

INVENTORY ON THE VALIDATION OF NON-FORMAL AND INFORMAL LEARNING

Country report 2023 Montenegro

Disclaimer

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1 Introduction

The validation of non-formal and informal learning (VNFIL) system in Montenegro has reached the operational stage, though full implementation is still to be achieved. VNFIL is most developed in vocational education and training (VET). The national legislation framework against which VNFIL takes place has not changed significantly since the 2018 VNFIL Inventory for Montenegro (Dimovska, 2019). There is an overarching legal framework in place. Secondary legislation specifying the implementation arrangements and funding is yet to be developed.

A legal framework for VNFIL in Montenegro is in place for vocational qualifications at Montenegrin Qualifications Framework (MQF) levels 1–5. The MQF Act (2010), the National Vocational Qualifications Act (2008, amended in 2016), and the Adult Education Act (AE) (2011, amended in 2017) set the procedures for VNFIL. Higher Education Institutions (HEIs) can carry out assessments and award vocational qualifications at MQF levels 6–8 for their special training programmes accredited by the Higher Education Council, in accordance with the Higher Education Institution Act. (ETF, 2021)

Significant improvements have been made since 2018 in terms of transferability of qualifications and modules and flexibility of learning pathways. All national strategic and planning documents in education, employment and digitalisation issued since then fully recognise the importance of VNFIL.

The MQF register is active and growing. It includes three types of qualifications: education qualifications from all formal education sectors; general education (GE), VET and higher education (HE), national vocational qualifications (NVQs)¹ and additional qualifications². In line with the MQF Act, all qualifications are based on learning outcomes. Qualification standards include credit values and mandatory and optional modules, as well as criteria for assessing learning outcomes and assessment methods (ETF, 2021). Montenegro has made significant progress in bringing in flexible learning pathways and made it easier to move to different courses or course settings.

VNFIL is currently possible as a direct assessment of knowledge, skills and competency. Other forms of VNFIL phases are not systematically available. Assessments are carried out by the licensed AE providers of approved/accredited courses. The Examination Centre, which is a state-sector body, trains and licenses the assessors³. The certificates they issue are directly linked to the MQF and confer transferable credits. All other VNFIL methods are on a case-by-case basis and sporadic.

The Employment Agency of Montenegro implements active labour market policies (ALMPs) for different target groups in cooperation with the licensed education providers (that issue MQF-linked, credit-carrying, recognised and transferable certificates, which can include VNFIL), and in cooperation with the employers (that issue other types of certificates). The third sector is not involved in VNFIL.

The Ministry of Education is responsible for overall coordination, monitoring and quality assurance (QA) of the validation process. Other key bodies are the National Council for Education, VET Centre, licensed AE providers, HEIs, Ministry of Labour and Social Welfare and Qualification Council.

The practice of VNFIL is still in an early development phase. It would be helpful to develop secondary legislation and guidance documents on the VNFIL procedures and methods to be able to implement practical arrangements efficiently. Targeted efforts are needed on information, advice and guidance for

¹ As specified in the NVQ Act, Art. 2, a vocational qualification is a vocational or professional qualification necessary for performing an occupation or specific tasks within an occupation that is based on a qualification standard and an occupation standard.

² Educational qualifications are attained upon completion of a formal education programme and represent attainment of a level in education. NVQs are based on the occupation standards; they can be acquired through assessment after completing formally recognised training — either part of a formal education programme, such as a module or course, or an adult education or special training course in higher education — or through VNFIL. Additional qualifications are other qualifications that are acquired outside of a programme leading to an educational or vocational qualification. They supplement a person's qualification level and testify to additional knowledge, skills and competence being acquired. They may be a prerequisite for working in a specific area of work. (ETF, 2021, p. 7)

³ <https://iccg.co.me/>, the Examination Centre was founded by the Government of Montenegro in 2005.

the existing initiatives and to support full VNFIL implementation once the regulative framework is in place.

2 National perspective

2.1. Overarching approach to validation

The national legislation that regulates VNFIL has not changed since the 2018 VNFIL Inventory. An overall legal framework is in place. The VNFIL system in Montenegro is still at an early stage of development, especially with regards to its implementation, with VET being the most developed sector. Secondary legislation to fully specify implementation arrangements funding is yet to be developed.

Significant improvements have been made in transferability of qualifications and modules, flexibility in learning pathways and inclusion of the concept of VNFIL in all newly published national strategic and planning documents in education, employment and digitalisation.

According to the documents mentioned throughout this chapter, VNFIL is seen as advantageous for economic development and ALMPs. The policy and legislation emphasise overcoming workforce skills shortages, demand-and-supply skill gaps especially in the fields of IT and green skills and other key economic challenges. To reach these goals, access to information and accessibility for less qualified members of the workforce are seen as key.

National legislation/policy framework

As reported in the 2018 VNFIL Inventory, the legal framework to bring in VNFIL for vocational qualifications at MQF levels 1–5. VNFIL is the MQF Act (2010)⁴, the NVQ Acts (2008, amended in 2016)⁵, the Adult Education Act (2011, amended in 2017)⁶. The VET Act (2010)⁷ is another key document. HEIs are allowed to carry out assessments and award vocational qualifications at MQF levels 6–8 for special training programmes accredited by the Higher Education Council, in accordance with the HEI Act. (ETF, 2021). The key elements within that are relevant to VNFIL are:

- The NVQ Act states that NVQs up to the HE level can be acquired by:
 - completing a module, when the official course consists of more than one occupation standard;
 - assessment of knowledge, skills and competence upon completion of the AE course, in line with the examinations catalogue.
- The Adult Education Act (2017) defines AE as education acquired through non-formal, informal and self-directed means and defines AE programmes qualification, retraining, specialisation and other courses. Vocational qualifications in HE can be earned by assessment of knowledge, skills and competence based on a specific specialisation programme in accordance with the HEI Act.

The MQF was adopted in 2010 and was in 2017 aligned with and now self-certifies against the Qualifications Framework for the European Higher Education Area (QF-EHEA)⁸. The MQF has reached an operational stage, with significant improvements in the national qualifications database since the 2018 VNFIL Inventory.

As reported by ETF (ETF, 2021) and Cedefop⁹, several recent developments provide a good basis for the future work on VNFIL in Montenegro, and these include: the principles underlying the MQF, particularly the shift to learning outcomes, modular design of VET qualifications, well-established provision for development of professional competence, licensing of staff involved in the assessment of NVQs and work to expand the network of licenced AE providers.

⁴ Ministry of Education of Montenegro, 2010.

⁵ Ministry of Education of Montenegro, 2008 and 2016

⁶ Ministry of Education of Montenegro, 2011 and 2017

⁷ Ministry of Education of Montenegro, 2010

⁸ Ministry of Education of Montenegro, 2014

⁹ <https://www.cedefop.europa.eu/en/tools/nqfs-online-tool/overview>

Since the 2018 VNFIL Inventory, the documents on the process for the developing qualifications were adapted with support of the EU-funded Instrument for Pre-Accession Assistance (IPA) projects: 'VET Qualification Development in accordance with labour market needs 2020 – 2021', 'Integration of Key Competences into the Education System of Montenegro 2019 – 2021' and 'Improvement of Education Program and Services to Satisfy the Needs of Marginalised Groups 2019 – 2020'. With their support, improvements have been on transferability of qualifications and modules, with increased flexibility in learning pathways. The groundwork has been laid for validation or recognition of partial and full professional qualifications and modules.

The Rulebook¹⁰ defining the procedures for VNFIL in accordance with the revised¹¹ NVQ Act was adopted in 2019 as secondary legislation (ETF, 2021).

The Rulebook states that AE providers are responsible for providing spaces and the right technical conditions for the theoretical and practical parts of examinations. Exams/direct assessments are to be held within 15 to 30 days of completion of the AE course or submission of the request for direct assessment by the candidate. The assessment request is submitted by the candidate directly or via the AE provider. The assessment of knowledge, skills and competence is conducted by the assessment panel, which is convened by the AE provider. The assessment panel consists of licensed assessors from the official list for each of the qualifications. The list of assessors is compiled by the State Examination Office following an open call for interest procedure. A representative from the State Examination Office can attend the examination to follow the examination process. This Rulebook further specifies a number of the formal details of the process, such as the remit of the panel, secrecy around the examination questions and tasks, certification and other details.

Prior to this, in the second half of 2018, two other relevant Rulebooks were approved: the Rulebook on the form and contents of NVQ certificates¹² and the Rulebook on the Procedure of Issuing and Revoking NVQ Assessor Licences¹³.


¹⁰ Rulebook on the manner and procedure of assessment of knowledge, skills and competences in the process of acquiring vocational qualifications, Official Gazette of Montenegro, No 13/2019, <http://www.sluzbenilist.me/pregled-dokumenta-2/?id={36436B7D-E74B-4914-AA82-7C79E618E4D1}>

¹¹ Responsibility for the assessment of knowledge, skills and competences for vocational qualifications was transferred from the Examination Centre to AE providers licenced by the Ministry of Education by an Amendment to the NVQ Law in 2016.

¹² Rulebook on the form and contents of NVQ certificates

<https://www.skolskiportal.edu.me/Docs/Propisi/Forms/AllItems.aspx?FolderCTID=0x012000CB05A5DD4A417B41B14005F18ACD7349&RootFolder=http%3a%2f%2fwww%2eskolkiportal%2eedu%2eme%2fDocs%2fPropisi%2fPravilnici&SortField=Modified&SortDir=Asc&View=%7b44E62738%2dCE8F%2d47BF%2d9E7B%2dA486221D5129%7d>

¹³ Rulebook on the Procedure of Issuing and Revoking NVQ Assessor Licences <https://iccg.co.me/wp-content/uploads/2020/12/PRAVILNIK-O-BLIZEM-NACINU-I-POSTUPKU-IZDAVANJA-I-ODUZIMANJA-LICENCE-ZA-RAD-ISPITIVACA-U-POSTUPKU-STICANJA-NACIONALNE-STRUCNE-KVALIFIKACIJE1.pdf>, Official Gazette of Montenegro Nr. 80/08 and 40/16


Crna Gora

(Naziv organizatora obrazovanja odraslih)

Na osnovu člana 26 stav 1 Zakona o nacionalnim stručnim kvalifikacijama ("Službeni list CG", br. 80/08 i 40/16), organizator obrazovanja odraslih izdaje

**SERTIFIKAT
O STEČENOJ NACIONALNOJ STRUČNOJ KVALIFIKACIJI**

(Ime kandidata, ime roditelja i prezime)

(Datum, opština i država rođenja)

(Broj lične karte kandidata)

(Naziv nacionalne stručne kvalifikacije)

Broj sertifikata _____

MP

Mjesto i datum _____ **DIREKTOR** _____

Figure 1: Format of the NVQ Certificate. Source: Rulebook on the form and content of NVQ certificates

New strategic documents and action plans

The development of the strategic framework that is of relevance for the Montenegrin VNFIL system has progressed significantly since the 2018 VNFIL Inventory. New strategic documents and action plans recognise the importance of rates of AE and VNFIL for economic development and lifelong learning (LLL). Many of the strategies presented in the 2018 VNFIL Inventory have expired since (such as the National LLL and Career Orientation Strategy 2016 – 2020, Strategy for Development and Financing of HE, VET Strategy 2015 – 2020 and Strategy for General Secondary Education 2015 – 2020).

VET

The new VET Development Strategy (2020 – 2024), including the Action Plan for 2020 – 2021¹⁴, was adopted in 2021. It outlines the measures for overcoming the workforce skills shortages as one of the country's key economic challenges and seeks to improve the efficiency and the effectiveness of the VET sector and LLL. The Strategy is aligned with key policies and strategic documents, such as the EU Accession Programme, the EQF for LLL and all major VNFIL-related European developments and recommendations (such as the Torino process recommendations, the Riga conclusions and others).

Within this Strategy, measure 4.2.4 ('Enabling adults to obtain qualifications') focuses on VNFIL and outlines a transparent VNFIL process as well as efficient career guidance and advice services. The measure calls for an analysis of procedures and responsibilities at the institutions within this process to enable improvements if and where necessary. It goes on to stipulate that it should be possible to earn

¹⁴ Ministry of Education, 2020

different levels of the same qualification to make it more accessible for the less qualified and that relevant information should be easily available to both the employed and unemployed. The Strategy also recognises the need for continuity in strengthening the capacity of the VNFIL stakeholders, training VNFIL accessors, promoting LLL, career development, improving the range of courses including programmes for obtaining partial qualifications (modules) and better overall accessibility of the educational courses in Montenegro. The need to further examine the qualification procedures for different purposes and to adapt them to for AE is also stated, as is an improved QA system aligned with EQAVET.

The VET Strategy Action Plan for 2020 – 2021 does not include specific VNFIL measures. It contains a variety of measures that are indirectly supporting the further development of VNFIL (such as full modularisation of programmes, learning outcome-oriented education, building up sector profiles, developing labour market-relevant qualification standards, social partnerships, etc.).

Higher Education and Adult Education

The Higher Education Development Strategy of Montenegro 2021 – 2025¹⁵ identifies enabling VNFIL as one of the key challenges and recommendations for HE improvement in Montenegro. The Strategy recognises the importance of different learning pathways and validation of non-formal education in general. No specific VNFIL measures are laid out.

The University of Montenegro, being the oldest and the largest university in the country, adopted a new **Development Strategy 2019 – 2024** that includes LLL as one of its priorities, however with the focus remaining on formal LLL with its specialisation programmes (measure A_I.2.1). (University of Montenegro, 2019)

The Adult Education Action Plan 2019 – 2022¹⁶ included one VNFIL-related measure. The measure relies on the existing VNFIL mechanisms and aims to a) inform licenced AE providers of those mechanisms; b) increase the number of related activities, requests submitted and certificates issued. The Action Plan, aligning with the **Upskilling Pathways Recommendation**¹⁷, includes validation measures as the means to strengthening upskilling and adult learning policies in Montenegro. The Adult Education Plan for 2023-2026 is in development.

Other relevant strategic documents

The new **Education System Digitalisation Strategy 2022 – 2027** with the **Action Plan for 2022 and 2023**¹⁸ recognises non-formal education and LLL as integral parts of the education and training sector in the digital age, aligned with the Digital Transformation Strategy¹⁹. The number of people reached by promotional activities on non-formal ICT education is one of performance indicators of the Strategic goal 3 (from a baseline of zero to 600 persons in 2027). The measures include financing and organising related promotional activities.

VNFIL is mentioned among the priorities in the **Strategy for Lifelong Entrepreneurial Learning 2020 – 2024**, which was developed by the Ministry of Economy²⁰.

The new **National Employment Strategy 2021 – 2025**²¹ with Action Plan for 2021 and 2022 has four operational goals; its second goal is the creation of knowledge and competence for the labour market in the digital age in order to enhance productivity and develop human resources. Within this goal, among other measures, non-formal education is seen as the key method in bridging the gap between labour market demand and supply. IT and green skills are seen as the areas needing special support. One of the measures under this strategic goal (measure 2.3.) is to encourage access to and enrolments by

¹⁵ Ministry of Education of Montenegro, 2021

¹⁶ Ministry of Education of Montenegro, 2018

¹⁷ The Upskilling Pathways Recommendation aims to help adults acquire a minimum level of literacy, numeracy and digital skills and/or acquire a broader set of skills by progressing towards an upper secondary qualification or equivalent (level 3 or 4 in the European Qualifications Framework (EQF) depending on national circumstances): See <http://ec.europa.eu/social/main.jsp?catId=1224>

¹⁸ UNICEF, 2022

¹⁹ Ministry of Public Administration, Digital Society and Media of Montenegro, 2021

²⁰ Ministry of Economy of Montenegro, 2020

²¹ Ministry of Economic Development of Montenegro, 2021

adults in LLL and to have increasing numbers of people obtaining professional qualifications, with the aim to reach 7% in 2023 and 15% in 2025.²² Planned activities include promoting AE programmes related to occupations with a labour deficit and the main strategic economic development sectors, expanding and levelling up the network of licensed education providers, improving the effectiveness of AE programmes for the labour market, including local governments offices in skills and qualification analysis for their areas, and strengthening capacity in VNFIL. For these reasons, the VET Centre and the Ministry of Education are seen as the key stakeholders in this process.

The **Employment Action Plan for 2022**²³ in measure 2.3. maps out how to encourage access to and enrolments by adults in LLL and earmarks a budget of EUR 3 500 for AE promotion activities. Further measures include individual employment consultations and employment plans, career guidance, support in matching job seekers with employers, AE and training in different forms, and other active labour market measures that are relevant to VNFIL. These specific measures seek to include women and other marginalised groups. No specific VNFIL initiatives are included in this Action Plan.

The **Draft Economic Reform Programme 2021 – 2023**²⁴ includes considerations related to education, skills (section 5.3.6) and employment (section 5.3.7); however, it focuses on formal education and does not address validation issues specifically.

In the field of **migration**, the focus is currently put on recognition of foreign certificates. No evidence was found for VNFIL in this field in Montenegro.

There is no separate data related to **support for low-qualified individuals through VNFIL** or their participation in AE. Overall, Montenegro is lagging behind in relation to European LLL goals, with take up rates among adults increasing from 2.5% in 2019 to just 2.7% in 2020, according to Eurostat²⁵. The Employment Agency has a number of measures to support low-qualified jobseekers. These include non-formal education alternatives and are provided by licensed education providers and employers in line with labour market demand. There are also special measures for the target group of low-qualified Roma and Egyptian minorities.

Validation of non-formal and informal learning cannot be financed using an **individual learning account or similar financial schemes**, as these do not exist in Montenegro.

Main barriers

The Lack of a clear strategic commitment to VNFIL in the aforementioned policy documents, no systematic approach to the management of the VNFIL system and no clear regulations and promotion mechanisms are the main challenges of VNFIL in Montenegro. Access is especially difficult for the low-qualified and disadvantaged groups, but also the general population lacks information about the possibility and usefulness of validation. Advice and guidance options are very limited.

Cases related to the validation of knowledge and skills up to level 5 on the MQF in the areas that are currently not recognised by recognised education programmes in Montenegro are ruled upon separately by the VET Centre. The procedure for such validation is not described by a separate rulebook, nor are there pre-defined templates for the validation process based on a portfolio. As a result, related initiatives are very rare in practice, as most of the validation happens through a direct assessment procedure.

Financing for VNFIL is tied to specific, mostly state-funded projects and initiatives. If VNFIL is initiated by candidates, the fees are covered by the candidates themselves.

2.2. Validation in education and training

²² No baseline indicator in terms of percentage of the population is provided, but this included 997 persons in total in 2020 according to this document.

²³ Ministry of Economic Development of Montenegro, 2022

²⁴ Government of Montenegro, 2021

²⁵ https://ec.europa.eu/eurostat/databrowser/view/trng_ifse_03/default/table?lang=en

The Montenegrin VNFIL system is designed to enable validation in all sectors of education and training. It is possible to attain a vocational qualification (or part of it) by completing a specific module of the VET programme or through the VNFIL process. The qualification can be recognised so that a person may continue education in a formal setting — a formal VET programme (ETF, 2021). Sporadic cases (two certificates from 2019 to 2023) of adults obtaining certificates for primary education for adults courses have been identified. In other sectors, the progress is limited.

HEIs can carry out assessments and award vocational qualifications at MQF levels 6 – 8 for their special training programmes accredited by the Higher Education Council, in accordance with the Higher Education Institution Act. . HEIs, however, have a clear focus on formal education, and VNFIL is a rare exception.

The EVIVA ERASMUS+ Project

Enhancing and Validating service-related competences in versatile learning environments in the Western Balkan Universities (e-VIVA) Erasmus+ Project

The project ran from November 2018 to August 2022 and included two Montenegrin universities: the state-run University of Montenegro and the private University of Donja Gorica, Podgorica. It aimed to combine HE and professional practice in education for the service sector in order to contribute to improved transparency of the acquired skills by providing learning and validation opportunities. ITC-based methods of self-assessment and testing were used to assess knowledge, skills and attitudes using a specialised software called Level 5. Certificates were issued without European credits and not directly related to any MQF level.

Source: [e-viva — E-VIVA \(evivaproject.eu\)](http://www.evivaproject.eu)

<http://www.erasmusplus.ac.me/?projekat=enhancing-and-validating-service-related-competences-in-versatile-learning-environments-in-western-balkan-universities-2>

In education and training, VNFIL is **nationally coordinated by the Ministry of Education** and carried out by the licensed education providers in cooperation with other stakeholders such as the VET Centre, other formal education providers, Chambers of Commerce, Trade unions and employers. There are no separate VNFIL systems for each region or sector. In education and training-related validation, a number of other stakeholders are or may be involved in the process.

Outcomes that are possible after VNFIL in education and training are full formal or partial qualifications including the award of credits, modules, certificates attesting to qualifications obtained through the non-formal education (after a legislated exam). Qualifications are transferable. They can provide access to programmes in formal education and be recognised as a qualification necessary to perform a certain job.

Acquisition of any qualification is directly **linked to the MQF**. Learning acquired through non-formal and informal learning can be used to acquire MQF qualifications either as full qualifications, modules or partial qualifications. Modular education programmes carrying **credits** enable people to transfer to different courses and gives them enhanced employment prospects.

Education programmes can be **split into modules** based on the jobs they are training people for and in line with specific criteria, such as an occupational standard, an area of education, a vocational qualification, key competence or one or more key skills. If the modules of a formal and an AE programme are identical, they carry the same number of credits and are transferable, regardless of how many modules have been acquired.

Education programmes and modules can also be divided into **education units**, based on the similarity and connection between the parts of the programme or module. Each of the units carries the same

number of credits. Education units can be merged to make more modules or even whole education programmes.

The AE provider running a specific programme can, based on the attendee's previously ascertained knowledge and skills, release that person from the obligation to attend certain parts of that educational programme.

For example, a completed Entrepreneurship and business culture module can be transferred and used in gaining other qualifications and education programmes that contain it, without the need to repeat it or pass the assessment again. This is equally true for a module that a candidate has completed by following the relevant education programme as for the candidate who has obtained a certificate through validation.

Validation stages are not covered by specific legislation in Montenegro. There are no regulations or rulebooks about the validation process that would define its stages and the process, as such. The data collected about its use in AE do not contain information on validation stages.

The main **restriction** on the validation in education and training is the fact that the VNFIL system in Montenegro is still in the early stages and detailed procedures have not yet been developed. A further challenge is that validation of knowledge and skills that are not part of approved or accredited education programmes cannot occur, due to the fact that there can be no comparison of the learning outcomes that underpin the government-recognised certificate that would be issued.

Certificates gained through licensed AE providers are equal to certificates gained through traditional training when: a) certification has followed the legally specified procedure in which a licensed AE provider officially excuses the candidate from attending all or part of an education programme, b) the candidate requests a direct assessment of previously acquired knowledge and skills; and c) the candidate passes the direct assessment in a satisfactory manner in line with the examinations catalogue for that vocational qualification. In practice, two models are in use: recognition of foreign certificates and final assessment for obtaining a vocational qualification.

The **strength** of the current Montenegrin VNFIL system in the field of education and training lies in the fact that its framework is provided through the MQF and the related regulatory framework, making the qualifications transparent and transferable. The modularisation of educational programmes and AE programmes created good preconditions for validating professional qualifications and key skills fully and for validation of single modules / education units.

The major **weakness** is the fact that the VNFIL system of Montenegro is still being developed, with procedures and guidelines yet to be developed. Furthermore, awareness about the VNFIL in society is low and the providers lack the methods and the capacity (both in terms of know-how and personnel) to conduct VNFIL.

2.3. Validation in the labour market

Based on the needs it identifies in the labour market and the number of registered jobseekers, the Employment Agency initiates and implements active labour market measures in cooperation with its partners, principally the licensed education providers and companies, within the budget available to it. The Employment Agency promotes AE and non-formal learning in different fields. The importance of AE and validation as well as the challenges in this area are clearly recognised by the new Employment Strategy 2021 – 2025 (Ministry of Economy, 2021).

Different certificates are issued within this process for different kinds of training initiatives.

MQF-aligned government-recognised vocational qualification certificates or key skills certificates are issued upon completion of AE training that the Employment Agency runs in cooperation with the licensed AE providers under National Education Council-approved programmes. Such AE programmes are based on the recognised standards that, when met, lead to vocational qualification or key competence certificates. They can be obtained through direct assessment in line with regulations on the matter.

Qualification programme of the Employment Agency

Protection specialists for persons and property

In 2022, the Employment Agency ran a training course for adults to obtain a vocational qualification for the profession called 'specialist in the protection of persons and assets'. The training was organised in cooperation with the licensed AE provider PU Urban Protection Training Centre, Montenegro in 2022. Thirty attendees from across Montenegro (eleven in the capital of Podgorica, eleven in Budva and eight in Bijelo Polje) participated in the programme. Twenty-five participants successfully completed the training course and obtained a vocational qualification certificate, of whom twelve have already found a job in the respective sector as of January 2023. The Agency expects that further attendees will be employed in the near future.

Source: zzzcg.me

For other forms of training, certificates are issued by the training providers and are recognised by the labour market, but not officially validated.

The AE Act, Article 18, stipulates that the employer can, for its own needs, when adjusting to the labour market changes and demands as well as to new technological and work processes, organise different forms of training and specialisation for its employees. In these cases, the employer issues certificates to the employees for the training they have completed and the specialisation they have acquired.

The Employment Agency implements job-specific training programmes in cooperation with employers in which candidates learn skills needed for specific workplaces. These training courses are conducted using the operational training plans for a specific workplace that are prepared by the employers who themselves conduct the training. Candidates who successfully complete such programmes obtain certificates confirming their ability to perform tasks needed at that specific workplace. Those certificates are not valid towards any official qualification, but they are recognised by employers and, as such, increase the employability of the successful candidates.

To enable them to gain work experience, the Agency works in cooperation with employers to implement programmes whereby candidates work self-employed. Within this programme, candidates are equipped with knowledge, skills, and work experience and they acquire the competence needed for freelance work at their level of education. Also, this programme is implemented using the employers' operational plans. Completed training courses lead to certificates confirming work experience, that are recognised as an actual internship when applying for a professional exam for certain professions. Participants on these programmes are the unemployed who have completed education levels III and IV. HE graduates are not supported by this programme because they are already legally allowed to work freelance after graduation.

The standardised VNFIL procedures that the Agency could use in its work are yet to be developed. The existing procedures related to vocational qualifications are being followed, where applicable. The Employment Agency's measures contain some VNFIL phases and promote non-formal learning and AE in different fields. As set out in the 2018 VNFIL Inventory, the VNFIL phases found within this process include raising awareness, individual career advice and consultation service, identification and documentation. It intends, for example, to introduce self-teaching and individual and group teaching services. The Agency also collects and archives data and analyses skills, formal education, work experience, special knowledge, activities and interests, as well as the professional development possibilities and the labour market needs for candidates based on which realistic and individual employment plans are decided upon. (Dimovska, 2019)

DIGITAL KEY SKILLS

Adult Learning for 2022/2023

Under the Erasmus+ Project ME Adult Learning for 2022/2023, registered job seekers could attend a licensed 'Acquiring and developing digital key skills' course run by the Montenesoft Education Centre, for which certificates were issued.

Source: <https://www.zzzcg.me/edukativni-centar-montenesoft-u-saradnji-sa-ministarstvom-prosvjete-raspisuje-javni-poziv/>

COCA COLA YOUTH SUPPORT PROGRAMME

Coca-Cola Youth Support Programme

Coca-Cola Youth Support Programme offers six training modules (negotiation, project management, time management, sales, finance management) with attendance certificates.

Source: [zzzcg.me](https://www.zzzcg.me)

Non-formal education is offered in the form of workshops, summer schools and similar, for which internal certificates are issued. Unemployed HE graduates have access to specific training courses held by potential employers. This professional training lasts nine months and is recognised as a 12-month internship.

The Agency participates in the regional Youth Guarantee initiative²⁶ that aims to enable a smooth transition for young people from education to the labour market, their integration at the labour market and that no one is left behind, and involves cooperation between different bodies.

The major **strength** of VNFIL in the labour market sector is the fact that the work of the state Employment Agency includes VNFIL and it is also partially involved in certified training programmes and exams leading to official and transferable vocational certificates aligned with the MQF. Intensive cooperation with external partners, such as private education providers and companies, is continuous and well-established. The Agency is included in important regional and international projects.

The major weakness of the VNFIL system is the fact that the system itself is in an early stage of development.

2.4. Validation in the third sector

The third sector is not involved in VNFIL. It can, under certain circumstances, offer specific training that does not require an official licence, however it does not have the right to issue any official certificates. Potentially, the third sector could be involved in raising awareness, informing and advice and guidance once the procedures have been published.

²⁶ <https://www.zzzcg.me/delegacija-zzz-na-konferenciji-centra-javnih-sluzbi-za-zaposljavanje-zemalja-jugoistocne-evrope-cpessec-u-skoplju/>

EU tools such as **Europass and Youthpass** are used by the third sector in Montenegro. Most organisations issue internal certificates of attendance upon successful completion.

Any non-governmental organisations (NGOs) intending to organise market-oriented AE programmes need to establish, register and gain licences for a private AE institution that can offer accredited/approved AE programmes, in line with the AE Act and other regulations in this sector. NGOs can offer non-commercial training programmes but cannot issue any VNFIL certificates.

The potential of this sector is limited, which was also demonstrated by the fact that no NGOs applied open call for interest of the Ministry of Education published for NGOs to participate in the forum on the Adult Education Plan for 2023-2026.

The new **Migration and Returnee Reintegration Strategy 2021 – 2025** addresses the issues of recognition of foreign diplomas and certificates for migrants and returnees for the purpose of employment or continuing in education without specifically addressing the issue of validation. It is unsurprising that financing the recognition process and lack of documentation on qualifications are mentioned as some of the key challenges. No statistics on recognition exist, however, it is mentioned that the Ministry of Education has completed all the requests submitted in the allotted period for those wishing to continue their education in Montenegro. Measure 1.14. calls for a mechanism to recognise foreign qualifications for people under international protection who do not possess sufficient documentation for the purpose of their applications to the Employment Service or for job seeking. No specific financial means have been earmarked for this purpose (Ministry of Interior of Montenegro, 2021).

Montenegro is one of the countries that regards education as a tool for integrating migrants into society and has therefore adopted high-level criteria for the assessment of prior learning among this target group. However, the focus is put on the formal recognition of foreign diplomas and certificates. (Eurydice, 2019)

The **Youth Strategy 2017 – 2021 Action Plan**, in goal b1, offsets out how to develop non-formal learning and improve VNFIL mechanisms as a key strategic outcome (outcome B: Young people have access to high-quality education). Implementation was planned for 2020 – 2021 with at least six training courses for a minimum of 25 teachers per year. No implementation reports have been released yet (Ministry of Education of Montenegro, Ministry of Sport of Montenegro, 2017).

3 Links to national qualifications framework (NQF)

The **MQF** is established and is in use in Montenegro. Its legal basis is the MQF Act adopted in 2010. The MQF was referenced to the EQF in 2014. The NVQ Acts covers education and training, accompanied by rulebooks and further documents specifying detailed procedures.

Since the 2018 VNFIL Inventory, improvements in linking VNFIL to the NQF have been made thanks to an improved methodology that enables improved learning pathways and stronger mobility for learners.

The **MQF register** is active and has been growing. Since the 2018 VNFIL Inventory, with the support of the IPA projects mentioned earlier, significant progress has been made. After initial changes to the methodology through the first Modernisation of education programs in VET and teacher training 2016 – 2017 project, three successive projects (see chapter 2.1.) have helped in the development of standards for occupations and qualifications, integration of key skills into the education system and the improvements in meeting the needs of marginalised groups.

According to the ETF MQF report from 2020, the database included more than 270 qualifications in formal VET (diplomas) and national qualifications system (certificates) at MQF levels 2 – 5 in 2020. The qualifications are classified according to type, size, MQF level and sector and ISCED. Qualifications and credits are equally valid in the formal education sector and in AE (ETF, 2020).

The MQF includes **qualifications of three types**: educational, vocational and additional. The primary and secondary GE qualifications are allocated to NQF levels 1 and 4, VET qualifications correspond to NQF levels 2 – 5, the HE qualifications equate to MQF levels 6 – 8. Vocational qualifications can be allocated at all NQF levels (ETF, 2021).

All qualifications give rise to credits and include the description of mandatory and optional modules under the MQF Act. **Education programmes** are modular. The **learning outcomes** are the standard for all qualification levels and an integral part of the description of each qualification. The learning outcomes are specified for all AE programmes (key skills, key competences, professional training and miscellaneous).

Legally, VNFIL is possible in all subsectors. The implementation arrangements are still in development with the most progress in the VET sector.

Obtaining a vocational qualification (or a part of it) by completing a specific module of a VET programme or through the VNFIL process is possible. VNFIL is currently carried out through the aforementioned process of direct assessment of knowledge and skills by an exam panel and without enrolling on an educational programme.

Upon successful completion of the direct assessment, the candidates receive a module-based certificate with a specific number of credits. VNFIL is linked to accumulation of credits. Every module in every education programme and every qualification unit gives rise to transferable credits. The education programme content defines how the modules of different programmes containing the same learning outcomes, qualification units or modules are interlinked.

Within AE, people can only earn individual vocational qualification units. These can be accumulated towards obtaining a full vocational qualification.

All certificates are equally valid and enable people to move up the chain towards obtaining a vocational qualification or an education level qualification. A vocational qualification can be recognised to continue education in a formal VET programme. If partial qualifications/key skills are obtained or validated, a certificate containing the name of the module/unit of qualification is issued as well as the name of the education programme.

The **micro-credentials system** is still not running in Montenegro; therefore, these cannot be obtained through the VNFIL process.

All qualifications are interconnected and transferable, so that they can be used partially and transferred (e.g. entrepreneurship and business culture modules can be recognised within all programmes requiring it) as a part of another full qualification. In this way, previous qualifications are recognised and can lead to obtaining a full qualification, which is a significant change as compared to the 2018 VNFIL Inventory.

A complete formal qualification can be obtained through combining single qualification units. With the support of the IPA projects mentioned earlier, individual qualification units obtained through AE are now based on the same learning outcomes as the formal education, which represents a significant advancement since the 2018 VNFIL Inventory for the system of which VNFIL is a part.

4 Standards and reference points

No major updates in terms of standards and reference points used in VNFIL have taken place since the 2018 VNFIL Inventory. The standards and reference points are based on the MQF Act and equal for all subsectors of education and training, including VNFIL. Learning outcomes are used for assessment.

The main reference points to be used are vocational qualifications. Vocational qualifications are based on a qualification standard (containing learning outcomes and a number of credits for each qualification) and an occupational standard (containing information on tasks to be performed within an occupation). Vocational qualifications are developed in line with a unified methodology, for which the VET Centre is responsible.

All qualification levels are based on learning outcomes. The qualification standards include the following mandatory elements: title and type of qualification, level or sublevel, qualification code, number of credits, learning outcomes, description of qualification (specification) and contents (entry requirements, mandatory and optional modules, assessment methods and criteria for assessment of learning outcomes).

Occupation standards are a common element for vocational qualifications. It is possible to attain a vocational qualification (or part of it) by completing a specific module on the VET programme. A vocational qualification can be recognised to continue education in a formal VET programme. The VET programmes are developed as modules that form units of a qualification. Key competences are an integral part of qualification standards.

Montenegro applies a credit transfer system equivalent to the European Credit Transfer System for VET (ECVET) and the European Credit Transfer System (ECTS). Credits are transferable and can be allocated to qualifications and units within them, as well as to education programmes or their parts (courses, modules, subjects). (ETF, 2021)

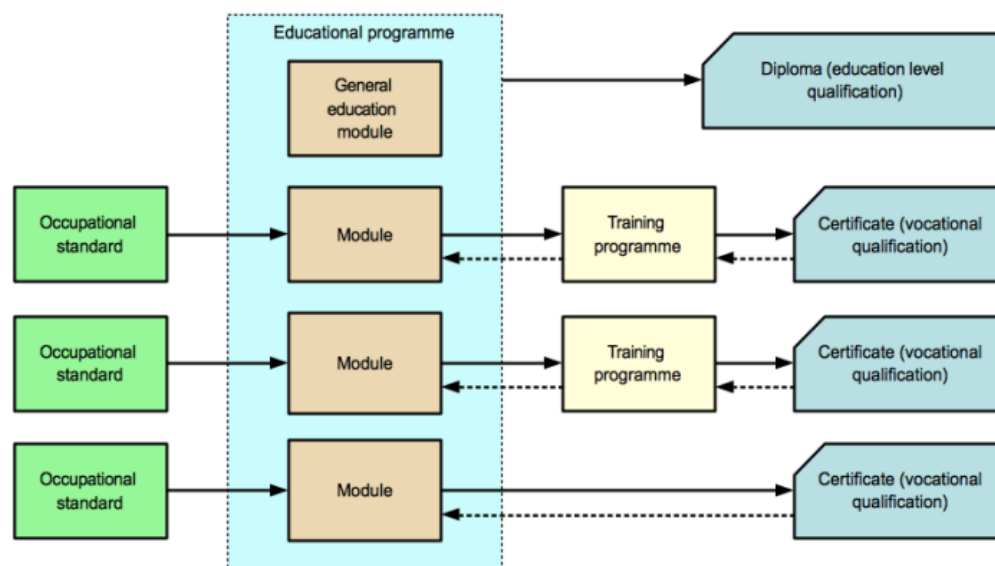


Figure 2 Relation between education and vocational qualifications. Source: MQF Referencing Report (2014), p. 17

The NQF Referencing report (2014) specifies that there will be stronger regulation of HE vocational qualifications with a new regulation, in line with the Higher Education Act, though this has not happened yet.

Since the 2018 VNFIL Inventory 170 occupation standards (47 in 2022, 31 in 2021, 37 in 2020 and 55 in 2019) have been developed as well as 149 qualification standards (33 in 2022, 32 in 2021, 38 in

2020 and 46 in 2019). The number of qualification standards for recognised education levels has increased by 32 (ten in 2022, seven in 2021, 15 in 2020) and the number of education programmes has increased by 29 (ten in 2022, 12 in 2021 and seven in 2019). All the programmes were developed by the VET Centre in cooperation with trade unions and adopted by the National Education Council of the Ministry of Education. The focus of these new programmes are the topics of traffic, electrical engineering, tourism and sales, hospitality, health and social protection, agriculture, civil engineering and design, information and communication technology (ICT), economy and law²⁷.

The fact that new education programmes and occupation standards were developed for attractive areas of study such as ICT or electrical engineering stimulates employers to become licensed education providers. It also motivates individuals to have the knowledge, skills and competence they already possess validated and certified through VNFIL.

²⁷ <https://www.gov.me/cyr/cso>

5 Organisations and institutions involved in the validation arrangements and their coordination

No significant changes have occurred since the 2018 VNFIL Inventory. The institutional setting is defined under the NQF Act and briefly presented below.

The **Ministry of Education** is responsible for the overall coordination, monitoring and QA of the validation process.

The **National Council for Education** is an important decision-making body that, *inter alia*, adopts all formal education programmes and also has an AE Committee under its remit. It was founded by the Montenegro government as an expert body supporting decision making and providing support in the field of education. For the purposes of fulfilling its duties, the National Council forms permanent and temporary working bodies. The permanent bodies are the General Education Council, Vocational Education Council, and the Adult Education Council. Temporary bodies are commissions, expert groups and other working bodies. The National Council adopts education programmes, AE education programmes, examinations catalogues for direct assessment of vocational qualifications and other.

The **VET Centre** is the national agency responsible for developing and strengthening the vocational and AE system and MQF levels 1 – 5 qualification development in VET, expanding the AE providers network and validation related guidance and counselling.

Licensed AE providers conduct assessment for vocational qualifications at MQF levels 1 – 5. Examinations catalogues are available for each vocational qualification based on qualification standards and course content. An examination panel is formed by the education provider from the list of licensed examiners, drawn up by the **Examination Centre**. The Examination Centre organises the training and licensing of VNFIL assessors, publishes public calls for interested assessors and shortlists them for each vocational qualification. It submits the proposal listing prospective assessors to the Ministry of Education, which issues them five-year licences to (ETF, 2021).

HEIs can carry out assessments and award vocational qualifications at MQF levels 6 – 8 for their special training programmes accredited by the Higher Education Council, in accordance with the Higher Education Institution Act.

The **Ministry of Labour and Social Welfare** publishes the education programmes that lead to vocational qualifications in the Official Gazette.

The **Qualifications Council** consists of all relevant stakeholders and seeks to improve the national qualifications system. There are also **sector panels** that comprise a number of relevant representatives from the sector.

The NQF Act specifies that a close partnership between the key national education bodies and the licensed education providers is needed for effective implementation of VNFIL.

6 VNFIL service providers

Since the revision of the NVQ Act in 2016, responsibility for the assessment and award of vocational qualifications has been transferred to licensed education providers. As of December 2022, a total of 129 AE providers were licensed, with 15 new providers licensed in 2021 and 2022²⁸.

In terms of capacity to implement VNFIL, public AE providers (schools, VET schools and HEIs) have greater capacities to implement VNFIL and could thus provide significant support to the process once the system is fully established and operational. With the exception of private universities, private AE providers mostly have limited capacity in terms of both staff and the know-how as to the possibilities and requirements for VNFIL.

The core business particularly of private AE providers remains income generation through enrolments in education and training programmes. The major obstacles for the implementation of VNFIL are limited resources, interest and motivation on the part of the providers to offer VNFIL services and take the responsibility for issuing VNFIL and diploma recognition certificates.

Evaluation of the work of the AE providers and the implementation of AE programmes is conducted by the VET Centre.

Licensed AE providers can offer complementary courses for candidates to gain a full qualification. They must fulfil all required technical, personnel and other requirements for the implementation of education programmes leading towards full or partial vocational qualifications.

AE providers are licenced by the Ministry of Education based on the criteria stipulated in the Law on education and raising children, the Rulebook on conditions for founder institutions in the field of education and raising children and the Adult Education Act. Licensing of providers is contingent upon fulfilling certain conditions such as provision of space, teaching staff and equipment to run the education programmes, payment of an administrative fee of EUR 500 and having a bank guarantee. Schools, colleges and universities that are already licensed can also submit a request for amending their statute and adding AE. Assessors on the assessment panels refer to the examinations catalogues and need to be licenced by the State Examination Centre.

The AE and LLL departments of the VET Centre organise online and on-site advice and instruction sessions for AE providers, informing them of the legal, planning and strategic documents and how to use them. Further systematic measures helping licensed AE providers to prepare for their VNFIL roles (e.g. support with developing methodologies, further staff training) have not been implemented. Assessors need to complete a training course for assessors (that is mandated by the Ministry of Education and published as a public call of interest), in addition to the required work experience and the necessary exam.

The VET Centre, and its departments for AE and LLL, provide expert support and advice in relation to all the procedures required, including VNFIL, to the extent currently possible.

²⁸ Source: Information provided by the Ministry of Education from the Register of licensed adult education providers, provided by e-mail on 6 December 2022

7 Information and guidance

No major changes have occurred since the 2018 VNFIL Inventory.

7.1. Information, outreach and promotion

The overall responsibility for information and guidance within the process of obtaining qualifications lies with the Ministry of Education, VET Centre, Montenegrin Chamber of Commerce, authorised trade union, authorised associations of employers, Employment Agency, Chamber of Crafts and education providers²⁹. However, information, outreach and promotion work is sporadic and linked to specific projects or initiatives implemented e.g. by the Employment Agency.

The website for the MQF³⁰, which was built with support from an EU project, has not been updated on a regular basis since. Currently, it does have subsections for information on direct knowledge assessment, licensed education providers and application procedures, however these tabs are left either empty or offer very general information only.

Action on information, outreach and promotion related to VNFIL is included under previously mentioned regulatory and strategic documents, with practical implementation still in development.

An overall system is not in place providing information on and promoting VNFIL, with the exception of specific measures, such as those implemented within ALMPs of the Employment Agency and AE Days the VET Centre runs. In these cases, information is tailored and distributed to specific target groups in various formats, including electronically. Such measures are based on clearly defined cooperation agreements with all relevant stakeholders (authorities, education providers, target groups and others) and follow the national policy and strategy documents.

The Ministry of Education published a Guide through the system of non-formal education in Montenegro in 2016 and updated it thanks to Erasmus+ funding in 2019. The Guide contains an overview of the non-formal education field, ways of enrolling, foreign languages as a key skill and all the courses and their licensed providers. Apart from briefly mentioning that certificates can be obtained through a direct assessment, no further VNFIL related information has been incorporated into the Guide. There are 200 print copies and it is also available in electronic form, presented in a style suitable for a well-educated reader. (Ministry of Education, 2019)

Outreach activities on VNFIL procedures to potential VNFIL beneficiaries come under the aforementioned initiatives. Most of them seek primarily to promote education and training possibilities and are not focused on VNFIL.

Adult Education Days

The VET Centre has been organising AE Days (formerly called the AE Festival) at which different AE topics are discussed at round tables, seminars, workshops, conferences, open days and similar. At the 21st AE Days event, the VET Centre organised a presentation entitled 'AE — perspectives and challenges' for the representatives of the licensed AE providers and employee organisations, and the state-run Ivan Uskoković VET college (licensed AE provider) ran organised a round table event on the

²⁹ Law on National Vocational Qualifications (2016), Art. 16

³⁰ <http://www.cko.edu.me/>

topic of 'Regulations in the field of vocational qualifications and skills assessment after completion of a course', which involved the VET Centre, AE providers, employers and others.

Source: <https://zuns.me/prosvjetni-rad/prosvjeta/obrazovanje-odraslih>

Digital technology is used to support outreach on existing initiatives. The VET Centre developed Guidelines for using digital technology in online teaching for adults to strengthen its teaching staff's digital skills. A national education programme for applying digital tools to AE was implemented in all regions of the country. Furthermore, around 250 teaching staff at the AE providers participated in an Office 365 training course at the end of 2022.

No specific bodies are mandated for outreach activities.

EXAMPLE

VET Centre, Employment Agency

The VET Centre offers information related to AE, LLL, courses on offer, AE providers, professional training and more to all individuals and employers. AE and LLL departments organise online and on-site advice and instruction sessions for AE providers, informing them of the legal, planning and strategic documents and how to use them.

An example of good practice in the field of information and promotion/raising awareness is the work of the Employment Agency. Within its ALMPs, the Employment Agency closely cooperates with education providers and employers and offers education and training for those registered unemployed, students, and employees whose expertise is no longer needed in the labour market. The Employment Agency is continually publishing related calls for interest on its website.

Source: www.gov.me/cso; zzzcg.me

7.2. Advice and guidance³¹

As VNFIL is still in an early stage of development, no integrated advice and guidance system has yet been established. Specific VNFIL initiatives, such as active labour market measures, or initiatives taken by the licensed AE providers, offer advice and guidance within those specific projects free of charge.

An example of good practice is the work of the Employment Agency that offers advice and guidance for different target groups using direct contact, information provided on its web site, individual and group events and other methods.

³¹ Lifelong/career guidance includes 'a range of activities that enables citizens of any age and at any point in their lives to identify their capacities, competences and interests, to make educational, training and occupational decisions and to manage their individual life paths in learning, work and other settings in which these capacities and competences are learned and/or used.' Guidance is in fact an umbrella term that encompasses advice as well as activities such as informing, coaching, teaching, assessment and advocacy (See, The European Lifelong Guidance Policy Network (2014). Lifelong Guidance Policy Development: Glossary, <http://www.elgpn.eu/publications/browse-by-language/english/elgpn-tools-no.-2-llg-glossary> and Council of the European Union, (2008). Council Resolution on better integrating lifelong guidance into lifelong learning strategies, https://www.consilium.europa.eu/ueDocs/cms_Data/docs/pressData/en/educ/104236.pdf).

8 Validation practitioners

No significant changes since the 2018 VNFIL Inventory.

8.1. Profile of validation practitioners

The profile of validation practitioners remains unspecified, with the exception of the profile of the assessors. Assessors are licenced by the Ministry of Education following nominations from the National Examination Centre. Job profiles for other VNFIL professionals, such as advisors/guidance counsellors/mentors, coordinators, validation managers and external observers have not yet been drawn up in Montenegro.

Licensing of assessors is detailed in the Rulebook on issuing and revoking NVQ assessor licences.

8.2. Qualification requirements

In terms of mandatory requirements for VNFIL practitioners, again these have only been laid down by assessors. Under the NVQs Act (2016), assessors need to fulfil the following requirements:

- appropriate education background and level, in line with the examinations catalogue
- at least five years of professional experience in a relevant field of work
- have completed the training programme for assessors detailed by the Ministry of Education in its public procurement notice.

Employees of the Ministry, VET Centre or Examination Centre cannot be licensed. The licence is issued for a period of five years.

8.3. Provision of training and support to validation practitioners

Training for assessors is mandatory as a prerequisite for obtaining a licence. No further professional development measures for VNFIL practitioners are yet in place.

9 Quality assurance

We have not identified any significant developments in terms of quality assurance since the 2018 VNFIL Inventory.

The 2016 Law on NVQ specifies the quality criteria for the certification of vocational qualifications, describing the main certification criteria for all qualification sectors. There are no specific sector-related guidelines.

Further QA mechanisms only exist within specific projects and/or initiatives that have been mentioned previously. There are currently no external audits on the VNFIL mechanisms and procedures or specific measures for continuous improvement of these services.

10 Inputs, outputs and outcomes

The sheer number of VNFIL certificates being issued in the past four years is quite remarkable considering the size of Montenegro. Other than this, we identified no significant developments or improvements since the '2018 VNFIL Inventory in terms of inputs, outputs and outcomes.

10.1. Funding

No specific national VNFIL funding framework is yet in place. Thinking on funding is embedded in education and training provision and ALMPs. As a result, all funding is project/initiative-based and does not yet include other sustainable funding models.

The cost of developing occupational standards, education programmes leading to vocational qualifications and exam catalogues comes out of the national budget, as does licensing assessors and publishing public procurement notices. The Employment Agency finances qualification initiatives that can include validation procedures. Eligibility for funding is specified separately on each initiative, depending on the characteristics of the public procurement notice. Potential barriers to accessing this funding are related e.g. to applicants' overall level of education and its implications for their interest in and access to information, computer literacy or availability of ICT equipment. Once again, individual funding measures provided by the Employment Agency are seen as an example of good practice.

Outside of these measures, the costs of VNFIL are covered by individual candidates.

10.2. Distribution of costs

The VNFIL procedures include the fees paid to the licensed education providers, which are not set nationally but determined individually for specific validation procedures or initiatives. No evidence could be collected on claims that companies buy validation services for their employees.

Licensed providers tend to work in areas where there is the possibility of state or donor funding; the Employment Agency is the main partner in this area.

10.3. Evidence of benefits to individuals

No evidence was collated on the benefits of the VNFIL arrangements to individual candidates. No systematic VNFIL monitoring mechanisms exist yet. In cases where official vocational qualification certificates are issued in line with the national legislation and rulebooks, they are equally recognised independently considering the issuing context, because they can only be issued by the licensed providers. Other kinds of transfer of validation outcomes between different contexts, e.g. between education and training and the labour market, are not clearly defined.

10.4. Beneficiaries and users of validation processes

10.4.1. Validation trends

There are 129 licensed AE providers authorised to provide AE services and VNFIL. From 2019 to 2022, a total of 2 160 certificates were issued through the direct assessment procedure (VNFIL). In the same period, a total of 10 740 persons followed AE courses. The table below gives the AE enrolment figures for the past three years and includes the number of adults who obtained certificates through the direct assessment procedure.

AE Attendance and VNFIL

(Total estimated inhabitants as per 1 January 2022: 617 683)³²

Year	2019	2020	2021	2022
Total AE education attendees*	3 158	2 355	2 391	2 836
Number who obtained certificates through the direct assessment procedure**	569	523	652	416

Data provided by the Ministry of Education by e-mail on: (*) 7 February 2023 and (**) 7 April 2023, drawn from the Montenegrin Education Information System MEIS (database not externally accessible)

According to the data from the Montenegrin Education Information System (MEIS)³³, most certificates issued 2019 – 2022 after a direct assessment of knowledge, skills and competence were issued for vocational and key skills (mostly foreign languages) qualifications, as shown in the tables below. A total of two people obtained certificates after direct assessment for completion of the elementary education programme for adults in the same period.

Year	2019	2020	2021	2022
Validation certificates issued for key skills	229	249	339	171
Validation certificates issued for vocational qualifications	340	274	313	245
Validation certificates issued for adapted elementary education programme for adults	0	0	1	1

For key skills, the majority of certificates issued after a direct assessment (VNFIL) were issued for foreign languages (170 in 2022, 326 in 2021, 234 in 2020 and 185 in 2019), mainly in English, with further languages being Italian, German and Spanish. To a much lesser extent, key skill certificates were issued for digital literacy skills (work on the computer and key digital competence training) (1 in 2022, 13 in 2021, 15 in 2020, 44 in 2019).

The majority of validation certificates were issued for vocational qualifications with the majority of certificates being issued for the qualifications of accounting technician, certified accountant and operator of various machines used in construction machines. To a lesser extent, qualifications were obtained for the following professions: forklift operator, driving instructor, protection specialist, security guard, care home supervisor, beautician, manual worker, hairdresser, assistant hairdresser, tour guide, pyrotechnician, and others.

10.4.2. Validation users

Validation users in the past four years were mainly people wishing to obtain language key skill certificates and the vocational qualifications in demand on the labour market (direct assessment procedure).

No further data on validation users could be identified at the time of this report.

10.4.3. Validation and disadvantaged groups

The process by which examination takes place (form, duration, composition of the examination panel) is adapted for candidates with special needs, as specified in Article 11 of the NVQs Act (2016), as reported previously.

³² Source: National Office for Statistics - Monstat, <https://www.monstat.org/cg/page.php?id=273&pageid=48>

³³ Data provided by the Ministry of Education per email on 7 April 2023

There is support for the unemployed, including the long-term unemployed and people whose skills are no longer needed in the labour market, through the special programmes the Employment Agency runs, mentioned throughout this report.

Education programmes for learning Montenegrin geared to asylum seekers and foreign citizens under subsidiary protection have been brought in, as has a course on the history and cultural heritage of Montenegro for the same target groups. The state-run Slobodan Škerović Grammar School runs both these courses as a licenced AE provider. The Ministry of Education funds the full costs.

Asylum seekers can take courses leading to professional qualifications or other education programmes if they fulfil entry conditions.

11 Validation methods

No significant developments in terms of validation methods have been made since the 2018 VNFIL Inventory.

As previously reported, the assessment is laid down in the NVQs Act and uses specific examinations catalogues and methods for each vocational qualification.

The unemployed receive support from the Employment Agency that helps candidates with the identification and documentation procedures.

There are no official or informal documents containing information about validation methods in Montenegro.

12 Use of ICT in validation

No evidence was found of standardised digital tools used for VNFIL.

13 The position of validation in society

VNFIL is visible in different national strategies, policies and structures in Montenegro (see chapter 2). While the legal framework has mainly remained the same since the 2018 VNFIL Inventory, the MQF has improved significantly and VNFIL was recognised by all the main strategic documents.

However, the actual status of validation in Montenegro has not significantly improved.

The majority of the population does not know about validation, and related initiatives are scarce. The Employment Agency and the VET Centre remain pioneers in running related initiatives but they are more focused on qualification measures and only marginally deal with validation.

14 Recommendations

Overall, the legal and strategic framework and the MQF lay the groundwork for establishing a functional VNFIL procedure system in Montenegro. In terms of implementation, VNFIL is hindered by the lack of procedures, guidelines, funds and supporting mechanisms for all stakeholders involved.

On policy

- Adopt the secondary legislation and guidelines on the VNFIL process, giving rise to funding at the national level and enabling efficient procedures, including QA mechanisms to be drafted.
- Establish VNFIL funding mechanisms for the priority areas.
- Stronger inclusion of VNFIL in the upcoming period in areas related to economic development, migration, and the Employment action plan.
- Agree and initiate VNFIL pilot projects in the priority areas (state or project-funded).
- Establish data collection mechanisms in line with the European mechanisms, to enable evidence-based policy making.
- Establish strategic cooperation agreements between the stakeholders for specific VNFIL areas (authorities, employers, candidates, providers and the third sector).
- Agree on the measures for improving the VNFIL's image and access to information, especially for the vulnerable groups (e.g. low-qualified, migrants).
- Identify existing AE and LLL initiatives (career guidance, ALMPs, AE and LLL projects and initiatives) in which it would be helpful to promote VNFIL.
- Put in place measures to support the AE providers and other bodies so that they can participate in VNFIL provision.

On implementation

- Pilot programme implementation
- Run tailor-made awareness, information and outreach campaigns to reach the wider public, with focus on the priority areas.
- Establish continuous development training options for the VNFIL practitioners.

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Name	Organisation	Position	Yes/No*
Sandra Brkanović	VET Centre	Head of the Department for Qualification Research and Development	Yes
Ljiljana Garić	VET Centre	Head of the Department for AE and LLL	Yes

* Interviewees agree/disagree to their name, organisation and/or position being used in this country report.

17 ACRONYMS

AE	Adult education
ECTS	European Credit Transfer System
ECVET	European Credit Transfer System for Vocational Education and Training
EQF	European Qualifications Framework
ETF	European Training Foundation
GE	General education
HE	Higher education
HEI	Higher education institution
ICT	Information and communication technology
IPA	Instrument for Pre-Accession Assistance
LLL	Lifelong learning
MQF	Montenegrin qualifications framework
NGO	Non-governmental organisation
NQF	National Qualifications Framework
NVQ	National Vocational Qualification
QF-EHEA	Qualifications Framework for the European Higher Education Area
VNFIL	Validation of non-formal and informal learning
VET	Vocational education and training