c), those most interested in vocational qualifications are accounting technicians (93), protectors of property (28), caregivers (10), organisers of caregivers' work (8), administrative technicians (14) and others. The share of WBL in several of these programmes, leading to a vocational qualification, is given in Table 8.

According to the MESI data³², CVET programmes with a WBL component in various fields were completed by 1 135 persons in 2022, while the number of persons who completed these programmes in 2023 was 994.

Table 8: Examples of the share of WBL in CVET programmes leading to a vocational qualification

Programme	Number of lessons		
	Theory part	Practical exercises	WBL
Cook of simple dishes	313	25	486
Tourist guide	325		375

²⁹ The educational programme, which leads to the acquisition of a qualification at a certain education level, is based on several occupational standards. A vocational qualification is based on a single occupational standard.

³⁰ Some programmes have exercises which are usually carried out in companies. WBL is always implemented in a real working environment, in companies.

³¹ UNICEF and Ministry of Education, Science and Innovation of Montenegro, School Statistics, available at:

<https://skolskastatistika.edu.me/#>

³² Ibid

Programme	Number of lessons		
	Theory part	Practical exercises	WBL
Construction machine operator	35		300
Caregiver	216		288
Accounting technician	135		219

Source: Prepared by the author based on the educational programmes adopted by the National Council for Education

In terms of education for acquiring key competences, the MESI data³³ for 2022 reveals that ICT courses were completed by 113 people, and foreign language courses by 1 017 people, compared to 145 and 1 110 people, respectively, for 2023. This shows a growing interest in acquiring key competences rather than in training for vocational qualifications.

The analysis below was guided by the criteria of the European Framework for Quality and Effective Apprenticeships (EFQEA).

7.2 Written agreement (Criterion 1)

An education provider that is licensed by the MESI can be a contractor for vocational qualifications programmes. The contract between a licensed education provider (the company or the VET school licensed as a provider of CVET programmes) and a candidate defines the rights and obligations of both parties. The contract stipulates: the number of lessons for the theory part, practical exercises and WBL, the time and place for implementation of parts of the programme, the profile of the teachers and in-company trainers, the costs of training, rules on health and safety protection, etc. The candidates bear the costs of undertaking the CVET programme themselves. The duration of the contract depends on the duration of the CVET programme. Short programmes can have a duration of 8-16 lessons. Programmes for obtaining vocational qualifications can have a duration of up to 1 120 lessons.

7.3 Learning outcomes (Criterion 2)

Learning outcomes in all CVET programmes leading to a vocational qualification are defined in the qualification standard and are linked to jobs in the occupational standard. Procedures for the preparation of occupational standards, qualifications and learning outcomes, CVET programmes and examination catalogues are developed on a partnership basis, with the participation of all relevant stakeholders in working groups³⁴.

7.4 Pedagogical support (Criterion 3)

Programmes for vocational qualifications specify the conditions for teachers and in-company trainers. In the process of licensing providers, it is determined whether they meet the requirements in terms of profile and level of education, as well as andragogic qualifications³⁵. Fulfilment of these conditions is mandatory. Andragogic training is carried out by the VET Centre³⁶.

In accordance with the Law on National Vocational Qualifications, licensed providers for adult education conduct assessments for national vocational qualifications at MQF levels 2-5. The assessment is conducted in accordance with the examination catalogue for each vocational

³³ Ibid

³⁴ The procedures for developing occupational standards, qualifications and programmes are the same for IVET and CVET.

³⁵ The andragogic qualification of training staff at the provider is a requirement for licensing all providers in accordance with the 'Rulebook on the detailed method and procedure for the implementation of andragogic training' (MESI, 2018a)

³⁶ EPAL, <https://epale.ec.europa.eu/me>

qualification³⁷. For those who fulfil the relevant criteria and want to become an assessor, the Examination Centre (MESI, 2018b) organises mandatory assessors training programme³⁸. The assessor receives an assessor's licence for five years. The licence is issued by the MESI upon the proposal of the Examination Centre. For each vocational qualification, a list of assessors is formed, from which the licensed provider forms an examination committee.

7.5 Workplace component (Criterion 4)

The training plan, the duration of the CVET programme, and the number of theory and WBL lessons are specified in the programmes for each of the qualifications. At the beginning of the training, the provider informs the candidate about the training plan and the overall process for implementing the programme. Examples of the number of lessons of WBL for some programmes are listed in Table 8.

7.6 Pay and/or compensation (Criterion 5)

The costs of training under the CVET programme, if the candidate independently chooses to apply, are borne by the candidate. Training companies do not provide any payments or compensation for learners. If the CVET programme is implemented within the ALMP, candidates receive a payment or compensation in accordance with the regulations, as explained in Chapter 8. Disputes related to the organisation and implementation of training are resolved by the Education Inspectorate.

7.7 Social protection and work, health and safety conditions (Criteria 6 and 7)

The education provider who implements the training programme is obliged to take care of the learner's health and take all measures to prevent accidents, as taken for employees. During training on CVET programmes that are not part of the ALMP, candidates are not entitled to a pension or health insurance and do not receive allowances. The education provider may provide candidates with transportation, meals, healthcare booklets, etc.

7.8 Regulatory framework (Criterion 8)

The Law on Adult Education provides that CVET programmes with a WBL component can be completed at the employer or at another provider that meets the prescribed conditions³⁹. The Law on National Vocational Qualifications and the corresponding rulebooks, as well as the methodology established by the NEC and QC, define the procedures and responsibilities in the implementation of CVET programmes.

7.9 Involvement of social partners (Criterion 9)

Social partners are systematically involved in preparing the content of occupational standards, qualifications and CVET programmes. Employers' associations and a representative trade union (depending on the sector to which the qualification belongs) are members of sectoral committees, in accordance with the Law on the National Framework of Qualifications (MESI, 2010, Article 21), and they are included in the design of the CVET educational offer both in terms of scope and content.

³⁷ The examination catalogue includes: content to be tested – learning outcomes; the vocational qualification level; criteria for testing; credit points; profile and level of education of members of the committee, etc.

³⁸ Rulebook on training for assessors, Official Gazette of Montenegro, 56/10

³⁹ This may be a licensed education and training provider that meets the conditions prescribed by the specific CVET programme.

7.10 Support for companies (Criterion 10)

Adults who make a choice to attend a CVET programme at an adult education and training provider pay the fees themselves.

The budget of the VET Centre allocates funds for the preparation of CVET programmes and the promotion of lifelong learning. The funds for training assessors to acquire vocational qualifications are allocated in the Examination Centre's budget. The costs of organising examinations are borne by participants.

7.11 Flexible pathways and mobility (Criterion 11)

The Law on Recognition of Foreign Educational Credentials and Qualification Equivalence (MESI, 2016b) regulates the procedure for the recognition of a foreign educational document (certificate). Recognition of foreign certificates that confirm non-formal and informal learning is issued by the relevant licenced education provider or by the VET Centre if there is no licensed education provider for a particular certificate (MESI, 2016a). With the support of the National Euroguidance Centre, a 'Guide for the recognition of foreign educational documents' was prepared (MESI, 2019a).

The regulations in the field of education and qualifications provide that qualifications are based on learning outcomes, and that learning outcomes are grouped into qualification units that have a credit value and are transferable. Qualification units are related to jobs or a group of jobs in the occupational standard.

7.12 Career guidance and awareness raising (Criterion 12)

The VET Centre⁴⁰, with the support of the MESI, implements activities to inform young people and adults about CVET programmes on offer that lead to a vocational qualification and raises awareness of the importance of lifelong learning through adult education and learning days⁴¹, the EPALE platform⁴², and participation in workshops and conferences with the theme of lifelong learning organised by ministries, employers' associations⁴³, the EAM and other partners. The EAM plays a significant role in informing and advising different target groups (unemployed young people and adults, less employable persons, vulnerable groups) about the educational CVET programme offer⁴⁴.

7.13 Transparency (Criterion 13)

On the National Qualifications Framework⁴⁵ website, there is a list of all the qualifications that can be obtained by completing IVET and CVET programmes, adopted by the QC. On the MESI website there is data on the number of candidates who have completed training in various CVET programmes, updated by the licensed providers. The content of CVET programmes can be found in the 'Official Gazette of Montenegro'. The Examination Centre publishes invitations for training examiners in the process of obtaining a national vocational qualification on its website.

The 'Guide to the system of non-formal learning in Montenegro' (VET Centre, 2017) contains data on the licensed education providers that offer CVET programmes. A licensed education provider for adults publishes the educational offer, the duration of individual courses and the enrolment terms on its bulletin boards or websites. The content of CVET programmes is rarely published. During enrolment, candidates are informed of the procedure and method of conducting achievement checks during the programme and the examination. Consolidated information in electronic format on the

⁴⁰ VET Centre: <https://www.gov.me/cso/obrazovanje-odraslih-i-cjelozivotno-ucenje>

⁴¹ Adult education and learning days, information available on the Government of Montenegro portal: <https://www.gov.me/clanak/manifestacija-xxii-dani-obrazovanja-i-ucenja-odraslih-od-2-do-31-oktobra-2023-godine>

⁴² EPALE Platform: <https://epale.ec.europa.eu/me>

⁴³ For example, by the CEM: <https://komora.me/saopštenja/esf-za-vjestine-buducnosti>

⁴⁴ For example, by the Employment Agency of Montenegro: <https://www.zzzcg.me/profesionalna-orientacija/>

⁴⁵ Montenegrin Qualifications Framework website, available at: <http://cko.edu.me/ckoview/Default.aspx>

educational offer of CVET programmes by all licensed providers, which could be accessed by all interested candidates, is not available. The databases on licensed providers' educational offer are not connected to the VET Centre and NQF databases.

7.14 Quality assurance and tracking of apprentices (Criterion 14)

The VET Centre, in accordance with the regulations (MESI, 2020, MESI, 2021c), performs an external assessment of the quality of licensed adult education providers at least once every four years. Providers must conduct a self-evaluation once a year for certain areas, and every two years for all areas. The implementation of self-evaluation is monitored by the VET Centre. Providers must keep participant records for one year after the end of the programme. However, implementation of the self-evaluation process among providers implementing CVET programmes is in its initial phase. In order to support providers, the National Euroguidance Centre has prepared the 'Manual for self-evaluation of institutions for adult education' (VET Centre, 2020). A system of graduate tracking has not been established.

7.15 Conclusions

Strengths

- The contract between a licensed education and training provider and a learner defines the rights and obligations of both parties. (Criterion 1)
- Procedures for the development of qualifications and CVET programmes have been established at national level and they are in use. The qualifications that are developed in accordance with this procedure are part of the NQF. Learning outcomes in all CVET programmes leading to a vocational qualification are defined within the qualification standard and are linked to jobs in the occupational standard. (Criterion 2)
- CVET programmes for vocational qualifications specify the conditions for in-company trainers. In the process of licensing education and training providers (including companies that are licensed to implement CVET programmes) it is determined whether they meet the requirements in terms of in-company trainers' profile and level of education, as well as andragogic qualifications. In-company trainers at licensed providers have the opportunity for professional development by participating in training programmes which are accredited by the NEC. (Criterion 3)
- The offer of CVET programmes is broad, and includes programmes for obtaining vocational qualifications with a significant share of WBL. The training plan, the duration of the CVET programme, and the number of theory and WBL lessons are specified in the programmes for each of the qualifications. A significant number of adult education providers have a licence to implement these programmes. (Criterion 4)
- The education and training provider is obliged to look after the learner's health and take all measures to prevent accidents, as taken for employees. (Criterion 7)
- The legislative framework to support lifelong learning and the preparation and implementation of CVET programmes exists. (Criterion 8)
- Social partners are systematically involved in preparing the content of occupational standards, qualifications and CVET programmes, which are developed in constant cooperation with employers, employers' associations and other partners interested in improving the educational offer. The programmes reflect the needs of the labour market and contain a WBL component. (Criterion 9)
- Learning outcomes are grouped into qualification units that have a credit value and are transferable between programmes. (Criterion 11)

- In the process of implementing CVET programmes and assessing the acquisition of vocational qualifications, external evaluation mechanisms are carried out by the VET Centre every four years. Efforts are being made to support the development of education and training providers' capacity to implement self-evaluation mechanism. (Criterion 14)

Challenges, gaps

- The professional development of in-company trainers depends not only on their own interests but also on the support of the licenced providers that employ trainers and their investment in the professional development of their employees. Apart from the support for the acquisition of andragogic knowledge, there is no other system support for in-company trainers implementing CVET programmes. (Criterion 3)
- No payment or compensation is provided by training companies for learners. (Criterion 5)
- Learners are not entitled to a pension or health insurance. (Criterion 6)
- Data collection mechanisms need to be improved to create conditions for evidence-based policymaking. The implementation of the self-evaluation process by education and training providers implementing the CVET programmes is in its initial phase. There is no system of graduate tracking in place. (Criterion 14)

8. WORK-BASED LEARNING IN ACTIVE LABOUR MARKET POLICIES

8.1 Types of programmes with a work-based learning component

Active employment policy measures are determined by the National Employment Strategy 2021-2025 (MED, 2021), which must be adopted in accordance with the Law on Employment Mediation and Rights During Unemployment (MLSW, 2019). The institution responsible for the implementation of active employment policies is the EAM. In accordance with its work programme for 2023 (EAM, 2023), the EAM implemented six active policy measures. The ALMP measure that has a WBL component is 'Education and training of adults' which contains three programmes, as shown in Table 9.

Table 9: Programmes within the active policy measure 'Education and training of adults'

Measure	Programmes
Education and training of adults	1. Education and training
	2. Training for working with an employer
	3. Training for independent work

Source: Prepared by the author based on the EAM work programme for 2023

Programme 1: Education and training

Through the 'Education and training' programme, vocational qualifications⁴⁶ are acquired in accordance with adult education programmes (CVET programmes), accredited by NEC. All of the programmes contain a WBL component (explained in Chapter 7). The EAM's annual work plan determines the amount of funds for this programme, qualifications for which funds will be provided and the number of candidates. EAM publishes a call so that interested persons can be informed and apply for training. According to EAM data, within the ALMP 'Education and training' programme, 227 candidates were included in programmes for acquiring vocational qualifications in 2023 (EAM, 2024c) (see Table 10) (321 unemployed persons are expected to be included in 2024) (EAM, 2024d).

Table 10: Programmes for ALMP vocational qualifications (2023)

Programme for vocational qualification	Number of candidates
Accounting technician programme	93
Property and personal security guard programme	28
Teaching assistant programme	27
Construction machine operator programme – excavator and construction machine operator loader	20
Administrative technician programme	14
Programme chef of simple gastronomic products	11
Caregivers programme	10
Tourist guide programme	10

⁴⁶ The ALMP 'Education and training' programme, in addition to training for obtaining vocational qualifications, includes training on key skills. However, it does not contain a WBL component and is therefore not included in this report.

Programme for vocational qualification	Number of candidates
Caregivers organiser programme	8
Waiter programme	4
Assistant kitchen worker programme	2
In total	227

Source: Prepared by the author based on the EAM Work Report for 2023

Programme 2: Training for working with an employer

‘Training for working with an employer’ is implemented for unemployed persons without any work experience, whose lack of practical skills has been identified as an obstacle to their employment. The employer prepares the training programme, which consists entirely of WBL without any theory. With the support of mentors, candidates are trained for specific work in the profession. The duration of on-the-job training is usually six months. Table 11 shows the number of participants per group in 2023 (416 unemployed persons are expected to be included in 2024) (EAM, 2024d).

Table 11: Number of participants per group in 2023, ‘Training for working with an employer’ programme

Group of participants	Number of participants / %
Long-term unemployed persons	159 / 57.82%
Women	150 / 54.5%
Young people	99 / 36%
Persons with disabilities	14 / 5.09%
Beneficiaries of family financial support	10 / 3.64%
Members of the RE population	4 / 1.45%
Total	275

Source: Prepared by the author based on the EAM Work Report for 2023

Programme 3: Training for independent work

‘Training for independent work’ aims to provide the unemployed participants, who are less than 30 years old and who lack practical skills in a certain level of education, an opportunity to train for independent work at that level of education. The programme is based on the stated needs of employers to employ the unemployed persons without work experience in education levels III and IV to acquire practical skills for independent performance of work at their level of education (cook, baker, welder, waiter, plumber, etc.) The provider of the programme is an employer, from the private or public sector, which has adequate conditions necessary for the implementation of the programme. The training programme is determined by the employer, and is correlated with the group of jobs within the occupation for a given workplace. The programme consists entirely of WBL, without any theory part. Table 12 shows the number of participants per group in 2023 (207 unemployed persons are planned to be included in 2024) (EAM, 2024d).

Table 12: Number of participants per group in 2023, programme ‘Training for independent work’

Group of participants	Number of participants / %
Long-term unemployed persons	89 / 34.77%
Women and young people	152 / 59.38%
Persons with disabilities	5 / 1.95%
Beneficiaries of family financial support	4 / 1.56%
Members of the RE population	1 / 0.39%
Total	251

Source: Prepared by the author based on EAM Work Report for 2023

Based on EAM data⁴⁷, it can be concluded that young people are more interested in participating in programmes for obtaining practical skills than in programmes for obtaining a vocational qualification. Unemployed candidates are also more interested in joining administrative programmes than programmes for production occupations (electrical engineering, construction, agriculture) that are recognised as being in short supply in the labour market.

The analysis below was guided by the criteria of the European Quality Framework for Traineeships.

8.2 Conclusion of a written traineeship agreement (Criteria 2 and 3)

All programmes implemented by the EAM within the ALMP measure ‘Education and training of adults’ are implemented through a public call for interested employers which, as providers of education, want to conduct training for their needs. The procedure for selecting the education and training programme contractor is carried out by the EAM.

For all three programmes within the ‘Education and training of adults’ measure, the mutual rights, obligations and responsibilities of the EAM and the employer (provider of the programme) are governed by a written contract. The contract defines the rights and obligations of the EAM and the provider, which include the number of candidates included in the programme, the duration of the programme, the conditions for implementing the programme, and the amount of compensation that the employer receives from the EAM for candidate training.

Learners on the ‘Education and training’ programme do not sign a written contract with the employer and do not establish an employment relationship. However, a contract is signed between the learner and the EAM (about inclusion in a vocational qualification programme). This defines mutual rights and obligations, including the amount of compensation that the learner receives during the training.

Learners who are included in the ‘Training for working with the employer’ and the ‘Training for independent work’ programmes sign written employment contracts for nine months, with the salary being provided by the EAM for six months, and by the employer for three months where the candidate is trained.

⁴⁷ The data in Chapter 8 is taken from the report on the work of the EAM in 2023 (EAM, 2024c)

8.3 Learning and training objectives (Criteria 4 and 5)

The 'Education and training' programme enables unemployed participants to increase their employability. The programme by which the training is implemented is accredited by the NEC. These are CVET programmes for vocational qualifications, based on occupational and qualification standards, with learning objectives.

The 'Training for working with the employer' programme is implemented for unemployed participants without any work experience. The training programme is prepared by the employer, and the learning outcomes are related to jobs at the employer for a specific occupation. In accordance with the regulations, these programmes do not need to be approved by the NEC.

The 'Training for independent work' programme is implemented for unemployed participants without any practical experience in a certain field and level of education. The training programme is prepared by the employer, and learning outcomes correspond to the candidate's missing practical skills. In accordance with the regulations, these programmes do not need to be approved by the NEC.

8.4 Working conditions applicable to trainees (Criteria 6, 7 and 8)

Participants on the 'Education and training' programme have health insurance as unemployed persons, but are not entitled to any holidays because they do not have an employment contract. During the training, the employer provides the participants with protective equipment.

Participants in the 'Training for working with the employer' and the 'Training for independent work' programmes sign employment contracts with the employer, and they have pension and health insurance as well as the right to take holidays. The employer provides participants with protective equipment.

8.5 Rights and obligations (Criterion 9)

The rights and obligations of the participants in the measure 'Education and training of adults', related to a WBL component, are prescribed in the Law on Employment and Unemployment Insurance (MED, 2016) and in the Law on Adult Education (MESI, 2017). The participant has the right to have the training provider or employer adapt the training process, progression and method of assessment of knowledge and skills to their specific needs, that is, the capabilities of the participant, according to andragogical principles and in accordance with the education and training programme.

8.6 Reasonable duration (Criteria 10, 11 and 12)

The duration of the programme depends on the type – for the 'Education and training' programme it is from one to six months (three months on average), i.e. a maximum of 1 120 hours, and for the 'Training for working with the employer' and the 'Training for independent work' programmes it is six months, i.e. 1 120 hours. The duration of the programme depends on the complexity and volume of jobs and tasks within the occupation for which the programme is prepared.

8.7 Proper recognition of traineeships (Criterion 13)

In the case of the 'Education and training' programme, where education and training is carried out according to accredited programmes and in accordance with the procedures defined by the Law on National Vocational Qualifications, the candidate, following an assessment, receives a national vocational qualification certificate. Certificates of completion of other ALMP programmes issued by the employer may be recognised by another employer, but it is up to the employer to decide.

8.8 Transparency requirements (Criteria 14 and 15)

All programmes within the framework of ALMP are organised and implemented by the EAM. Activities taking place as part of the ALMP measures are regulated by the Law on Employment Mediation and Rights During Unemployment (MLSW, 2019). Public invitations to the unemployed, training providers and employers with precisely defined conditions are published on the EAM's website and in the press, as well as in the reports on the EAM's work. The results of public calls are also published.

The EAM website⁴⁸ contains a detailed overview of job vacancies and training that the Agency organises for different target groups. The EAM publishes public calls (organised by the EAM) for licensed education providers who want to implement various CVET programmes as part of ALMP.

8.9 Cross-border traineeships (Criteria 16 and 17)

The EAM competed on the Montenegro-Albania cross-border project together with the NGO 'World Vision' from Shkodra as the lead applicant, and the employment agency from Tirana as a partner in the project. The projects submitted are currently being evaluated. No other data is available.

8.10 Use of European Structural and Investment Funds (Criterion 18)

The EAM participates in European Union programmes, with a view to improving the EAM's capacity to implement the activities under its remit. For example, the Department for International Mediation and EURES was formed at the EAM. In 2022, the European Commission approved the financing of the TWINNING project MN 29 IPA SO01 22 'Strengthening the capacity of the EAM for implementation of active measures for employment, future participation in the European Social Fund (ESF) and support in labour mobility' (EAM, 2024c). In order to empower young people and strengthen the support measures aimed at reducing unemployment and inactivity, the Government adopted the implementation plan for the 'Youth Guarantee' (MLSW, 2024). The goals of the 'Youth Guarantee' programme include increasing employability, improving the relevance of education and training and providing quality-assured apprenticeships and traineeships to prepare young people for the labour market.

8.11 Applying the quality framework for traineeships (Criteria 19, 20, 21 and 22)

The VET Centre conducts an external evaluation every four years of all providers with a MESI licence, including the implementation of CVET programmes that lead to vocational qualifications within the ALMP 'Education and training' programme. These providers, supported by the VET Centre, are obliged to carry out a self-evaluation. However, implementation of this is only in its initial phase.

The EAM, in accordance with its procedures, monitors and evaluates the implementation of the 'Training for working with the employer' and the 'Training for independent work' programmes. (EAM, 2024c).

⁴⁸ Employment Agency of Montenegro website: <https://www.zzzcg.me/usluge/>

8.12 Conclusions

Strengths

- Learners included in the 'Training for working with the employer' and the 'Training for independent work' programmes have written employment contracts with the employer. Learners included in the 'Education and training' programme do not sign written contracts with the employer but they have written contracts with the EAM about inclusion in vocational qualification programmes. (Criterion 2)
- In the 'Education and training' programme, where CVET programmes for vocational qualifications accredited by NEC are used, learning objectives are given in these programmes. In the 'Training for working with the employer' and the 'Training for independent work' programmes, training programmes are prepared by the employer (they do not need to be approved by the NEC), and they include learning outcomes. (Criterion 4)
- Learners included in the 'Education and training' programme have health insurance as unemployed persons, but without holiday entitlements because they do not have employment contracts. Learners included in the 'Training for working with the employer' and the 'Training for independent work' programmes have employment contracts, and they have pension and health insurance as well as holiday entitlements. All contracts define the rights and obligations of the parties, including the amount of compensation that the learner receives during the training. (Criterion 3, 7 and 8)
- Mutual rights and obligations are defined in the 'Education and training' programme – in the contracts signed between the EAM and the employer as well as the between the EAM and the learner, in the 'Training for working with the employer' and the 'Training for independent work' programmes – in the contracts signed between the EAM and the employer as well as between learners and the employer. (Criterion 9)
- The programmes have a reasonable duration: 'Education and training' – from one to six months, 'Training for working with the employer' – six months, 'Training for independent work' – six months. (Criterion 10)
- Processes for appraising knowledge, skills and competences acquired in the 'Education and training programme' are in place. Employers are involved in the assessment of learners. The assessment leads to a recognised vocational qualification and learners receive the vocational qualification certificate. (Criterion 13)
- The EAM website contains a detailed overview of job vacancies and training that the Agency organises for different target groups. The EAM publishes public calls (organised by the EAM) for licensed education providers who want to implement various CVET programmes as part of ALMP. The results of public calls are also published. (Criterion 15)

Challenges / gaps

- Assessments of learners included in the 'Training for working with an employer' and the 'Training for independent work' programmes do not lead to a formal or vocational qualification. Learners receive a certificate of completion. (Criterion 13)

Lastly, there are other strengths and challenges to be mentioned, not strictly connected to any of the quality framework for traineeships criteria.

On a positive note, the VET Centre conducts an external evaluation every four years of all licenced education and training providers, including those that deliver CVET programmes under ALMP. In addition, the EAM is responsible for the implementation of ALMP and continuously audits ALMP measures in accordance with the internal audit annual work plans. The results are used to improve and ensure an efficient way of implementing and monitoring ALMP measures. Moreover, ALMP programmes are planned to be redesigned to enable greater access to employers from the private sector (with entrepreneurs, micro and small businesses being the priority), to provide adequate personnel with financial support, and to adjust programmes to employers' current needs and create conditions for more implementing the programmes more effectively.

However, one aspect that still needs to be improved is that the implementation of self-evaluation by education and training providers is only in its initial phase.

ANNEX 1: Details of interviewees

Interviewees	Organisation	Position	Date
Interviewee 1	Ministry of Education, Science and Innovation	Director General of the Directorate for International Cooperation, European Integration and EU Funds (acting)	16 April 2024
Interviewee 2	VET Centre	Head of Department for Quality and CPD	23 April 2024
Interviewee 3	Chamber of Economy	Head of Department for Education	24 May 2024

ANNEX 2: Quality criteria for apprenticeships, based on the European Framework for Quality and Effective Apprenticeships

Criteria for learning and working conditions

Written agreement

1. Before the start of the apprenticeship a written agreement should be concluded to define the rights and obligations of the apprentice, the employer, and where appropriate the vocational education and training institution, related to learning and working conditions.

Learning outcomes

2. The delivery of a set of comprehensive learning outcomes defined in accordance with national legislation should be agreed by the employers and vocational education and training institutions and, where appropriate, trade unions. This should ensure a balance between job-specific skills, knowledge and key competences for lifelong learning supporting both the personal development and lifelong career opportunities of the apprentices with a view to adapt to changing career patterns.

Pedagogical support

3. In-company trainers should be designated and tasked to cooperate closely with vocational education and training institutions and teachers to provide guidance to apprentices and to ensure mutual and regular feed-back. Teachers, trainers and mentors, specially in micro-, small and medium-sized companies, should be supported to update their skills, knowledge and competences in order to train apprentices according to the latest teaching and training methods and labour market needs.

Workplace component

4. A substantial part of the apprenticeship, meaning at least half of it, should be carried out in the workplace with, where possible, the opportunity to undertake a part of the workplace experience abroad. Taking into account the diversity of national schemes, the aim is to progress gradually towards that share of the apprenticeship being workplace learning.

Pay and/or compensation

5. Apprentices should be paid or otherwise compensated, in line with national or sectoral requirements or collective agreements where they exist, and taking into account arrangements on cost-sharing between employers and public authorities.

Social protection

6. Apprentices should be entitled to social protection, including necessary insurance in line with national legislation.

Work, health and safety conditions

7. The host workplace should comply with relevant rules and regulations on working conditions, in particular health and safety legislation.

Criteria for framework conditions

Regulatory framework

8. A clear and consistent regulatory framework should be in place based on a fair and equitable partnership approach, including a structured and transparent dialogue among all relevant stakeholders. This may include accreditation procedures for companies and workplaces that offer apprenticeships and/or other quality assurance measures.

Involvement of social partners

9. Social partners, including, where relevant, at sectoral level and/or intermediary bodies, should be involved in the design, governance and implementation of apprenticeship schemes, in line with national industrial relations systems and education and training practices.

Support for companies

10. Financial and/or non-financial support should be envisaged, particularly for micro-, small and medium-sized companies, enabling cost-effective apprenticeships for companies, taking into account, when appropriate, cost-sharing arrangements between employers and public authorities.

Flexible pathways and mobility

11. To facilitate access, entry requirements for apprenticeships should take into account relevant informal and non-formal learning and/or, if relevant, the accomplishment of preparatory programs. Qualifications acquired through apprenticeships should be included in nationally recognised qualification frameworks referenced to the European Qualifications Framework. Apprenticeships should allow access to other learning opportunities, including at higher education and training levels, career pathways and/or, where relevant, the accumulation of units of learning outcomes. Transnational mobility of apprentices, either at the workplace or education and training institutions, should be progressively promoted as a component of apprenticeship qualifications.

Career guidance and awareness raising

12. Career guidance, mentoring and learner support should be provided before and during the apprenticeship to ensure successful outcomes, to prevent and reduce drop-outs as well as support those learners to reengage into relevant education and training pathways. Apprenticeships should be promoted as an attractive learning pathway through widely targeted awareness-raising activities.

Transparency

13. The transparency of, and access to apprenticeship offers within and between Member States should be ensured, including with the support of public and private employment services as well as other relevant bodies, and, when appropriate, by using Union tools such as EURES as provided for in the EURES regulation.

Quality assurance and tracking of apprentices

14. Quality assurance approaches should be in place taking into account the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET), including a process allowing a valid and reliable assessment of the learning outcomes. The tracking of employment and career progression of the apprentices should be pursued, in accordance with national and European legislation on data protection.

ANNEX 3: Quality criteria for traineeships, based on the European Quality Framework for Traineeships

1. Improve the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work by putting in practice the following principles for a Quality Framework for Traineeships:

Conclusion of a written traineeship agreement

2. Require that traineeships are based on a written agreement concluded at the beginning of the traineeship between the trainee and the traineeship provider;
3. Require that traineeship agreements indicate the educational objectives, the working conditions, whether an allowance or compensation is provided to the trainee by the traineeship provider, and the rights and obligations of the parties under applicable EU and national law, as well as the duration of the traineeship, as referred to in recommendations 4-12;

Learning and training objectives

4. Promote best practices as regards learning and training objectives in order to help trainees acquire practical experience and relevant skills; the tasks assigned to the trainee should enable these objectives to be attained;
5. Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, monitoring and assessing his/her progress;

Working conditions applicable to trainees

6. Ensure that the rights and working conditions of trainees under applicable EU and national law, including limits to maximum weekly working time, minimum daily and weekly rest periods and, where applicable, minimum holiday entitlements, are respected;
7. Encourage traineeship providers to clarify whether they provide coverage in terms of health and accident insurance as well as sick leave;
8. Require that the traineeship agreement clarifies whether an allowance or compensation is applicable, and if applicable, its amount;

Rights and obligations

9. Encourage the concerned parties to ensure that the traineeship agreement lays down the rights and obligations of the trainee and the traineeship provider, including, where relevant, the traineeship provider's policies on confidentiality and the ownership of intellectual property rights;

Reasonable duration

10. Ensure a reasonable duration of traineeships that, in principle, does not exceed six months, except in cases where a longer duration is justified, taking into account national practices;
11. Clarify the circumstances and conditions under which a traineeship may be extended or renewed after the initial traineeship agreement expired;
12. Encourage the practice of specifying in the traineeship agreement that either the trainee or the traineeship provider may terminate it by written communication, providing advance notice of an appropriate duration in view of the length of the traineeship and relevant national practice;

Proper recognition of traineeships

13. Promote the recognition and validation of the knowledge, skills and competences acquired during traineeships and encourage traineeship providers to attest them, on the basis of an assessment, through a certificate;

Transparency requirements

14. Encourage traineeship providers to include in their vacancy notices and advertisements information on the terms and conditions of the traineeship, in particular on whether an allowance and/or compensation and health and accident insurance are applicable; encourage traineeship providers to give information on recruitment policies, including the share of trainees recruited in recent years;
15. Encourage employment services and other providers of career guidance, if providing information on traineeships, to apply transparency requirements;

Cross-border traineeships

16. Facilitate the cross-border mobility of trainees in the European Union inter alia, by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities;
17. Examine the possibility to make use of the extended EURES network and to exchange information on paid traineeships through the EURES portal;

Use of European Structural and Investment Funds

18. Make use of the European Structural and Investment Funds, namely the European Social Fund and the European Regional Development Fund, in the programming period 2014-2020, and the Youth Employment Initiative, where applicable, for increasing the number and quality of traineeships, including through effective partnerships with all relevant stakeholders;

Applying the Quality Framework for Traineeships

19. Take appropriate measures to apply the Quality Framework for Traineeships as soon as possible;
20. Provide information to the Commission by the end of 2015 on the measures taken in accordance with this Recommendation;
21. Promote the active involvement of social partners in applying the Quality Framework for Traineeships;
22. Promote the active involvement of employment services, educational institutions and training providers in applying the Quality Framework for Traineeships.

ACRONYMS

AE	Adult education
ALMP	Active labour market policies
BES	Bureau for Educational Services
CGC	Career guidance and counselling
CIPS	Centre for providing information and professional counselling
CEM	Chamber of Economy of Montenegro
CVET	Continuing Vocational Education and Training
EQAVET	European Quality Assurance Reference Framework for Vocational Education and Training
EPALE	Electronic Platform for Adult Learning in Europe
ETF	European Training Foundation
EU	European Union
EAM	Employment Agency of Montenegro
EFM	Employers Federation of Montenegro
ILO	International Labour Organization
IVET	Initial vocational education and training
MED	Ministry of Economic Development
MEIS	Montenegro Education Information System
MESI	Ministry of Education, Science and Innovation
MLSW	Ministry of Labour and Social Welfare
NEC	National Education Council
NQF	National qualifications framework

OeAD	Austria's Agency for Education and Internationalisation
PISA	Programme for International Student Assessment
QC	Qualifications Council
TU	Trade union
UNICEF	United Nations International Children's Emergency Fund
VET	Vocational education and training
VET Centre	Centre for vocational education and training
WBL	Work-based learning

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