



# TOWARDS EXCELLENCE IN VET WITH FOCUS ON THE VALIDATION AND ACCREDITATION PROCESS IN KOSOVO



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ALLED II – “Aligning Education and Training with Labour Market Needs” Programme, funded by the European Union (EU) and the Austrian Development Cooperation (ADC), implemented by the Austrian Development Agency (ADA)

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## List of abbreviations

<b>AB</b>	<b>Advisory Board</b>
<b>ADA</b>	<b>Austrian Development Agency</b>
<b>ALLED</b>	<b>Aligning Education for Employment</b>
<b>AVETAE</b>	<b>Agency for Vocational Education and Training and Adult Education</b>
<b>CPI</b>	<b>Institute of the Republic of Slovenia for VET</b>
<b>CVETA</b>	<b>Council for Vocational Education and Training and Adult Education</b>
<b>DVET</b>	<b>Department for Vocational Education and Training Department</b>
<b>EARK</b>	<b>Employment Agency of the Republic of Kosova</b>
<b>EC</b>	<b>European Commission</b>
<b>ECVET</b>	<b>European Credit system for Vocational Education and Training</b>
<b>EKKA</b>	<b>Quality Agency for Higher and Vocational Education</b>
<b>EQAVET</b>	<b>European Quality Assurance in Vocational Education and Training</b>
<b>EQF</b>	<b>European Qualification Framework</b>
<b>EstQF</b>	<b>Estonian Qualifications Framework</b>

<b>EU</b>	<b>European Union</b>
<b>HEI</b>	<b>Higher Education Institution</b>
<b>KAA</b>	<b>Kosovo Accreditation Agency</b>
<b>KAS</b>	<b>Kosovo Agency of Statistics</b>
<b>KESP</b>	<b>Kosovo Education Strategic Plan</b>
<b>LFS</b>	<b>Labour Force Survey</b>
<b>LUXDEV</b>	<b>Luxembourg Development Cooperation Agency</b>
<b>MES</b>	<b>Ministry of Education and Science</b>
<b>MED</b>	<b>Municipal Education Directorate</b>
<b>MLSW</b>	<b>Ministry of Labour and Social Welfare</b>
<b>NFQ</b>	<b>National Framework of Qualification</b>
<b>NLQF</b>	<b>Dutch Qualifications Framework</b>
<b>NQA</b>	<b>National Qualifications Authority</b>
<b>NQF</b>	<b>National Qualifications Framework</b>
<b>NVQ</b>	<b>National Vocational Qualification</b>
<b>NQS</b>	<b>National Qualifications Standard</b>
<b>SQF</b>	<b>Slovenian Qualifications framework</b>
<b>QA</b>	<b>Quality Assurance</b>
<b>QQI</b>	<b>Quality Qualification Ireland</b>
<b>RPL</b>	<b>Recognition of Prior Learning</b>
<b>VET</b>	<b>Vocational Education and Training</b>
<b>VETI</b>	<b>Vocatiional Education and training institution</b>
<b>VS</b>	<b>Vocational School</b>
<b>VTC</b>	<b>Vocational Training Center</b>

# 1. Background

National Qualifications law got ratified by Kosovo Government back in 2008. The purpose of the law is to establish a National Qualifications System, based on a National Qualifications Framework (NQF) regulated by a National Qualifications Authority (NQA). The law regulates the development and maintenance of the National Qualifications Framework and the awarding of qualifications. The National Qualifications Authority established under the provisions of this Law shall establish and maintain a comprehensive framework of qualifications and regulate the awarding of qualifications in the Framework with the exception of qualifications which are regulated under the provisions of the Law on Higher Education and qualifications explicitly regulated and under the provisions of other legislation. In addition, according to the NQF Law, all education and training providers being it public, private, formal or non-formal should undergo through accreditation process. Public Vocational Training Centers under the Ministry of Labour and Social Welfare (MLSW) were among the first pioneers undergoing through the accreditation process. This was not the case with the public Vocational Schools. In 2013, the National Qualifications Authority (NQA) initiated the referencing process aiming to identify the links between the levels of the NQF with the European Qualifications Framework (EQF), which has resulted in drafting of the referencing report. The referencing report aimed to show the links between the levels of the NQF and the EQF by describing clearly the existing qualification levels as they apply in the sectors of the education system in Kosovo.

Based on the Kosovo referencing report approved by EQF in 2016, and the Education Ministry's decision based on VET law<sup>1</sup> to start with the accreditation procedure, only few upper secondary public Vocational Schools were able to enter in the process beginning of 2019. Out of 68 VET schools in Kosovo, 6 VET schools decided to undergo through accreditation procedure and only two Centers of Competence got accredited to offer 8 qualifications. Whereas, out of seven interviewed VET schools as part of this analysis, two VET schools entered in the process and failed to be accredited, two of them started and stopped in the midway and last three VET schools did not apply at all. This stagnation continues to be reflected in the progress Country report that the European Commission issues on an annual basis<sup>2</sup>.

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1. Law No. 04/L-138 on Vocational Education and Training, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=8676>

2. Kosovo Progress Report 2019, <http://mei-ks.net/repository/docs/kosovo-report.pdf>

## 2. Introduction

The overall objective of “Aligning Education and Training with Labour Market Needs – ALLED Phase II” (in further text ALLED2) project, funded by the European Union (EU) and co-funded by the Austrian Development Agency (ADA), is to reduce poverty through increased labour market participation and improved employability for the population in Kosovo. In addition, the specific objective of the ALLED2 is to strengthen the quality and relevance of education and training programmes for the labour market and to support the adaptation of the legislative framework and mechanisms as a precondition for increased employability. One of the **ALLED2 project’s key component is to strengthen the quality assurance mechanisms within the education and training system**, as a precondition for increased employability and the relevance of education and training programmes.

In order to support the accreditation process, ALLED 2 project has undertaken a situation analysis of the current NQA processes and procedures in place for validation/accreditation. Moreover, part of the analysis will be also the assessment of the skills and capacities of VET training providers to meet criteria for validation. The purpose of this analysis is to support the improvement of qualifications development, Quality Assurance (QA) arrangements of VET institutions and their further development to implement high quality qualifications.

Specific objectives of the assessment are as following:

- Assessment of existing processes, procedures and regulations, which support/hinder the validation and accreditation process.
- Assessment of the capacities of the VET providers for the implementation of the high-quality qualifications.
- Assessment of the existing manuals and guidelines for validation of the qualifications
- Identifications of needs for adaptations of the (existing) instruments and tools (templates, administrative instructions etc.)
- Identifications of the training needs for VET providers staff assigned for QA and performance management
- Analysis of the EU trends related to the validation and accreditation of VET provision
- The analysis of skills and capacities of NQA and VET institutions for validation and implementation of the qualifications should include sound recommendations for the update of 2<sup>nd</sup> generation Guidelines 2.0 applied by NQA.

This report starts with description of the methodology and the overall education context in Kosovo, including VET education system and its relation to NQF. It further describes EQF and implementation practices of validation and accreditation procedure from four EU countries (such as; Ireland, Estonia, Slovenia and Netherlands). Then it outlines the current QA processes and procedures in place for validation/accreditation that are facilitated by NQA, including national policy strategies, institutional framework. Findings from the legal framework, implementation practices in regards to validation and accreditation procedure and institutional capacities to carry out validation procedure in Kosovo are followed by the concrete recommendations drawn from the conducted interviews with stakeholders, which are meant to support improvement of the procedures in place, to enable the education and training providers to meet required criteria and further implement the qualification.

## 3. Methodology

The analysis included (i) Desk research and analysis of secondary sources and (ii) Qualitative research based on stakeholder interviews.

The desk research was realized through desk review of the secondary data, such as policy documents, legal framework, and different reports, including the review of supporting documentation/guides for the implementation of validation and accreditation procedure. Initially, the review has consulted:

- i. national policy documents, such as National Development Strategy 2016-2021, Kosovo Education Strategic Plan 2017-2021, Quality Assurance Strategy for Kosovo Pre-University Education 2016-2021, Kosovo National Qualifications Framework (2011);
- ii. legal framework documents, such as Law on National Qualifications, Law on Pre-University Education, Law on Vocational Education and Training, Law on Adult Education, including bylaws;
- iii. developed guides such as Internal verification of assessment for Vocational Qualifications, Guide to further development of a quality system for external evaluation of VET in Kosovo, Quality Assurance in VET Institutions, etc.

It continued with exploring the global trends related to validation and accreditation procedures through consulting reference reports from four European countries in order to get an overview of the institutions involved in the validation and accreditation processes and the implementation practices.

In addition to desk research, the implementation was followed with the qualitative research through conducting semi-structured interviews with open-ended questions of key stakeholders. More specifically, the stakeholders to be interviewed were divided into three groups, and specific questionnaires were developed for each group. Due to the circumstances created by pandemic situation caused by Covid 19, the interviews were realized through the application of a virtual online platform. The groups consisted of:

### **Group 1: Public Vocational Education and Training Institutions-VETI (Vocational Schools and Vocational Training Centers)**

The questionnaire (under annex 1.1) for interviewing Public Vocational Education and Training Institutions consisted of three parts considering that within the interviewed in-

stitutions were institutions that underwent through the (i) Validation procedure. (ii) Accreditation procedure and (iii) in none of the processes. In each VETI was interviewed the Quality Assurance Coordinator, whereas in some VETIs the Quality Assurance coordinator was accompanied by the School Director/VTC Director. The aim of the semi-structured interviews with VETIs was to get an overview of the situation from the field. The interview questions were structured in a way to get the opinion from VET institutions regarding the process and procedure itself, difficulties faced during the implementation phases and further more about the clarity of the application form, the requirements for documentation to be submitted and the quality of supporting documentation- guidelines. Items observed during the interviews were:

- The overall experience of Vocational Training Institutions with the validation/accreditation process;
- The challenges they have faced during the fulfilment of NQA criteria and requirements, including their opinion on the supporting guides;
- The internal capacities of VETIs to fulfil the NQA requirements,
- Recommendations for further improvement of the validation and accreditation procedure;

Out of 20 partner<sup>3</sup> schools and 4 sectors<sup>4</sup> supported by ALLED 2 project, were selected a sample of six partner Vocational Schools and additional one Vocational School (listed below) as a non-partner of ALLED2 for comparison. The selection process has considered representation from each geographical area as well as the representation of all sectors supported by the ALLED 2 project, such as:

- “Tafil Kasumaj”-Deçan -Production and Processing-Mechatronics sector
- “Andrea Dursaku” - Kamenica - Energy sector
- “Arkitekt Sinani” Mitrovica South - Energy and Food processing sector
- “11 Marsi” - Prizren - Production and Processing-Mechatronics and Energy sector
- “Abdyl Frasher” - Pristina - Food Processing and Agriculture sector
- “Jonuz Zejnullahu” - Viti - Production and Processing-Mechatronics, Food Processing and Energy sector
- “Shtjefen Gjeqovi” - Prishtine- Production and Processing-Mechatronics sector (non-partner school of ALLED2)

In regards to Vocational Training Centers (VTC), out of four partner VTCs of ALLED 2 project, for a sample were selected three VTCs. The reason behind was since VTCs have had longer experience with accreditation and validation of qualifications. The interviewed VTCs were:

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3. Map with ALLED 2 partner schools, <http://alled.eu/en/edu-net-2/>

4. Agriculture, Food processing, Manufacturing and processing, and Energy and Electricity Supply

- Vocational Training Center in Prizren
- Vocational Training Center in Peja
- Vocational Training Center in Pristina

### **Group 2: Representatives from the National Level Institutions**

Areas discussed with representatives from different national level institutions, through the developed questionnaire (under annex 1.2), have fed the research with information and views how they see the readiness of public VETIs to undergo through validation and accreditation process. The focus of interviewing the respective group was to understand the difficulties/obstacles/barriers that public VETIs face during the process of validation of qualifications and accreditation of institutions in order to come up with concrete recommendations.

Within this group, the interviews were carried out with:

- Director of Department for Vocational Education and Training (DVET) under MES;
- Acting Director of Agency for Vocational Education and Training and Adult Education (AVETAE);
- Head of Division for Quality Development and Certification under Employment Agency of Republic of Kosovo (EARK);
- VET expert from LuxDev project;

### **Group 3: Representative from the National Qualifications Authority**

The questionnaire for NQA (under annex 1.3) was developed after all other interviews were completed. The identified concerns and suggestions from the previous interviews were included in the content of the questionnaire, in order to understand the views of NQA on the expressed concerns and views, but also procedure by both sides, the VETIs and the NQA. The interview was conducted with the Director of NQA.

## 4. Overall Context

According to the Kosovo Agency of Statistics (KAS), who publishes quarterly labour force surveys (LFS), the last published LFS report from 2019<sup>5</sup> indicates that Kosovo completed year 2019 by registering the unemployment rate of 25.7% (table 1). More in detail according to LFS 2019, in Kosovo there were 125,305 persons aged 15-64 years who were unemployed, 81,576 of whom were males and 43,729 females (Table 1). Unemployment rate was highest to females by 34.4% than to males by 22.6%. The share of youth not in employment, education or training (NEET) accounted for 32.7% of the young population.

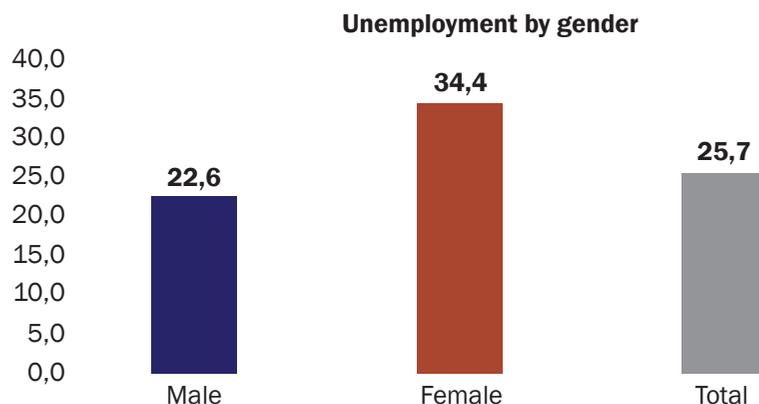


Table 1: Unemployment rate in percentage by gender in 2019, Source LFS 2019

The highest unemployment rate of 49.4% is recorded among youth aged 15-24, while as in 2019 the unemployment rate of secondary vocational graduates has decreased to 25.2% compared to 2018, where 32.5% of secondary vocational graduates were unemployed. The decrease of unemployment percentage of VET school graduates is emphasizing that the economy in Kosovo is getting day by day more aware on the importance of VET sector, but the recent situation with COVID-19 has had a negative influence in the Kosovo labour

5. Labour Force Survey 2019 by Kosovo Agency of Statistics, <https://ask.rks.gov.net/media/5412/labour-force-survey-2019.pdf>

market. The first COVID-cases were identified in early March and the latest data from the EARK immediately in April has announced a tremendous increase in the number of new jobseekers numbering almost 40 000 thousand. Nonetheless, despite the problems caused by COVID-19, Kosovo needs to continue reforms in the education sector with focus in VET in order to improve the likelihood that graduates find themselves in the labour market through recognized qualifications, being it in Kosovo or abroad.

General Structure of Education System in Kosovo is outlined under Figure 1. Looking at VET pathways, the education programmes offered by upper secondary Vocational Education (ISCED 3-NQF level 3 &4) lead to Post –Secondary Vocational Education (ISCED 4, NQF 5) without entering Matura exam. In addition, licensed providers accredited by the Kosovo Accreditation Agency (KAA) offer short cycle tertiary programmes (ISCED 6, NQF 5).

Looking at the Governance of the Vocational Education and Training (VET), VET in Kosovo is a shared responsibility of two government departments, Ministry of Education and Science (MES) and Ministry of Labour and Social Welfare (MLSW)(see figure 2). Whereas, vocational education is part of the Kosovo Education System managed by MES with total of 68 schools with a focus on vocational education and training, vocational training is offered by a number of public and private providers, including companies. Except for 6 VET schools directly managed by Agency for Vocational Education and Training and Adult Education (AVETAE), all other schools are administered by municipal authorities based on the Pre-University Education Law<sup>6</sup>. In the field of vocational training there are 8 vocational training centres (VTCs) administered by EARK, whereas other providers, are independent private entities. Other important actors in the governance and management of the VET system are Council for Vocational Education and Training and Adult Education (CVETAE), National Qualifications Authority (NQA), Education Inspectorate, as well as the Employment Agency of the Republic of Kosovo (EARK).

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6. Law No.04/L –032 on Pre-University Education, <https://masht.rks-gov.net/uploads/2015/06/03-lig-ji-per-arsimin-parauniversitar-anglisht.pdf>

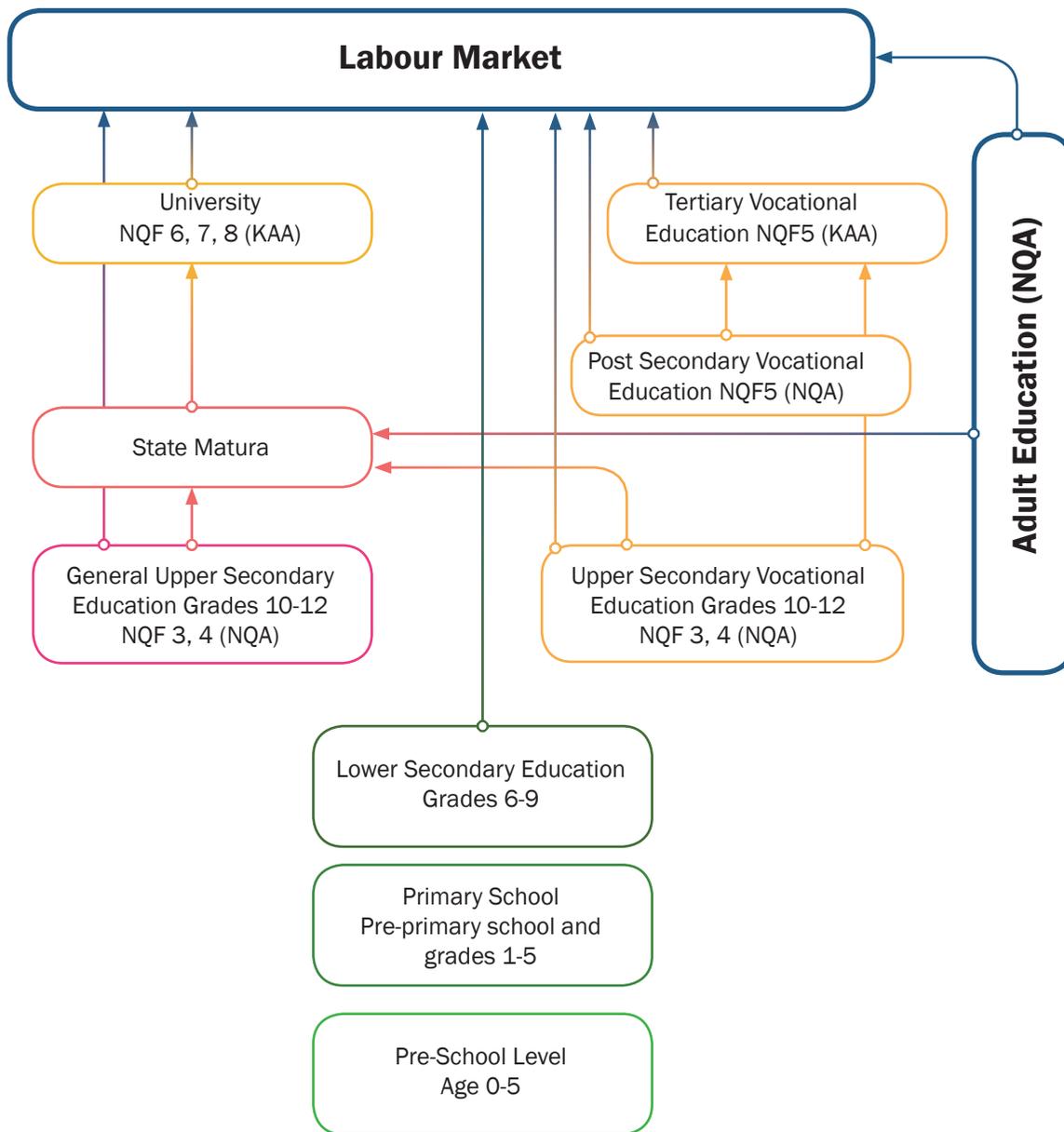


Figure 1. General Structure of the Education System and VET pathways in Kosovo

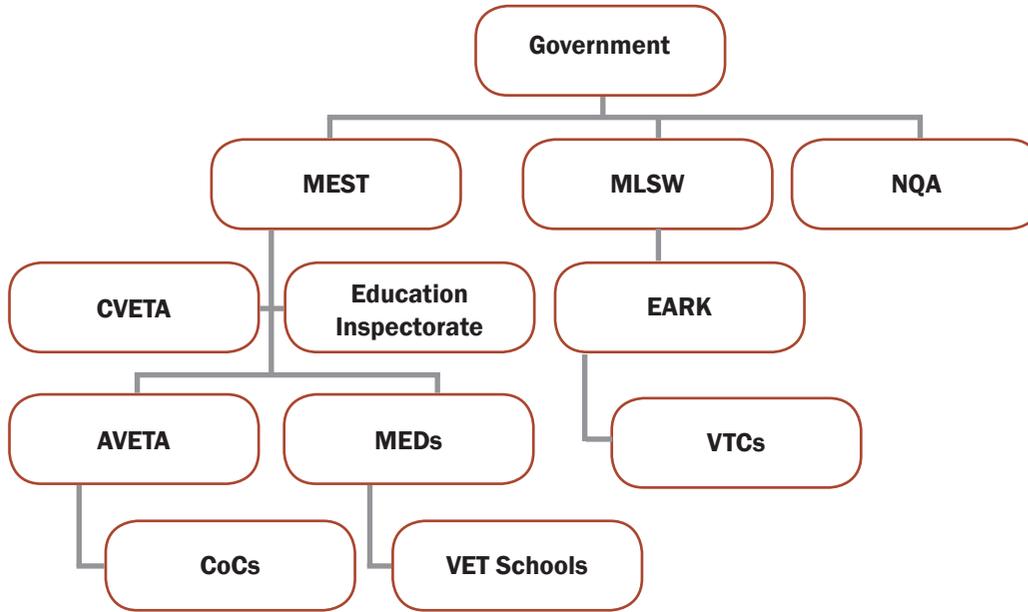


Figure 2. Hierarchical structure for the management of the VET system in Kosovo (Source: ETF, Policies for human capital development in Kosovo, 2019,)

One of the most important actors for the governance and management of VET is National Qualifications Authority (NQA), who has introduced National Qualifications Framework in Kosovo and although as an authority is independent of governmental structures, it has a special importance in managing and controlling the quality of VET providers. Undoubtedly, the introduction and implementation of the National Qualifications Framework (NQF), led by the National Qualifications Authority, has brought supportive and practical measures and instruments towards improved quality of private and public providers of vocational education and training. Its framework is a comprehensive lifelong learning framework and it is intended to serve to all types of learning contexts and experiences. According to National Qualifications Handbook from 2011<sup>7</sup>, there are six specified types of qualification recognized in the NQF; whereas the responsibility on the operational management of the framework is divided between three institutions (see Figure 3):

- a) higher education qualifications under the institutional responsibility of the higher

<sup>7</sup> NQF Handbook from 2011 was the official document in place during the period when the assessment was conducted

- education accreditation agency (Kosovo Accreditation Agency), although to date KAA accredits only academic programs and HEIs and not qualifications;
- b) general education qualifications under the institutional responsibility of MEST;
  - c) national combined VET/general qualifications under the institutional responsibility of the NQA;
  - d) national vocational qualifications under the institutional responsibility of the NQA;
  - e) qualifications based on international standards under the institutional responsibility of the NQA;
  - f) tailored qualifications under the institutional responsibility of the NQA;

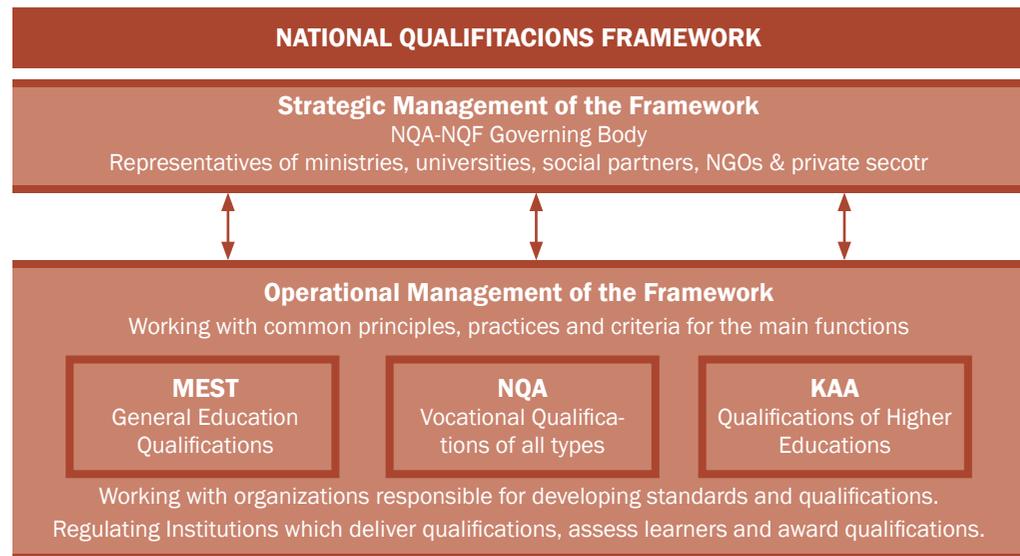


Figure 3. Management of the National Qualifications Framework, (source: EQF Referencing Report of Kosovo 2016)

However, the measures taken by this authority are not always supported by the relevant institutions. This has been shown also during the accreditation process of public vocational upper secondary schools. The objective to introduce and implement the accreditation process among vocational upper secondary schools in the public sector has not been fulfilled. This stagnation continues to be reflected in the progress report that the European Commission issues on an annual basis<sup>8</sup>.

8. Kosovo Progress Report 2019, <http://mei-ks.net/repository/docs/kosovo-report.pdf>

More specifically, NQA'S role is to:

1. define the types and levels of certificates and diplomas, which will be included in NQF;
2. approve the proposed qualifications for inclusion in the NQF (approve standards arrangements, assessment and certification, for each qualification in NQF);
3. accredit and monitor assessment bodies;
4. withdraw the accreditation from irresponsible VETIs or assessment bodies, if necessary
5. conduct external quality assurance of VETIs, leading to the award of qualifications at NQF;
6. handle/appeals by candidates regarding controversial decisions of assessment;
7. approve the certificates and diplomas, issued for the qualifications included in the NQF;
8. maintain database and verifiable documentary evidence of qualifications in the NQF, certificates and diplomas awarded;

The Kosovo Qualifications Framework ensures transparency of the system, progression, mobility, etc. It is very important for the government since it aims to improve the quality of the education and training system and to drive it towards EU standards. Kosovo Qualifications Framework is considered as a reform instrument and is perceived as a key tool in building and structuring the national education system through initiating and stimulating curricula and qualifications re-design and promoting institutional change.

## 5. EU trends and processes – country case study

The main purpose of EQF is to make qualifications more readable, understandable and comparable across different countries and systems. This is important to support cross-border mobility of learners and workers and lifelong learning across Europe. The EQF is composed of its eight reference levels defined through 3 domains in terms of learning outcomes, i.e. Knowledge, skills and autonomy-responsibility.<sup>9</sup>

According to the 'Global inventory of regional and country national qualifications framework 2019'<sup>10</sup> report, the main global trends and findings across 97 different National Qualifications Framework are:

- Trends, such as internationalization, digitalization, migration and mobility, are changing the education and qualifications system, as we know them.
- Digital learning is spreading across the world, changing the relationship between the formal/traditional qualifications and digital credentials.
- The learning outcomes concept (skills and knowledge that learners acquire as a result of learning) is becoming a common basis for almost all national and regional qualifications frameworks worldwide.
- The spread of NQF has helped the validation and recognition of knowledge, skills and competencies acquired in a non-formal setting.
- Qualifications frameworks and reform, have contributed greater transparency of qualification systems and better access to lifelong learning opportunities.
- An important challenge for the coming years is for NQFs to keep up with digitalisation, establishing trust across national and regional borders.

Each country has adapted the NQF system on its own context. Below you can find an overview from four European countries, on how they implement validation of qualifications and accreditation of institutions function as part of NQFs with the focus in formal VET education. The selection of the countries has been made based on their education system history but also by their geographical position.

**IRELAND:** In Ireland, the National Framework of Qualifications (NFQ) was introduced in

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9. <https://www.cedefop.europa.eu/en/events-and-projects/projects/european-qualifications-framework-efq>

10. Global inventory of regional and country national qualifications framework 2019. Volume 2, [https://www.cedefop.europa.eu/files/2225\\_en.pdf#page=199&zoom=100,0,0](https://www.cedefop.europa.eu/files/2225_en.pdf#page=199&zoom=100,0,0)

2003. It consists of ten levels. Quality and Qualifications Ireland (QQI) is an integrated agency responsible for quality and qualifications, including the validation of programmes in Ireland. Within the Ireland education system, there are no initial VET programs offered as part of lower and upper secondary education. Therefore, according to the legal act, the post primary education and training providers (NVQ level 3, 4 and 5/EQF level 2, 3 and 4) are not obliged to submit their programmes to QQI for validation<sup>11</sup>. State Examinations Commission (SEC) undertakes the validation for the indicated levels. The QQI makes awards in further higher education and training. The VET programs start to be offered after the secondary education under NFQ level 6/EQF level 5 through apprenticeship schemes, traineeship, etc. Therefore, validation of these qualifications it is necessary.

In particular, the QA procedures must be approved before a formal application for validation can be made. According to QQI, prior to application for validation, a provider of education and training must have:

1. Established procedures for quality assurance
2. Established procedures for access, transfer and progression
3. Arrangements for the protection of enrolled learners; and
4. Consulted the person, if the programme is offered by another provider;

If the validated programme can be offered in multiple locations (centres), it must have QQI approved quality assurance procedures that cover all of the centres. Arrangements for the validation of non-formal and informal learning, linked to the NFQ and leading to full or partial qualifications and/or giving access to education and training programmes, are in place in all education and training sub-sectors except general education. Learners can achieve entry to a programme through RPL, and can gain exemptions within a programme, gain credit towards an award and attain an award. As a conclusion QQI does not validate programmes neither, accredit institutions under the public formal education.

**ESTONIA<sup>12</sup>:** Most VET is provided at upper secondary (level 3, 4 EstQF=level 3, 4 EQF) and post-secondary levels (level 5 EstQF 5=level 5 EQF). VET programmes are also available for learners without completed basic education. Almost 80% of VET schools are owned by the State. There are also private and municipal VET schools. The Vocational Educational Institutions offer initial and continuing VET. Formal VET leads to four qualification levels (EstQF 2 to 5), continues VET to 2 qualifications (EstQF 4 and 5), while non-formal adult VET courses are provided by VET institutions. Non-formal training is mainly provided by more than 600 private training centres that form a large part of the adult education sector,

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11. Policies and criteria for the validation of programmes of education and training, [https://www.qqi.ie/Publications/Publications/Initial\\_Validation\\_policy\\_7\\_10\\_13.pdf](https://www.qqi.ie/Publications/Publications/Initial_Validation_policy_7_10_13.pdf)

12. Vocational education and training in Estonia, [https://www.cedefop.europa.eu/files/4155\\_en.pdf](https://www.cedefop.europa.eu/files/4155_en.pdf)

but also by VET schools, professional higher education institutions and universities. Initial and continuing VET qualifications are based on professional (occupational) standards that are part of the professional qualifications system.

An eight-level Estonian Qualification Framework (EstQF) was established in 2008. Only state recognised qualifications are included into the EstQF. Two types of State-recognised qualification are included in the EstQF:

- a) Formal education qualifications, awarded after completion of educational programmes at all levels (general, vocational and higher education);
- b) Occupational qualifications, where individuals are issued a professional certificate, giving the evidence of knowledge, skills and competences required for working in a specific occupation or profession.

The framework includes all State-recognised qualifications, which have to meet two basic criteria: to be defined in learning-outcomes-based qualifications standards (curriculum or professional standards) and to be awarded by nationally accredited institutions.

Ministry of Education is responsible for developing the qualifications system. This task is delegated to the qualifications authority (Kutsekoda), a private foundation led by a council comprising representatives of main stakeholders. Kutsekoda organises and coordinates the activities of professional councils and keeps the register of professional qualifications. Professional councils select awarding bodies (public and private) to organise the assessment of competences and issue qualifications. The awarding bodies are selected for five years through a public competition organised by the qualification's authority. VET providers may also be given the right to award qualifications, if the curriculum of the institution complies with the professional standard and is nationally recognised. Qualifications are entered into the register of professional qualifications<sup>13</sup>.

The permission to provide initial and continuing VET in the curriculum group<sup>14</sup> is granted to a school for three years. The education minister decides the granting of this right on the basis of documents submitted by the school, the results of external assessment by an expert committee, and additional evidence, if necessary (Cedefop ReferNet Estonia, 2014). To extend this right, the curriculum group must be accredited. Accreditation comprises external evaluation of curriculum groups at schools, based on their internal evaluation reports and assessment conducted by an external committee. Accreditation is organised by the Quality Agency for Higher and Vocational Education (EKKA). The education ministry, as the owner of VET schools, evaluates the reports in the light of strategic development

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13. Kutsekoda, <http://www.kutsekoda.ee/en/kutseregister>

14. Curriculum group is sector related groups within the VET schools

planning at provider and system level. The quality evaluation council, appointed by the education minister, works under the auspices of EKKA and comprises 13 members, representing stakeholders. It approves accreditation decisions and makes proposals on the extension of the right to provide instruction. Based on the council proposal, the education minister can extend accreditation for three or six years, or refuse to extend it. VET schools can receive free training and counselling according to the outcomes of the external evaluation.

In 2006, internal evaluation of education institutions became mandatory. VET providers constantly (formally at least every three years) conduct an internal evaluation of each curriculum group and draft a report. Since 2013, EKKA has consulted them on this process. Internal evaluation is linked to provider development plans, which are drafted following the performance analysis. As a conclusion, validation and accreditation as part of QA mechanism of public VETIs, is realized by the Ministry of Education.

**SLOVENIA<sup>15</sup>:** Formal vocational education and training (VET) in Slovenia starts at upper secondary level and is provided mainly by public schools. The Ministry of Education, Science and Sport is solely responsible for preparing legislation, financing, and adopting programmes, standards and qualifications. While the education ministry deals with VET at systemic level, the Institute of the Republic of Slovenia for VET (CPI) is responsible for VET at the practical level; it monitors and guides the development of VET, provides in-service teacher training and vocational standards. The CPI also acts as a link between ministries, schools and social partners.

After completing compulsory basic education, VET students can enroll in upper secondary programmes (SQF 4& 5/EQF 4). Adults can enroll in the same formal VET programmes as young people. Organization and means of assessing knowledge are adjusted to suit an adult learner. The national vocational qualifications (NVQ) system is intended for adults over 18 who would like to verify the knowledge gained outside formal education. The system has been in place since 2000<sup>16</sup>.

The Slovenian Qualifications Framework (SQF) represents a unified system of qualifications in the Republic of Slovenia for the classification of qualifications into levels with regard to learning outcomes. It consists of 10 levels<sup>17</sup>. The Institute of the Republic of Slovenia for Vocational Education and Training (CPI), is responsible for the quality assurance system in the field of vocational education and training and National Vocational Qualifications (NVQ);

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15. *Vocational Education and training in Slovenia 2016*, referent cedefop [https://cumulus.cedefop.europa.eu/files/vetelib/2016/2016\\_CR\\_SI.pdf](https://cumulus.cedefop.europa.eu/files/vetelib/2016/2016_CR_SI.pdf)

16. *Spotlight on VET Slovenia, 2017*, [https://www.cedefop.europa.eu/files/8122\\_en.pdf](https://www.cedefop.europa.eu/files/8122_en.pdf)

17. *Slovenian Qualifications Framework*, <https://www.nok.si/en/>

The quality of the Slovenian Qualifications Framework (SQF) also depends on the quality of the system of education and qualifications. The quality of the system of education and qualifications is, however, crucially dependent on established, high-quality accreditation procedures and systems of quality assurance. In Slovenia, these two elements – accreditation procedures and quality assurance systems – together provide integrated oversight of the quality of the education system and the quality of its outcomes.

In the national vocational qualifications system, the CPI carries out evaluation of the NVQ system.

Only those qualifications that go through formal accreditation procedures are automatically included in the SQF. Accreditation procedures currently only exist for two types of qualifications:

- those obtained within the formal education system (educational qualifications); Placement of an education qualification into SQF level is determined by the educational or study programme. The minister, responsible for education, adopts the SQF level for an individual education together with the educational programme, on the proposal of the competent Expert Council of the Republic of Slovenia;<sup>18</sup>
- outside the formal education system, these procedures only exist for national vocational qualifications<sup>19</sup>; Placement of vocational qualifications into SQF levels is determined by the NVQ catalogue, the vocational further training programme or the study programme for further training<sup>17</sup>.

Educational qualification means the outcome of formal education and denotes the level and field of the formal qualification an individual has obtained. A certificate or diploma/degree is awarded as proof of qualification. Vocational qualification means a qualification obtained under the national vocational qualifications (hereinafter: NVQ) procedure, under vocational and technical training and development programmes and under study programmes for continuing education; Supplementary qualification means a qualification that supplements an individual's competence at the level attained and in a specific professional field, and is tied to the needs of the labour market<sup>20</sup>.

Slovenia has a clear validation of non-formal learning policy. In VET, there are two main (legally regulated) routes to the recognition of non-formally and informally acquired knowledge for the purpose of: (a) further participation in formal education and (b) recognition of occupational competences in the labour market (the NVQ system). In the process of rec-

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18. Slovenian Qualifications Framework brochure, [https://www.nok.si/sites/www.nok.si/files/documents/sokbrosura\\_strokovna\\_155x295\\_eng\\_potrditev2.pdf](https://www.nok.si/sites/www.nok.si/files/documents/sokbrosura_strokovna_155x295_eng_potrditev2.pdf)

19. Note: National qualifications are qualifications offered for adults above age of 18;

20. <http://www.nok.si/>

ognising non-formally acquired knowledge through evaluation, the skills and competences of an individual are compared with the skills and competences in the standards of knowledge. If the aim is the recognition of the occupational competencies on the labour market, then a formalized system of national vocational qualifications is used – in this case, the knowledge and experience gained by candidate is compared to the occupational standards defined at the national level. Finally, we can conclude that VET formal education programmes are included to SNQ by the Ministry of Education. Only non-formal programmes/national vocational qualifications need to undergo through validation and accreditation.

**NETHERLANDS:** The Dutch qualifications framework (NLQF) is a framework for the classification of all possible qualifications in the Netherlands, from basic education to a PhD doctorate and is now in an early operational stage. NLQF makes it possible to compare formally regulated qualifications to non-formal qualifications (often provided by private institutions).

The framework consists of eight levels and one entry level. Each of the 8 levels is defined by a set of descriptors indicating the learning outcomes relevant to qualifications at that level. The levels are based on descriptions of what someone knows and is able to do after completion of a learning process, regardless of where and, to an extent, in what timeframe this took place. These descriptions of the levels of knowledge, skills, autonomy and responsibility are referred to as learning outcomes<sup>21</sup>.

The Ministry of Education, through the education inspectorate and VET providers themselves, is responsible for quality assurance in upper secondary VET (level 4 & 4+ NIQF/level 4 EQF). The VET law mandates VET providers to set up a quality assurance system. They are relatively free to design and implement their systems, but have to ensure regular quality assessments that include the arrangements in place for Vocational education and training in the Netherlands. Upper secondary VET institutions' annual reports are the basis for external quality evaluation by the education inspectorate.

The consensus is that while upper secondary VET is of good basic quality, there is a need to be more ambitious. Extra (partly performance based) funding is foreseen for the coming years to increase quality; the responsible minister has concluded quality agreements with all VET institutions, which makes them responsible and accountable for their performance.<sup>22</sup>

Looking at the above-described cases it can be concluded that not all countries have es-

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21. <https://nlqf.nl/english>

22. Vocational Education and Training in Netherlands, [https://www.cedefop.europa.eu/files/4142\\_en.pdf](https://www.cedefop.europa.eu/files/4142_en.pdf)

established a uniform system of NQFs within their countries. The countries have established the system through adopting it to their context by considering existing institutions and trying to complement and fulfill the uncovered functions. Below are listed conclusions from each country:

- In Ireland, QQI does not validate programmes, neither accredit institutions under the public formal education, since VET is not provided by upper secondary schools.
- In Estonia Kutsekoda (a private foundation) organises and coordinates the activities of professional councils and keeps the register of professional qualifications, while as the Accreditation is organised by the Quality Agency for Higher and Vocational Education (EKKA)<sup>23</sup>, which recommends the decision to the Minister of the Education. The Ministry of Education has the final say for accreditation of VET institutions.
- In Slovenia the national vocational qualifications (NVQ) system is intended for adults, over 18 who would like to verify the knowledge gained outside formal education. The system has been in place since 2000<sup>24</sup>. The formal Vocational Education programmes are included in the SQF by the Ministry of Education on the proposal of the competent Expert Council of the Republic of Slovenia. Only the National Vocational Qualifications, which are obtained outside the formal education system should undergo through validation and accreditation procedure.
- While as in Netherlands, the quality assurance system is quite liberal. The Ministry of Education through the Education Inspectorate and VET providers itself are responsible for quality assurance of the upper secondary VET. Extra performance based funding is foreseen for the coming years to increase the quality. Through this funding, the VET Institutions will become responsible and accountable for their performance.

Finally, we can conclude that in all the above mentioned countries VET formal programmes do not need to go through validation, but only non-formal programmes need to undergo through validation. Moreover the findings emphasize the strong trust and accountability the countries have within their formal VET Education system.

Based on the research findings, it would be **recommendable** for Kosovo to further **explore** QA systems for formal VET from Estonia and Netherlands. Both models differ from one-another. While the former is more centrally controlled by the Ministry of Education, the latter provides autonomy to the VET schools and plans to incentivize them in order to make VET schools self-accountable on QA. As a conclusion, the main message, which can be drawn by different cases, is showing that it is not that the procedures matter, but the outcome reached, and the main outcome is to offer qualifications that respond to the needs of the labour market

23. *External assessment of VET IN Estonia*, <https://ekka.edu.ee/en/external-assessment-vet-estonia/>

24. *Spotlight on VET Slovenia, 2017*, [https://www.cedefop.europa.eu/files/8122\\_en.pdf](https://www.cedefop.europa.eu/files/8122_en.pdf)

## 6. National Policy

Looking at the current strategies, a certain attention has been put on NQF. National related strategies related to NQF are:

**National Development Strategy (NDS)<sup>25</sup> 2016-2021** has been adopted by the government of Kosovo in 2016. The document aims to address key obstacles to sustainable economic development through coordination of development policies and institutional processes. The first pillar under this document is development of Human Capital. The planned interventions under this pillar are: 1) enhancing the quality of teaching and learning in school's system; 2) linking education programmes with the labour market demands; 3) improving testing, inspection and accreditation in the education sector; 4) optimising expenditures in education by advancing data collection systems; 5) addressing informal employment and creating adequate working conditions for employees. According to NDS more emphasis should be put to the development of occupational standards to improve the correlation between the Vocational Education and Training and labour market needs and also in improving the quality of education at all levels to increase the number of accredited education and training institutions.

**Kosovo Education Strategic Plan (KESP) 2017-2021<sup>26</sup>** has been adopted by the Government of Kosovo in 2016. This strategic plan is the basic document for the development of the education sector in Kosovo in the period 2017-2021.

The strategy has foreseen number of measures to improve the governance and increase the quality of education in general through introducing a quality assurance system in pre-university education, developing teaching and learning (including curriculum reform and textbook development). The main challenges to be addressed in this field of Vocational Education and Training are: 1) Non-compliance of VET programmes with labour market requirements; 2) Difficulties in provision of teaching materials for VET; 3) Lack of VET core curriculum; 4) Serious flaws in internship and professional practice; 5) Lack of career guidance and counselling. Under the objective: Harmonizing vocational education and training with labour market requirements in the country and abroad, and creating an open system for adult education, one of the expected results envisaged is: VET and adult education curricula are aligned with the requirements of the Pre-University Education Curriculum Framework and the National Qualifications Framework;

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25. *National Development Strategy 2016-2021*, [http://www.kryeministri-ks.net/repository/docs/National\\_Development\\_Strategy\\_2016-2021\\_ENG.pdf](http://www.kryeministri-ks.net/repository/docs/National_Development_Strategy_2016-2021_ENG.pdf)

26. *Kosovo Education Strategic Plan 2017-2021*, <https://masht.rks-gov.net/uploads/2017/02/20161006-kesp-2017-2021-1.pdf>

**Quality Assurance Strategy for Kosovo Pre-University Education 2016-2021<sup>27</sup>** -The Government of the Republic of Kosovo approved the “Quality Assurance Strategy 2016-2020” in December 2015. The aim of this strategy is to introduce measures and practices of quality development in Kosovo’s pre-university education sub-sector. The foreseen mechanisms to be introduced are combination of the school self-assessment and external evaluation, the advancement in school development planning and introduction of dedicated quality assurance coordinator to facilitate the work around the quality development. Based on the strategy, every school should appoint a school-based quality coordinator and ensure necessary arrangements to introduce such a practice.

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27. *Quality Assurance Strategy for Kosovo Pre-University Education 2016-2021*, <https://masht.rks-gov.net/uploads/2016/12/qa-strategy-final-english.pdf>

## 7. Institutional Framework

Institutional Framework regarding Vocational Education and Training with the focus in Validation and Accreditation process is shared between number of stakeholders:

**National Qualification Authority (NQA)<sup>28</sup>:** National Qualifications Authority is an independent public body, in accordance with National Qualifications Law in Kosovo. NQA was established by the Ministry of Education, Science and Technology (MEST), and acts in agreement with the Office of the Prime Minister and other relevant ministries. Its responsibility is oversight of national qualifications along with the Ministry of Education, Science and Technology, Agency for Accreditation and other professional bodies, approved for this purpose with the government decision, in particular, is responsible for professional qualifications. The NQA's mission is to oversee and develop the National Qualifications Framework in the context of lifelong learning in partnership with the student / candidate, employer and provider of Vocational Education and Training at all levels and in compliance with demand needs of society and economy. The NQA's vision is to create a quality, reliable and transparent national qualifications system in order to increase the opportunities for national and international mobility.

**Ministry of Education and Science (MES)** is responsible for overall education policy and legislation, including VET, higher education and life-long learning. MEST is responsible for quality assurance in general education by as projected in the law on pre-university education. In relation to NQF, MES oversees higher education provision and develops school –level qualifications, such as qualifications of general education and VET curricula.

**Agency for Vocational Education and Training and for Adults (AVETA)** according to the VET Law<sup>29</sup> is responsible for administration and leadership of Institutions of Vocational Education Training and for Adults in setting strategic priorities and curricula. The role and function of AVETA is defined by the VET Law Nr.04/L/138, and the administrative instruction 14/2014, as well the AI 05/2012 for the Competence Centers. Moreover, it has a role in teacher training as well as in coordination development of the occupational standards. AVETA currently manages six such VET institutions (schools-CoCs). Its relationship with the NQA and other actors needs to be clarified as the agency develops (AVETA).

**Ministry of Labour and Social Welfare (MLSW)** manages eight Vocational Training Centers, through Employment Agency of Republic of Kosovo (EARK). Among others, MLSW is

28. National Qualifications Authority, <https://akkks.rks-gov.net/en/nqa/about-us>

29. Law No. 04/L-183 on the Vocational Education and Training, <https://masht.rks-gov.net/uploads/2015/06/ligji-per-afesimin-profesional-2013-eng.pdf>

expected to conduct analyses of the labour market needs and support the MEST, in planning to meet the needs for vocational education and training. In addition, MLSW, in cooperation with Kosovo Agency of Statistics, is responsible for classification of occupations.

**The Kosovo Accreditation Agency (KAA)** oversees higher education provision and accredits higher education institutions as providers. While Universities develop their own qualifications, KAA's role to assure quality. In addition to its main role, it is responsible for accrediting post-secondary VET colleges.

**Council for Vocational Education and Training and Adult Education (CVETAE)** is an advisory body to MEST. The 2006 Law on VET<sup>30</sup> provided for the establishment of CVETAE. The Council was then set up a year later and functioned sporadically until 2012. It was re-established in 2014, based on the new VET law<sup>28</sup> approved in 2013. Among others, CVETAE advises the MEST on the general direction for vocational education and training and adults' education policy in Kosovo and its statutory responsibility is to propose and approve occupational standards<sup>31</sup>. Although the Council was not operational since 2014, primarily because its members were not compensated for their service, Ministry of Education and Science has recently undertaken steps to reactivate the CVETA by sending invitations to respective institutions to appoint their representatives. The first meeting has been already carried.

**Education Inspectorate** is the central executive body for legal oversight and control, as well as the quality assurance. The Inspectorate: (i) evaluates the quality of educational institution/service; (ii) controls the compliance of the educational institutions activity with the applicable legal and bylaw acts; (iii) advises the leaders and employees of educational institutions; (iv) informs the Minister, MEDs and educational institutions about findings of inspection and publishes them annually.

According to the institutional framework, NQA and Education Inspectorate are responsible for QA within the Vocational Schools. Although Education Inspectorate is responsible for quality control( performance assessment of the teachers, director and deputy director) and external evaluation of the education institutions of the ISCED level 0-4, which includes vocational schools, the external quality assurance in VET is the responsibility of NQA<sup>32</sup> rather than of Education Inspectorate. Although this is regulated through the Law No. 03/L-060 on National Qualifications<sup>25</sup> and Law No. 06/L-046 on Education Inspectorate in the Republic of Kosovo<sup>33</sup>, both laws need further clarification in terms of division of tasks.

30. Law No. 02/L-42 on Vocational Education and Training, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=8676>

31. MEST Administrative Instruction on verification of occupational standards 28/2014, <https://masht.rks-gov.net/uploads/2015/05/ua-nr-28-2014-1.pdf>

32. MEST Administrative Instruction on Quality Assurance in VETIs No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

33. Law No. 06/L-046 on Education Inspectorate in the Republic of Kosovo, <https://gzk.rks-gov.net/ActDocument->

## 8. Legal framework

In terms of legal framework, despite NQF Law, three additional laws interact directly to validation and accreditation procedures of VETIs:

Law No. 03/L-060 on National Qualifications<sup>34</sup>, establishes a national qualifications system based on a National Qualifications Framework (NQF) regulated by the National Qualifications Authority (NQA); Specifically this law defines the procedures for validation/approval of qualifications and accreditation of institutions;

- Law No. 04 /L-138-2013 for Vocational Education and Training<sup>21</sup> defines qualification standards, relating to entry level and several other definitions (student, diploma, etc.)
- Law No. 04/L-143 on adult education and training<sup>35</sup> defines certification as well as informal and non-formal training; regulates the governance and financing of the adult education and training in Kosovo;
- Law No. 06/L-046 on Education Inspectorate in the Republic of Kosovo<sup>36</sup> determines authority, responsibilities and organisation of the Education Inspectorate in the Republic of Kosovo;

An extensive number of administrative Instructions complements these laws. The most important ones that need to be stated due to their linkage to NQF implementation are:

- Administrative Instruction No 28/2014<sup>37</sup> on criteria and procedures for the verification of the occupational standards;
- Administrative Instruction No 35/2014<sup>38</sup> on criteria and procedures for the validation and approval of qualification and accreditation of institutions providing qualifications in Kosovo;
- Administrative Instruction No 31/2014<sup>39</sup> for prior learning recognition;

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[Detail.aspx?ActID=17744](#)

34. Law no. 03/L-060 on National Qualifications, <https://masht.rks-gov.net/uploads/2015/06/11-ligji-kualifikimeve-2008-03-l-060-en.pdf>

35. Law NO. 04/L-143 on Adult Education, <https://masht.rks-gov.net/uploads/2015/06/ligji-per-arsimin-dhe-aftesimin-per-te-rritur-ne-republiken-e-kosoves-2013-eng.pdf>

36. Law No. 06/L-046 on Education Inspectorate in the Republic of Kosovo, <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=17744>

37. Administrative Instruction 28/2014 on procedures for verification of occupational standards, <https://masht.rks-gov.net/uploads/2015/05/ua-nr-28-2014-1.pdf>

38. Administrative Instruction 35/2014 on criteria for validation and accreditation, [https://akkks.rks-gov.net/uploads/ua\\_35-2014\\_per\\_kriteret\\_dhe\\_procedurat\\_per\\_validimin\\_dhe\\_aprovimin\\_e\\_kualifikimeve\\_kombetare\\_dhe\\_akreditimin\\_e\\_institucioneve\\_qe\\_ofrojne\\_kualifikime\\_ne\\_kosove.pdf](https://akkks.rks-gov.net/uploads/ua_35-2014_per_kriteret_dhe_procedurat_per_validimin_dhe_aprovimin_e_kualifikimeve_kombetare_dhe_akreditimin_e_institucioneve_qe_ofrojne_kualifikime_ne_kosove.pdf)

39. Administrative Instruction 31/2014 for prior learning, [https://akkks.rks-gov.net/uploads/ua\\_31-2014\\_per\\_njohjen\\_e\\_mesimit\\_paraprak.pdf](https://akkks.rks-gov.net/uploads/ua_31-2014_per_njohjen_e_mesimit_paraprak.pdf)

- Administrative Instruction No 32/2014<sup>40</sup> on criteria and procedures for quality assurance in VET institutions internal processes;

Law<sup>41</sup> (under article 14 and 15) defines clearly the accreditation of assessment bodies/institutions, which is not the case regarding the validation of the qualifications procedure. Three main laws<sup>31 42 43</sup> do not describe the validation procedure. The procedure is described through National Qualifications Framework document and the Administrative Instruction<sup>29</sup>, whose legal base is the Law no. 03/L-060 on National Qualifications<sup>44</sup>.

In the NQA Law, the term approval of qualifications is elaborated, while as in the LAW No. 04/L-138 for Vocational Education and Training and LAW NO. 04/L-143 on adults' education and training in the Republic of Kosovo the term is not mentioned at all. The only formulation related to validation can be found under the LAW NO. 04/L-143 on adults' education and training<sup>34</sup> that obliges VET adult programs to undergo through the validation and accreditation process.

In addition, Law no. 03/L-060 on National Qualifications<sup>35</sup> delegates to NQA the task for definition of criteria for registration of Qualifications and modules of Vocational Education and Training in the NQF. Based on this requirement, NQA came-up with the Administrative Instruction<sup>29</sup> on criteria and procedures for the validation and approval of qualification and accreditation of institutions providing qualifications in Kosovo;

Moreover, discussions and clarifications should be made also in terms of the administrative instruction<sup>45</sup> with the one from 2016<sup>46</sup> related to QA coordinator, which creates confusion within VET schools. Some VET schools are following the one from 2016 but they think that they cannot be treated same as other schools, since Vocational Schools are more complex and QA Coordinators need more time and trainings for the implementation. According to

40. Administrative Instruction on Quality Assurance in PreUniversity Education institutions No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

41. Law no. 03/L-060 on National Qualifications, <https://masht.rks-gov.net/uploads/2015/06/11-ligji-kualifikimeve-2008-03-l-060-en.pdf>

42. Law No. 04/L-183 on the Vocational Education and Training, <https://masht.rks-gov.net/uploads/2015/06/ligji-per-afesimin-profesional-2013-eng.pdf>

43. Law NO. 04/L-143 on Adult Education, <https://masht.rks-gov.net/uploads/2015/06/ligji-per-arsimin-dhe-afesimin-per-te-rritur-ne-republiken-e-kosoves-2013-eng.pdf>

44. Law no. 03/L-060 on National Qualifications, <https://masht.rks-gov.net/uploads/2015/06/11-ligji-kualifikimeve-2008-03-l-060-en.pdf>

45. MEST Administrative Instruction on Quality Assurance in VETIs No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

46. Administrative instruction 24/2016 on Quality assurance on Pre-University Education, <https://masht.rks-gov.net/uploads/2016/12/rotatedpdf180.pdf>

the administrative instruction<sup>47</sup>, QA Coordinators in Pre-University Education allocate their time on QA tasks based on the number of school students. However, this regulation states that QA in VETIs should be regulated with a separate Administrative Instruction. If we look at Administrative Instruction<sup>48</sup> there is no time allocation mentioned for QA coordinator. Based on findings from the interviews, this inconsistency has created problems within the Vocational Schools, since they do not know which Administrative Instruction they should follow<sup>49</sup>. While in VTCs, the coordinators engage only four hours per week for QA related tasks.

The lack of clarity within the legal framework should be addressed during the already planned revision of legal framework by MES. Prior to the review of the legislation, MES should discuss widely with all involved stakeholders about the validation of qualifications procedure, roles of institutions and other mechanisms related to the validation of qualifications. The points that derived from findings and represent issues that need to be further discussed are:

- Should public Vocational Schools undergo through accreditation procedure?
- Should the validated/approved qualification which underwent through validation procedure count as approved qualification for all public Vocational Schools where it is being offered? Same question applies for validation of qualifications under the Vocational Training Centers?
- Should the application fees be reconsidered?
- Should public VETIs undergo through accreditation procedure?

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47. Administrative Instruction on Quality Assurance in PreUniversity Education institutions No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

48. MEST Administrative Instruction on Quality Assurance in VETIs No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

49. Conclusion drawn based on the interviews conducted with Vocational Schools;

## 9. Validation and accreditation procedure, findings and recommendations

VET qualifications are included in the NQF, through a validation mechanism developed and managed by NQA. The mechanism consists of procedures for validating and approval of qualifications, their inclusion at the levels of the framework, and criteria and processes for accreditation of the providers to offer these qualifications.

According to the Administrative Instruction<sup>50</sup> each institution that is willing to offer a qualification or a module, should apply for validation of the respective qualification or module. The validation process can be done at the same time when the accreditation of the institutions is done or separately. The process consists of four phases. In phase one the institution, which seeks validation of the qualification undergoes through the application process. In the application, VETIs should describe the rationale for the qualification. In the phase two, the panel of experts appointed by NQA with support of NQA officer evaluate the application, write the report and provide the draft report to the applicant in case they need to provide additional explanations to the report. During phase three, the experts submit the report and recommendations to the Steering Board for the final decision and in the last phase, the approved qualifications are included in the NQF and made public. The decisions on which level the qualification should be placed is made on the basis of their match against level descriptors. The certain procedure for validation of qualification should not exceed a period of six month starting from the date of the application. During the application process, the proposed qualifications for validation must provide the following information:

- c) Rationale/justification,
- d) Credit value and duration
- e) Entry requirements and access
- f) Proposed level of qualification/module in the NQF
- g) Content, outcomes and standards
- h) Assessment , knowledge, skills and competences
- i) Quality assurance arrangements
- j) Progression

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50. Administrative Instruction 35/2014 on criteria for validation and accreditation, [https://akkks.rks-gov.net/uploads/ua\\_35-2014\\_per\\_kriteret\\_dhe\\_procedurat\\_per\\_validimin\\_dhe\\_aprovimin\\_e\\_kualifikimeve\\_kombetare\\_dhe\\_akreditimin\\_e\\_institucioneve\\_qe\\_ofrojne\\_kualifikime\\_ne\\_kosove.pdf](https://akkks.rks-gov.net/uploads/ua_35-2014_per_kriteret_dhe_procedurat_per_validimin_dhe_aprovimin_e_kualifikimeve_kombetare_dhe_akreditimin_e_institucioneve_qe_ofrojne_kualifikime_ne_kosove.pdf)

The criteria for validation of qualifications are grouped based on the specifics of the qualifications, but complementary to the specific criteria there is a set of general criteria which should be fulfilled by the institution for all types of qualifications.

As far it concerns accreditation, based on the Administrative Instruction<sup>41</sup> each institution that wishes to provide qualifications according to NQF, must apply for the accreditation at the NQA.

All VET institutions that provide any qualifications from NQF levels 1-5 have the right to apply. Moreover, the accreditation will be made for specific qualification and it will be granted for certain time of period, after which the institution may request re-accreditation.

**Accreditation procedure consists of four phases:**

**In phase one**, the institution receives information and guidance from NQA and based on that submits the application, self-assessment report and other documents requested by NQA.

During **phase two** NQA selects the expert team, whose task is to review the documentation, visit the institution and compile a report.

**In phase three** the report compiled by the experts is shared with the applicant in order that he can complement the report with additional explanations if any. The report is sent to NQA and based on the report, the Steering Board of NQA takes decision with majority of votes.

During **phase four**, NQA publishes the final decision and issues necessary documentation to the institution.

The whole procedure from application phase to final decision should not exceed 6 months.

According to NQA there are number of criteria that should be fulfilled by the institutions, in order to get accredited. Some of them are:

- a) proper institutions structure which ensures financial stability,
- b) effective approach to evaluation,
- c) documentation and database for the verification of students/candidates achievement,
- d) proper policies and procedures for staff development,
- e) proper policies for the evaluation of candidates with special needs,
- f) systems for recognition and transfer of credits obtained by the candidates,
- g) capacity to fulfill requirements for specific qualifications,
- h) qualification of staff members related to qualification, etc.

In the cases of public providers, the criteria regarding financial stability of the public VETI should be proved by the Institution that is responsible for its financial management, e.g. for VET school, respective MED should provide evidence on the financial stability of the VET school. In regards when the applying institution offers the same qualification in multiple places, the institution has the possibility to pay a reduced fee for accreditation for each another location. The applicant institution has the right to appeal against the decision of Steering Board (SB) of NQA. The complaint can be submitted no later than 15 days after the issuance of SB decision of NQA has been made.

Although according to the Administrative Instruction<sup>51</sup>, both processes can be implemented separately or in parallel, the real implementation practice in the field shows that institutions prefer to undergo through both procedures at the same time. In the following are presented general recommendations<sup>52</sup> and specific recommendations<sup>53</sup> **resulting from the interviews.**

#### **General recommendations:**

- The procedures in relation to the validation of qualifications should be discussed and clarified. Who should approve/validate formal qualifications, MES or NQA? If the qualifications will need to get validated by the NQA, MES should not issue an Administrative Instruction<sup>54</sup> for approval and implementation of the new curricula<sup>55</sup>
- MES cannot afford the payment for validation. The Vocational Schools need to be treated differently in terms of payment. If one qualification of public Vocational Schools is validated, this qualification should be considered as validated for all public Vocational Schools that offer the respective qualification. Throughout this measure, the payment for validation will be lowered.
- NQA should not have **same administrative** requirements for accreditation of public and private VETIs. It should tailor administrative requirements for public VETIs compared to the private ones but in the end, all qualifications should be equivalent to the NQF, e.g. ownership certificate, fiscal number, financial plan, etc<sup>56</sup>.

51. Administrative Instruction 35/2014 on criteria for validation and accreditation, [https://akkks.rks-gov.net/uploads/ua\\_35-2014\\_per\\_kriteret\\_dhe\\_procedurat\\_per\\_validimin\\_dhe\\_aprovimin\\_e\\_kualifikimeve\\_kombetare\\_dhe\\_akreditimin\\_e\\_institucioneve\\_qe\\_ofrojne\\_kualifikime\\_ne\\_kosove.pdf](https://akkks.rks-gov.net/uploads/ua_35-2014_per_kriteret_dhe_procedurat_per_validimin_dhe_aprovimin_e_kualifikimeve_kombetare_dhe_akreditimin_e_institucioneve_qe_ofrojne_kualifikime_ne_kosove.pdf)

52. Recommendations from the interviews with stakeholders;

53. Recommendations from the interviews with 10 VETIs;

54. Administrative instruction for implementation of Vocational Education curricula, *UDHEZIMET ADMINISTRATIVE 2009 | MASH (rks-gov.net)*

55. Interview with acting Director of VET Department

56. Recommendation derives from the interviews

- Although QA procedure is regulated by a procedure through establishment of working groups within each VETI, it has been shown that this is not being implemented in practice. VETI staff members do not support a number of QA Coordinators. MES should monitor and instruct closely VETIs throughout implementation of the QA developed procedure. VETI staff members should support QA Coordinator in the preparation of the documentation for validation and accreditation process, since it is a very demanding process;
- AVETAE should coordinate and share/exchange the validation and accreditation experiences with all Vocational Schools: The sharing of lessons learned will help Vocational Schools to prepare better for the validation and accreditation procedure. It would be beneficial for the schools that apply for the first time to be exposed to the models from the schools that got accreditation.
- NQA should regularly send to schools' feedback on the self-assessment report. According to the legal framework, the schools should prepare and share the self-assessment report with NQA on annual basis in order to get feedback and undertake improvement measures based on the NQA feedback. Self-assessment report is a tool that should help VETIs to self-reflect on their capacities and help them improve their situation.

The Steering Board of NQA preferably should be appointed based on the professional knowledge minimum set criteria by NQA. The criteria set by NQA, will mitigate the risk of having the Steering Board members not enough knowledgeable on the NQF and VET system. In addition, since not all members of Steering Boards possess knowledge on VET and interpretation of technical aspects within the report, it is advisable for Steering Board to have beside its operation pool of experts experienced in VET, which can feed them with explanations if needed. The VET experts will support Steering Board of NQA to check if the reports are meaningful in the technical aspect while they make decisions.

**Below are presented specific recommendations per each implementation phase of validation and accreditation procedure. The findings derive from interviews:**

**Phase I - VET institution submits the application.** VETIs find the application Although NQA has prepared a form with the required documentation to be submitted with the application.

**Vocational Training Center** in general find the requirements during the application phase clear. Some of recommendations that will eliminate the challenges during this phase are:

- NQA should check if the agreement for the use of IT international standard is need-

ed as an evidence, since the IT qualification offered by VTCs belong to level 2 of NQF.

- The external experts should accept the general regulation of VTCs that covers the requirements. The experts should not ask for separate regulations and guides, such as for: health and safety, students' enrolment, issuing of certificates, etc.
- The request for submission of the financial plan should be changed, since in the case of VTCs, EARK-MPMS are in charge for the procurement, whereas VTC can realize only the premeasurement;
- Evaluation experts should accept instructor's qualification related to the qualification. They should consider that the instructors that are engaged for level three should not be engineers.
- NQA should digitalize the application process. The application process requires submission of big number of documentation and through the digitalization the processes will be simplified.

**Vocational Schools** had many complaints on the requirements during the application phase, but from the other side they provided many recommendations, which can contribute in the improvement of the process. Issues to be tackled are:

- NQA should upload in the webpage the filled application templates for validation of qualification and accreditation of institution; Application templates should possess concrete examples in order that the applicants can fill the application; NQA can consider also introduction of an animation that would support the applicants;
- NQA should tailor the list of the required documentation and should provide additional explanation for each required document based on the type of the VETI (public and private). e.g. Some documents should not be requested from the public VETIs (ownership certificate, fiscal number, financial plan) or the provision of arguments why the qualification is needed, since this is elaborated during the process of OS development. In addition, NQA should separate the list of required documentation based on the application of VETI (validation of qualification, accreditation of the VETI or both). Throughout this, VETIs will know exactly what type of documentation they will need to provide;
- NQA should state clearly in the validation application form what kind of curricula model the VETIs should submit during the application process. Preferably, NQA could upload in their webpage an example of the curricula for the applicants. This

measure will help VSs to not get confused with double requirements, from some VSs asking integrated modular curricula and from the rest separate theory and practical modules curricula;

- MES should develop the curricula based on occupational standards and distribute it to all Vocational Schools. The Vocational Schools could not validate qualifications due to lack of revised curricula by MES. MES should provide information on the curricula to all interested Vocational Schools that are willing to apply for validation of qualification and accreditation of the institution;
- MES should prepare and distribute to the schools a ready package of required regulations. The availability of this documentation will facilitate the application process for the schools. Certain required regulation, such as: work regulation, code of conduct, regulation for registration of students, regulation on reporting the incidents, for credit transfer of qualification, confidentiality, safety, etc.), should be prepared by MES and used during the application process by all Vocational Schools;
- MES should regulate the released documentation upon graduation diploma through the admin instruction for final evaluation. Currently, in diploma is indicated the average mark success, while as in the school registry the final examination mark is indicated.
- AVETAE should develop a package of templates to be used by all Vocational Schools, such as template for: financial plan, portfolio, assessment forms and theory tests etc. The VSs can adapt the financial plan template developed by AVETAE.
- Schoolteachers should get trained on the development of teaching materials in order to fill the gap of the missing textbooks for the Vocational Schools. Through this measure, the schools will be able to fulfil the required criterion by NQA until the textbooks are made available.

**PHASE II –NQA engages external experts; the experts evaluate the documentation, visit the institutions and prepare the draft evaluation report;**

- Criteria for the engagement of the external experts should be reviewed according to the relevant legislation for public institutions and measures taken to prevent ambiguity and misinterpretation; Main criteria for should be:
  - experts should come from businesses and other similar VETIs;
  - should have experience in VET and related profile of minimum 5 years.

- NQA should inform in advance the selected external experts on the specifics of each VETI that will be evaluated as well as the qualification level (Vocational School public/private, Vocational Training Center public/private). This measure will decrease the misunderstandings during the evaluation visits at VETIs as well as prepare the experts not to ask for more advanced equipment than needed for the particular qualification. The external evaluators should avoid imposing practices from universities and/or private institutions<sup>57</sup>.
- NQA should inform the experts' priority about their role. They should have a supportive and not controlling role. Moreover, the NQA/experts need to provide more mentoring to the Vocational Schools<sup>58</sup>.
- NQA should prepare a standardized checklist for experts throughout which the experts will know what to check in VETI. The checklist will help also the experts to prepare the report. Through the checklist, NQA will have the possibility to monitor more easily the engagement of experts during the VETI visit but also evaluate VETIs based on same criteria. So far, experience showed that experts were applying different approaches/criteria during the evaluation.

**PHASE III - The draft report with recommendations is sent by NQA back to the VET institution by asking them to provide in a given time additional clarifications if any; The VET institution sends the report with additional clarification back to NQA;**

- The NQA staff should check if external experts have included in the report the additional information/explanation provided by VETIs. In addition, NQA staff should ask VETIs to cc them when they send to experts the reports with additional information. In addition, if experts decide not to take in consideration the explanations provided by VETIs, they should note their decision and explanation in the report. This process might be monitored through development of checklists filled by both parties, through ticking the activities in the checklist. Through this measure, the misunderstandings will be reduced.

**PHASE IV – NQA evaluates the report and publishes the final decision;**

- The NQA should respect timing and deadlines in communicating the decisions made by the Steering Board on the accreditation of VETI or validation of qualification. Moreover, if the decision is negative, it should be backed by arguments. NQA

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57. *The finding derives from the interview*

58. *Ibid*

should not allow negative decisions to be announced without providing feedback and arguments. The arguments will serve VETIs to further improve.

- The NQA should develop a system, which will support them to track the validation and accreditation process from the start until the end. This system will help them track the start, end date, and mitigate delays. Throughout this system, NQA will respect deadlines for the whole process and not exceed the already regulated duration of the process of 6 months;
- NQA should explore possibilities to support Steering Board members through engagement of independent experts that will support them in the interpretation of report. Throughout this measure the Steering Board members will have their decision backed by an expert opinion. This structure will influence reduction of complaints by VETIs, which constantly emphasize that the decision makers cannot understand the specifics of each VETI that applies for accreditation.

## 10. NQA guidelines for validation of qualification

In order to facilitate the implementation of the validation process, NQA possesses guidelines to support the Institutions during the process. Although these guidelines are available in the NQA webpage, the QA coordinators did not refer to them during the interviews. Since guidelines were produced in 2011, it is recommendable to review and simplify them based on the implementation practices. The Guidelines are listed below:

- **Developing Modular Vocational Qualification (2011)**<sup>59</sup>- it is guide that support the institutions during the development process of the qualification, starting from the development of the occupational standards based on labour market needs, than going further to the definition of learning outcomes, than modules that build a qualification up to the assessment process and criteria. The guide is focused in the qualifications that consist of general knowledge, mandatory and optional professional modules.
- **Assessment and Certification in the NQF (2011)**<sup>60</sup>: The document comprises of three parts. The first part explains what an assessment strategy is and how to approach its development; The second part refers to the development of assessment tools appropriate for observation, product examination and questioning, but also to the instruments which allow a transparent collection and judgement of evidence produced by the candidate. The third part is a guideline for registration and certification procedures that should be applied for awarding the credits.
- **Internal verification of assessment for Vocational Qualifications (2011)**<sup>61</sup>: This Practical guide will give additional information on the Internal Verification Process and examples of the “Forms for Evidence” that your institution will need to provide when you are Externally Verified and Monitored. The National Qualifications Handbook provides information on how Education and Training Programmes are to be Assessed and Verified, and the important role of ensuing that these assessments of learners work is of the appropriate standard to achieve the outcomes of the curriculum and to meet the expected “Occupational Standards” required by the Industry Sector.

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59. [https://akkks.rks.gov.net/uploads/developing\\_modular\\_qualifications.pdf](https://akkks.rks.gov.net/uploads/developing_modular_qualifications.pdf)

60. [https://akkks.rks.gov.net/uploads/assessment\\_and\\_certification\\_in\\_the\\_nqf\\_practical\\_guide\\_tool-kit\\_.pdf](https://akkks.rks.gov.net/uploads/assessment_and_certification_in_the_nqf_practical_guide_tool-kit_.pdf)

61. [https://akkks.rks.gov.net/uploads/internal\\_verification\\_of\\_assessments\\_for\\_vocational\\_qualifications\\_practical\\_guide\\_tool-kit\\_.pdf](https://akkks.rks.gov.net/uploads/internal_verification_of_assessments_for_vocational_qualifications_practical_guide_tool-kit_.pdf)

- **Guide to further development of a quality system for external evaluation of VET in Kosovo (2011)**<sup>62</sup>: Describes more in detail the components of Quality System in Kosovo and responsible institutions per each component and solutions for complementing each other's responsibility;
- **Quality Assurance in VET Institutions (2011)**<sup>63</sup>: This "Tool-Kit" is designed to support and assist your School/Training Centre in developing or evolving the "Self-Assessment" process and to produce a good self-assessment report for submission to NQA.
- **Guidelines for Quality Assurance Accredited Institutions to deliver post-secondary VET (2011)**<sup>64</sup>: This document deals with the quality assurance of institutions accredited to deliver post-secondary vocational education and training (VET). Post-secondary is defined as provision up to Level 5. The document makes recommendations in respect of (1) organisation and management of the Institution; (2) management and delivery of quality assurance processes; (3) events and documents of an integrated quality system; (4) self-evaluation, and (5) learner assessment.

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62. [https://akkks.rks-gov.net/uploads/guide\\_for\\_further\\_development\\_of\\_quality\\_syst.pdf](https://akkks.rks-gov.net/uploads/guide_for_further_development_of_quality_syst.pdf)

63. [https://akkks.rks-gov.net/uploads/quality\\_assurance\\_in\\_vet\\_institutions\\_practical\\_guide\\_for\\_implementation.pdf](https://akkks.rks-gov.net/uploads/quality_assurance_in_vet_institutions_practical_guide_for_implementation.pdf)

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## **11. Institutional capacities**

In order to enter to validation and accreditation procedure, VET institutions (VETIs) that wish to apply and NQA, should have appropriate human capacities. The involved institutions should have sufficient human capacities to deal with the processes but moreover the responsible staff members should be prepared for the implementation of the processes. Sections below, present an overview of the findings and recommendations in regards to human capacities.

## 12. Institutional capacities of NQA

In terms of quantity, since its establishment, NQA struggled to ensure the initial planned number of staff, which was 27 employees in total<sup>65</sup>, but due to budget limitations, this was unachievable. NQA started to operate with six staff members: Director, office assistant and a core team of four experts (2 for quality assurance, 1 for occupational standards and 1 responsible for qualifications). In 2019, the number of employees was increased to 10. Digitalization of the processes by NQA will support the staff members to handle the situation more easily and close the gap.

Since their role is mainly in managing, coordinating and administering the procedures during the initial phase, the engaged staff members did not face difficulties. This changed over the time, since although the institution could engage external experts for different verification, evaluation tasks, the core team was facing difficulties since despite the office-work they had to accompany the panel of experts in the field. Since the number of VETIs applying for validation and accreditation is increasing, it will be very hard for the current staff members to respond to the requests coming from VETIs and moreover to monitor the institutions in between the accreditation/reaccreditation periods. Some signals on NQA limited capacities have been already noticed by some VETIs, since some of them did not get feedback on their self-evaluation report, whereas NQA is obliged to send feedback to VETIs for the self-assessment reports on annual basis.

According to the legislation, the final decision on validation of qualifications and accreditation of institutions should be made by the Steering Board of NQA, which is composed of delegated members from different institutions, a decision which cannot be influenced by NQA. The members should go through the compiled reports by the external experts, and based on the reports they should decide on positive/negative response. Interviewed VETIs and representatives from national institutions consider this practice as a very dangerous one, since not all Steering Board members understand the nature and the complexity VETIs<sup>66</sup>. In addition, the feedback from some of the VET providers was that the external engaged experts should be very well informed on the work nature of the VET institutions before they start with the evaluation. In certain cases, the external experts have asked documentation and evidences that did not correspond to the respective VET institution.

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65. Interview with the Director of NQA

66. Interview with Gani Ismajli, EARK

The initial staff members had the chance to participate in different trainings, study visits and conferences, in terms of knowledge capacity building. However, this is not the case with the newly appointed staff members. The exposure to different experiences has increased their knowledge and competencies although their prior working experience is not acquired within any VETI<sup>67</sup>. A number of VETIs were quite satisfied with the support and advises provided by the NQA experienced staff members.

As a response to the situation, an internal training system should be developed throughout which all staff members will have the possibility to increase and update their knowledge and skills related to the responsibilities but moreover new staff members will catch up faster the needed competencies in order to fulfil their responsibilities. The system itself should consist of different training packages, the provision of which can be done through in-house or outsourcing modality. As a result of the interview carried with NQA Director, some of the recommended trainings packages for NQA staff are:

**Leadership Training** will help NQA staff members to build strong communication skills, develop their leadership skills as managers in setting goals and making them accountable, to limit stress, manage conflict and improve their coaching and facilitation skills that will have a positive impact in the performance of their partner institutions.

**Digital literacy training** will support NQA staff members to make best use of the technology to find, use and share information. It will make them understand the importance of privacy, security and assessing the credibility of information and lastly will support them to handle the processes which might be realized through digitalization.

**External experts engaged by NQA** as an external support, currently are not provided with the training, but only with advises by NQA staff members. The external experts should get prepared through info sessions carried by NQA staff. The upfront preparation will mitigate the risk that experts ask questions that are not relevant to the institution.

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67. *The finding derived from the interviews*

## 13. Institutional capacities of VET Institutions

Throughout analysing the responsibilities of quality assurance coordinators in terms of validation and accreditation procedures, it was obvious that they cannot cope alone with all the requested requirements, such as yearly elaboration of self-evaluation report, preparation of evidence-based documentation and different required documentation for the application. The exercise requires the engagement of all staff members. Although the management and staff members from VETIs should provide continuous support to QA coordinators, in some VETIs this is not the case. The reason behind is the lack of awareness by other staff members on the importance of the processes itself. In spite of the fact that according to the related Administrative Instructions the requirement is that each VTC and Vocational School should have a quality assurance coordinator, the dedicated hours of coordinators for the purpose of quality assurance procedures in Vocational Schools are unclear, while as at VTCs are very limited.

During the interviews, it was found that not all QA coordinators underwent through a training related to quality assurance procedure and requirements, and this situation lowered their performance and awareness toward the importance of QA processes. Since VTCs entered in the validation and accreditation process much before than Vocational Schools, it was obvious that more problems were facing Vocational schools compared to VTCs. The delivered trainings were not systematic and based on their needs, but rather ad-hock with no information provided beforehand.

Capacity building for VET institutions staff members is essential in order to succeed in validation and accreditation process. In the following are presented the recommended trainings for the staff members of Vocational Schools and Vocational training Centers.

### Vocational Schools

In order that Vocational Schools become acquitted with validation and accreditation process, they should participate in a training that would present the value of QA process at school level. In addition, more work should be done in preparing the schools for preparation of financial plan. Some of the recommended trainings drawn by interviews are:

- **Quality Assurance Coordinator** should be trained in the preparation of self-assessment report, mentoring and monitoring of the teaching hours, preparation and implementation of improvement plan, training regarding validation and accreditation process.

- **Management** should undergo through overall management and leadership training, for elaboration of financial plan, school development plan, more trainings in the implementation of Administrative instructions, exchange of experiences with other countries from the region, etc. Coordination aspect in between MED - MES - Vocational School should be also tackled;
- **Teachers/ Instructors:** Although a training has been provided to majority of the teachers, the suggestion was made that, all teachers should be equated on the requirements and criteria for the validation and accreditation process. The teachers/instructors should undergo through professional trainings in their own profile, for the implementation of Core curricula, training for group members that prepare self-assessment report, training of instructors for the validated professions, etc.

### **Vocational training Centers**

An interviewee emphasized that before the validation and accreditation process it would be very helpful for all VTCs to have a joint meeting and discuss on how to fulfill the requirements/prepare the documentation for validation and accreditation. In addition, all staff members of VTCs (QA Coordinator, the management and trainers/instructors) should undergo through a general training on the validation and accreditation criteria and process and a training on how to prepare the requested documentation for validation and accreditation procedure. These trainings will increase the knowledge and awareness of all VTC staff members on requirements and the need for mutual support within their institutions, but also with other institutions. In regards to specific trainings, below are listed the recommended training for:

- **Quality Assurance Coordinator** should undergo through a training to understand better his role and responsibility. An additional training would be beneficial for needed documentation and criteria for Recognition of Prior Learning (RPL);
- **Management** should undergo through different management trainings, while as new managers should undergo through a training in order to understand the overall process of validation and accreditation as mentioned above;
- **Instructors** should be informed and trained on the criteria's they need to fulfill for the validation and accreditation, on the labour market needs and get exposed to the trainings regarding health and safety at work. New instructors should undergo through a general training on validation and accreditation in order that they get prepared;

## 14. Conclusions

Conclusions drawn under this chapter reflect the overall findings related to validation and accreditation procedures of VETIs. Looking at four analysed country cases, we can conclude that it is not that the procedures matter, but the outcome reached, and the main outcome is to offer qualifications that respond to the needs of the labour market and introduce procedures that will lead to improvement of VET.

MES should reflect on above mentioned conclusion. The lack of clarity within the Kosovo legal framework related to validation and accreditation procedures should be addressed during the already planned revision of legal framework by MES. Prior to the review of the legislation, MES should discuss widely with all involved stakeholders about the validation of qualifications procedure, roles of institutions and other mechanisms related to the validation of qualifications. The points that need to be further discussed are:

- Should public Vocational Schools undergo through validation procedure?
- Should the validated/approved qualification which underwent through validation procedure count as approved qualification for all public Vocational Schools where it is being offered? Same question applies for validation of qualifications under the Vocational Training Centers?
- Should the application fees be reconsidered?
- Should public VETIs undergo through accreditation procedure?
- Did MES conduct cost /benefit calculations of both procedures, since there is a big question mark if the cost for current regulated procedures can be covered by MES? Would it be more beneficial for MES to invest these funds for schools workshops and equipments?!

For MES it is still not clear why the qualifications approved by MES, should undergo again through a validation procedure<sup>68</sup>. According to the legal framework all qualifications should be based on approved occupational standards and with proper measures and monitoring, MES can start to revise the formal VET curricula's based on occupational standards. They can fulfill the requirements for validation and automatically register their qualifications under the NQF. Whereas for the accreditation procedure MES should put more efforts in regulating it. At first, it should optimize the

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68. Interview with Valbona Fetiu Mjeku, Head of DVET in MES

network of Vocational Schools, equip their workshops, train the teachers and develop the package of regulations required by NQA for the accreditation of the VETIs.

In addition, although everyone during the interviews has agreed that these procedures are important to assure quality within the VET system, the experience has shown that Kosovo public VETIs, especially Vocational Schools are still not ready to undergo through the regulated procedures for validation and accreditation. From one side MES has decided that all VET schools must undergo through the validation and accreditation procedure, but from the other side MES<sup>67</sup> was not capable to support VET schools (in terms of equipment, documentation, teacher training etc.) to prepare them to enter in the processes.

In order to enter to validation and accreditation procedure, both NQA and VET institutions (VETIs) that wish to apply, should have appropriate human capacities. The involved institutions should have sufficient human capacities to deal with the processes but moreover the responsible staff members should be prepared for the implementation of the processes.

Furthermore, it is still not clear who in reality covers the quality assurance within the Vocational Schools. According to the legislation, in charge for this function are State Inspectorate<sup>69</sup> under MES, NQA, KPI, MEDs and VET schools. QA Coordinator of the VET school should report to all above mentioned institutions. Each of them covers a part of the quality assurance. Therefore MES should thoroughly analyse the responsibilities of each institution and design a system, which will not overburden Vocational Schools and Quality assurance Coordinators within the schools. For the moment none of the Administrative Instructions regulate the time allocation for QA coordinator at VET schools. This inconsistency has created problems within the Vocational Schools, since they do not know which Administrative Instruction they should follow. Some VET schools are following the Administrative Instruction<sup>70</sup> from 2016 but they think that they cannot be treated same as other schools, since Vocational Schools are more complex and QA Coordinators need more time and trainings for the implementation. According to the previous administrative instruction<sup>71</sup>, time allocation for QA Coordinators is not mentioned.

The quality cannot be assured through involvement of many institutions, but through proper assignment and engagement of institutions that will lead to final goal, which is that VETIs offer qualifications that respond to the needs of labour market.

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69. Law No. 06/L-046 on Education Inspectorate in the Republic of Kosovo, <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=17744>

70. MEST Administrative Instruction on Quality Assurance in VETIs No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

71. Administrative Instruction on Quality Assurance in PreUniversity Education institutions No. 32/2014, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10263>

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## Annex 1: List of interviewers

No	Name and Surname	Position	Institution
1	Florim Metaj	QA Coordinator	CoC “ 11 Marsi”- Przren
2	Xhelal Susuri	Director	
3	Hidajete	QA Coordinator	VS “Abdyl Frasheri” -Pristina
4	Beke Mulaj	Director	
5	Mete Hoxhaj	QA Coordinator	VS “Tafil Kasumaj”-Deçan
6	Zenel Kasumaj	Director	
7	Agim Maliqi	QA Coordinator	VS “Andrea Dursaku” - Kamenica
8	Qamil Qehaja	Director	
9	Naim Istrefi	QA Coordinator	VS “Arkitekt Sinani” South Mitrovica
10	Hamit Beqiri	Director	
11	Mustafe Hoti	QA Coordinator	VS “Jonuz Zejnullahu” – Viti
12	Nijazi Lutfiu	Director	
13	Ymredin Tershnjaku	QA Coordinator	CoC “ Shtjefen Gjeqovi” - Pristina
14	Blerim Gervalla	Director	
15	Majlinda Qato-Decani	QA Coordinator	Vocational Training Center-Peja
16	Zyle Zenelaj-Duka	QA Coordinator	Vocational Training Center - Pristina
17	Zenullah Rrustemi	Director	
18	Qamir Maçkaj	QA Coordinator	Vocational Training Center - Prizren
19	Valbona Fetiu Mjeku	Director	Departmet for VET under MES
20	Fikrije Zymberi	Director	Agency for Vocational Education and Training and Adult Education AVETAE
21	Gani Ismajli	Head of the Division	Division for Quality Development and Certification under (EARK)
22	Lah Nitaj	Director	National Qualification Authority NQA
23	Blerim Haliti	VET Expert	LuxDev



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