



GATSBY

A COMPARATIVE CASE STUDY  
ANALYSIS OF THREE EUROPEAN  
QUALITY ASSURANCE SYSTEMS FOR  
VOCATIONAL EDUCATION AND TRAINING

A REPORT TO THE GATSBY FOUNDATION

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## INTRODUCTION

The EU has long held aspirations to shape vocational education and training (VET) policy in Europe, despite its limited jurisdiction in this area. In Part One of this report we examine the background and purpose of one such EU initiative, European Quality Assurance for Vocational Education and Training (EQAVET), and its impact (if any) on the quality assurance systems in the national VET systems of Germany, the Netherlands and Norway. Although each of these countries is a nation state with its own distinctive traditions of skills formation and VET, they nevertheless share some features in common, which can also be found in other European nations. They all embody, in their different ways, social partnership structures and practices.

The report outlines the distinctive national approaches to quality assurance in VET with a focus on the predominant locus of quality assurance in each of the national systems and the key stakeholders in their quality assurance systems. The findings show that a coordinated and consensual approach in distinctive national form can be found across all three target countries. In Part Two of the report, this approach is compared to the system for quality assuring VET in England.

Online interviews were conducted with key members of the EU's EQAVET and European Training Foundation (ETF) policy teams, Cedefop and with a VET policy analyst for the OECD. In addition, interviews were conducted with members of EQAVET networks in Germany, the Netherlands and Norway. As the first point of contact, country network members proved an extremely useful resource for recruiting participants. As well as being able to explain the structure of the VET system and the type of influence EQAVET had on VET in their respective countries, members helped to establish contact with officials responsible for VET policymaking at a national level. Interviews were then secured with officials in Germany's Federal Institute for Vocational Education (*Bundesinstitut fuer Berufsbildung* (BIBB)), the Employers' Organisation for Vocational and Further Training (*Kuratorium der Deutschen Wirtschaft fuer Berufsbildung* (KWB)) and the Trade Union Confederation (*Deutscher Gewerkschaftsbund* (DGB)). A small sample of German VET teachers were also interviewed. In the Netherlands, interviews were conducted with a key policymaker for VET in the Ministry of Education, members of the VET Council (*middelbaar beroepsonderwijs* (MBO)), the Foundation for Cooperation on Vocational Education, Training and Labour Market (*Samenwerkingsorganisatie Beroepsonderwijs Bedrijfsleven* (SBB)) and the VET Quality Network. Norway's EQAVET representative was especially generous, providing contacts for a key policymaker in the Ministry of Education and in three contrasting regions of Norway, each with their own education department. Some of the regional officials suggested school-based practitioners, which made it possible to include interviews with a small sample of VET teachers.

Finally, interviews were also conducted with a small sample of people based in England to help provide context to current trends in skills training and employment. These included a former leader of the OECD's work in VET and key members of WorldSkills UK and a private training and employment company.

Government reports and policy documents produced by EQAVET, the ETF, Cedefop, the OECD and England's Department for Education informed this report, as well as a wide range of academic literature examining approaches to quality assurance for VET in each of the three focus countries and in England.

## PART ONE: SYNTHESIS REPORT ON QUALITY ASSURANCE IN THE VET SYSTEMS OF GERMANY, THE NETHERLANDS AND NORWAY, WITH REFERENCE TO EU QUALITY ASSURANCE INITIATIVES.<sup>1</sup>

### EQAVET

EQAVET is a non-mandatory peer review-based approach to quality assurance that uses operational criteria to assure the effective functioning of national VET systems. It has a small secretariat based in Brussels. It is based on Japanese and Anglo-American approaches to quality assurance in the manufacturing industry, where member countries are invited to nominate aspects of either the structure or the operation of their quality assurance system for peer review. The recommendations made are not mandatory, but the EU hopes it exerts a subtle but pervasive influence on national systems. By its very nature, such an influence will be difficult to detect and it is hard to fully evaluate the EU's claims about influence.

The influence of the EQAVET framework was found to be probably negligible.<sup>2</sup> A key reason was that all three countries already had well-established VET systems including quality assurance systems, before the formation of EQAVET in 2009, which reflect their own approach to the operation and quality assurance of their VET systems. Underpinned by the Deming (plan-do-check-act or PDCA) cycle, the EQAVET framework was felt to be of limited use. For example, Norway relies on its own check and review system for all areas of public administration. A report outlining the Netherlands' quality assurance system points out that it predates EQAVET and that 'most of the descriptors and almost all indicators of the EQAVET framework' were already part of the Dutch quality assurance system for VET.<sup>3</sup>

Germany's Reference Point for Quality Assurance in Vocational Education and Training (DEQA-VET) was established in 2008 in response to the objectives for VET formulated in the 2002 Copenhagen Declaration.<sup>4</sup> However, the Federal Institute for Vocational Education and Training's (*Bundesinstitut für Berufsbildung*, BIBB) study of Germany's quality assurance system found that EQAVET's two-level framework, set out in 2009, was insufficient for Germany's dual system. The EQAVET framework was only designed to quality assure at system and company/provider level; the BIBB extended the framework to include an intermediate level that takes into account the significant role played by sectoral chambers and social partners in Germany's dual system. However, EQAVET did inspire the BIBB to

<sup>1</sup> Throughout this report quality assurance refers to the legislative and institutional structures in place whose objective is to ensure that the aims of the VET system are realised. We contrast quality assurance with quality control, which refers to the practices adopted to ensure that quality is maintained within the framework set by the quality assurance system. A good-quality assurance structure will not achieve its aims if quality control is not thoroughly practised. This distinction is important when considering England.

<sup>2</sup> Please see the EU National Report linked to this report for a fuller discussion of the impact of EU policy on quality assuring VET.

<sup>3</sup> Kamphuis, A. (2019) *Short introduction to quality assurance in VET in the Netherlands*. The Dutch National Reference Point EQAVET. p.9.

<sup>4</sup> Cedefop (2002) *Declaration of the European Ministers of vocational education and training, and the European Commission, convened in Copenhagen on 29 and 30 November 2002, on enhanced European cooperation in vocational education and training*. "The Copenhagen Declaration".

produce a major report on quality assurance for German VET that identified 11 'cornerstones' of quality assurance for company-based training.<sup>5</sup>

Although the EQAVET methodology has not been adopted, one discernible effect has been to prompt national organisations to look again at aspects of their own quality assurance systems. A 2019 report on the potential impact of EQAVET suggests it has continued to raise the profile of quality assurance.<sup>6</sup> This report found a strong desire among all our participants to illustrate how good-quality VET is achieved in their particular VET system. This finding would seem to confirm a general increase in quality assurance culture in national VET systems, and even the prioritising of quality assurance. Nonetheless, the maturity of the VET systems of Germany, the Netherlands and Norway means each country favours its own well-established quality assurance system. Research participants were aware of the weaknesses in their VET systems and were addressing them with national or local policies tailored to their particular system. All the same, participants working on VET policy at a national level felt that the EQAVET framework 'has a value as a reference point'.<sup>7</sup> The majority also felt that it was important to be able to network with other EU countries in order to compare VET systems and share good practice. For these reasons, EQAVET was felt to have some value, although the implementation of the EQAVET framework as quality assurance policy remains a challenge.

As the following sections illustrate, there is a strong sense of VET systems being a reflection of the country's cultural identity and its own economic needs – which does not easily translate to a European-wide approach. Nonetheless, there is a strong commitment to the provision of good-quality VET in all three countries.

## NATIONAL APPROACHES TO QUALITY ASSURING VET

A great deal of cooperation and goodwill goes into the design and quality assurance of VET in Germany, the Netherlands and Norway. All three countries provide types of vocational training that comply with Bussemeyer and Trampusch's 2012 definition of collective skill formation systems.<sup>8</sup> With such systems, intermediate associations (social partners) and the state cooperate in the design of standardised skill profiles that are acquired through school and company-based training.<sup>9</sup> Social partners are usually employers and trade unions, but may also include educators and, on a regional or county level, local councillors. They are members of VET committees, councils or boards at a national, regional or county level, and are instrumental in developing policy, designing VET qualifications and in quality assuring practical training.<sup>10</sup> The culture of trust and cooperation that underpins collective skill formation means that the design and organisation of VET is achieved largely through collaboration between state officials and social partners, with decision-making reached by consensus at both

5 The BIBB's 11 cornerstones of quality assurance for company-based training are: the occupation principle, the consensus principle; reporting; continuous improvement; practical orientation; vocational guidance; trainer aptitude; suitability of training venues; the training relationship; examination procedures; cooperation between learning venues. (See: Guellali, C. (2017) *Quality assurance of company-based training in the dual system in Germany. An overview for practitioners and VET experts*. BIBB, p.12).

6 European Commission, Directorate-General for Employment, Social Affairs and Inclusion (2019) *Study on EU VET instruments (EQAVET and ECVET)*. Publications Office of the European Union, p.51.

7 European Commission, Directorate-General for Employment, Social Affairs and Inclusion (2019) *Study on EU VET instruments (EQAVET and ECVET)*. Publications Office of the European Union, p.57.

8 Bussemeyer, M. R. and C. Trampusch (2012) *The comparative political economy of collective skill formation*. In *The Political Economy of Skill Formation*, edited by M. R. Bussemeyer and C. Trampusch, pp.3-38. Oxford: Oxford University Press, p.4.

9 Michelsen, S., Høst, H., Leemann, R. J. and Imdorf, C. (2023) *Training agencies as intermediary organisations in apprentice training in Norway and Switzerland: general purpose or niche production tools?* *Journal of Vocational Education & Training*, 75(3), p.523.

10 For ease, 'regional' is used to mean Germany's 16 federal states while 'county' is used for Norway's 11 county councils.

a national and regional level. This is particularly the case in Norway and Germany but increasingly applies to Dutch VET. Cooperation and trust apply equally to the ways in which the state and social partnerships work together as much as to how the social partners, with their range of different interests, work together to agree VET policy and what constitutes good-quality VET.

Alongside the collaboration and consensus which characterise company-based education and training, formal processes such as school and college inspections and the monitoring of VET programmes through retention and dropout rates, are used to quality assure school-based vocational education.<sup>11</sup> In the Netherlands and Norway, student and apprentice surveys provide an important additional source of data for evaluating the quality of school-based VET programmes and in-company training. Germany does not survey apprentices on their experiences of the dual system.<sup>12</sup>

### QUALITY ASSURANCE AT NATIONAL, REGIONAL AND LOCAL LEVELS

The different approaches to quality assuring the VET systems of Germany, the Netherlands and Norway reflect wider cultural differences, in particular the political economic contexts in which the VET system is placed. Nonetheless, in all three countries, vocational education is a popular choice for young people – the strength of the dual systems in Germany and the Netherlands is linked to some of the lowest rates of youth unemployment in Europe.<sup>13</sup> The countries' VET systems present some interesting points of comparison. While Germany and Norway's VET systems are organised at a regional/county level, the Dutch system is an unusual mix of centralised control but with regional training centres (*Regionaal Opleidingen Centrum* (ROCs)) that have some relative autonomy. Like Germany and Norway, the Dutch system has a degree of local oversight, however while ROCs are free to choose how they teach, the same does not apply to what they teach. All VET colleges must meet standards set by the Ministry of Education, with content of training for both apprenticeships and taught qualifications set out nationally by the SBB.<sup>14</sup> <sup>15</sup> As with Germany and Norway, the social partners play a significant role in the organisation and quality assurance of the Dutch VET system.

11 Germany's dual system includes vocational schools. In the Netherlands, regional training centres (ROCs) offer a range of vocational education and training courses and may be one large institution or be made up of several VET colleges. In Norway, VET programmes are taught in upper secondary institutions. These may be exclusively vocational or provide both general academic and vocational education.

12 The only recent survey of young peoples' experiences of Germany's dual system appears to be a 2015 survey of 12,000 university students at risk of dropping out (conducted by BIBB in cooperation with the Department of Labour Economics at Maastricht University). Results showed that 40% would consider going straight into work over company-based education and training. See: Hemkes, N. and Wiesner, K. M. (2016) *Higher education doubters and their view of vocational education and training: results of a student survey*. BIBB.

13 OECD (2024) *Youth unemployment rate*.

14 Eurydice (2023) *Norway: traineeships and apprenticeships*.

15 'One of the founding principles of the education system in the Netherlands, guaranteed under article 23 of the Constitution, is freedom of education, which covers the freedom to establish a school; the freedom to organise teaching in schools; and the freedom to determine the principles upon which a school is based. In theory, schools [and all educational institutions] are therefore free to determine the curriculum they teach their pupils, although the Ministry of Education, Culture and Science sets:

- the standards of quality which all schools ... should meet
- the subjects learners should study at each level of education and the expected learning outcomes for each subject
- the content of national examinations
- the number of teaching hours per year
- the qualifications teachers are required to have'.

O'Donnell, S. and Burgess, H. (2018) *Upper secondary education in Netherlands: full review*.

Although the means through which the social partners play their part in each country differs, their influence is in evidence at both a national and county/regional level. In all three countries, the social partners are involved in the design of vocational qualifications, specifically the competencies which should form part of those qualifications. In addition, they play a key role in quality assuring company-based training. VET is an important part of upper secondary education in all three countries' education systems, and an inspectorate is responsible for quality assuring vocational schools and colleges.

## Germany

The German dual system is often regarded as a model for education reform since it produces 'low levels of youth unemployment, a highly trained workforce at the intermediate skills level and – as a consequence – high levels of competitiveness', especially in high-quality manufacturing.<sup>16</sup> Responsibility for the VET system is shared between the federal government and the federal states, or *Länder*. The Federal Ministry of Education and Research (*Bundesministerium für Bildung und Forschung* (BMBF)) steers national VET policy, but the actual delivery of VET is clearly divided by task. While the federal government is responsible for the company-based aspects of dual apprenticeships, VET schools that deliver the theoretical training and knowledge for apprenticeship training come under the authority of the education departments (ministries) of the individual *Länder*.<sup>17</sup> German VET is informed by a long tradition of corporatist decision-making, with the sectoral chambers responsible for the organisation and awarding of vocational qualifications and for quality assuring the whole of the training process.<sup>18</sup> Curricula for the company-based and school-based part of the dual system is 'decided in a complex process of negotiation that involves business and professional associations, trade unions, the BIBB, the *Länder* governments, and different federal ministries, depending on the particular occupation'.<sup>19</sup> The 'consensus-based corporatist system' for which all decision-making requires the agreement of the social partners and the state, means agreements can take several years.<sup>20</sup> Thus, on the one hand, the German VET system lacks the agile responsiveness needed 'in the context of the rapidly changing demands of the knowledge economy and the digitalisation of work'.<sup>21</sup> On the other, corporatist decision-making is widely perceived as a strength of the system where 'the continuous interaction between stakeholders in different contexts has contributed to the development of a level of mutual trust among the actors involved'.<sup>22</sup>

Although the German system encompasses various forms of part and full-time vocational education in vocational schools, 'its core strength (and characteristic) is the dual apprenticeship training system'.<sup>23</sup> Vocational schools teach a skeleton

16 OECD (2020) *Case study: the Alliance for Initial and Further Training in Germany*. In, *Strengthening the Governance of Skills Systems: Lessons from Six OECD Countries*. OECD Publishing: Paris. p.61.

17 OECD (2020) *Education policy outlook: Germany*. p.17.

18 Sievers, Y. (2014) *Vocational education & training (VET) and the Chambers of Commerce in Germany - and elsewhere*. DIHK. [PowerPoint presentation]

19 OECD (2020) *Case study: the Alliance for Initial and Further Training in Germany*. In, *Strengthening the Governance of Skills Systems: Lessons from Six OECD Countries*. OECD Publishing: Paris. p.63.

20 Haasler, S. R. (2020) *The German system of vocational education and training: challenges of gender, academisation and the integration of low-achieving youth*. *Transfer: European Review of Labour and Research*, 26(1), p.59.

21 Haasler, S. R. (2020) *The German system of vocational education and training: challenges of gender, academisation and the integration of low-achieving youth*. *Transfer: European Review of Labour and Research*, 26(1), p.59.

22 OECD (2020) *Case study: the Alliance for Initial and Further Training in Germany*. In, *Strengthening the Governance of Skills Systems: Lessons from Six OECD Countries*. OECD Publishing: Paris. p.68.

23 OECD (2020) *Case study: the Alliance for Initial and Further Training in Germany*. In, *Strengthening the Governance of Skills Systems: Lessons from Six OECD Countries*. OECD Publishing: Paris. p.62.

curriculum and are monitored by a regional school inspectorate.<sup>24</sup>

## The Netherlands

The delivery of Dutch upper secondary VET (*middelbaar beroepsonderwijs* (MBO)) involves a mix of national and regional control. Key aspects, such as the design of vocational qualifications and the quality of company-based training and industry placements, are quality assured by the Foundation for Cooperation on Vocational Education, Training and Labour Market (*Samenwerkingsorganisatie Beroepsonderwijs Bedrijfsleven* (SBB)).<sup>25</sup> The SBB carries 'out tasks on the instructions of the Ministry of Education, Culture and Science'<sup>26</sup> and is a tri-partite organisation – working together within the SBB, VET educators and social partners are responsible for maintaining the qualification framework for secondary VET and ensuring vocational programmes are kept up to date. The SBB accredits the companies that provide apprenticeship training and industry placements and is responsible for collecting data on the labour market.<sup>27</sup> It also oversees the continual professional development of company trainers.<sup>28</sup> In addition, the SBB advises the Ministry on VET policy and is 'a single contact point that draws up recommendations and advice on education and labour market, against the background of social interests'.<sup>29</sup> The SBB's substantial remit includes developing 'themes with a cross-regional and cross-sector focus'.<sup>30</sup>

In addition to the SBB's role in company-based training, regional multisectoral training centres, or ROCs, are responsible for the provision of all types of VET courses.<sup>31</sup> ROCs range in type from a single college to several campuses in different locations for larger cities. Emmenegger and Seitzl describe VET colleges as being 'highly autonomous' because they decide 'how nationally defined goals and standards are implemented in the individual apprenticeship programmes'.<sup>32</sup> They are also 'responsible for attuning their VET provision regionally'.<sup>33</sup> Nonetheless, competition is highly managed in the Netherlands, and all VET colleges are quality assured by the Dutch Inspectorate of Education to ensure that they meet statutory requirements.<sup>34 35</sup>

24 'The skeleton training curriculum serves as a guideline. Enterprises can depart from the course schedule and the material covered in line with their own requirements, gearing training more closely to their own specific requirements. They only need to ensure that trainees pass the examination. The learning objectives are minimum standards'. Kau, W. (2004) *Costs and benefits of vocational education and training at the microeconomic level*. In: Cedefop (ed) *Vocational education and training – the European research field background report – Volume I*. Luxembourg: Office for Official Publications of the European Communities, p.200.

25 The Dutch upper secondary vocational system (MBO) has two equivalent pathways: the school-based pathway (BOL) and the dual pathway or apprenticeship route (BBL). Work placements of either one day a week or a block release are an integral part of the BOL while apprenticeship training is integral to the BBL programme.

26 SBB (accessed 2024) *Welcome to SBB*.

27 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.23.

28 Information from an SBB spokesperson.

29 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.24.

30 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.23.

31 Eurydice (2023) *Netherlands: organisation of vocational upper secondary education (MBO) – the SBB: linking up vocational education and the world of work*.

32 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.38.

33 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.46.

34 Kamphuis, A. (2019) *Short introduction to quality assurance in VET in the Netherlands*. The Dutch National Reference Point EQAVET. p.4.

35 In 2011, the Dutch Government introduced its Focus on Craftsmanship initiative, which marked a shift in VET policy. Its 'explicit aim [was] to limit [college] autonomy and to increase state control ... [by] for example, privatising educational programmes for target groups and limiting the variety of arrangements defined between schools [colleges] and local industries'. Westerhuis, A. and van der Meer, M. (2017) *Great expectations: VET's meaning for Dutch local industry*. In: de Bruijn, E., Billet, S. and Ostenk, J. (eds) *Enhancing Teaching and Learning in the Dutch Vocational Education System*. Springer. p.90.



## Norway

The administration of Norwegian VET takes place at two levels: the central (national) level and the county level. At the national level, the Norwegian government sets the goals and framework for the whole of the education system, while the Ministry of Education and Research (the Ministry of Education) 'steers national education policy at all levels through legislation, regulations, curricula and framework plans'.<sup>36</sup> As an agency of the Ministry of Education, the Directorate for Education and Training is responsible for all school-based education, including school- and company-based VET integral to the 2+2 model,<sup>37</sup> and for the inspectorate. It also hosts the secretariats for both the National Council for VET and the 10 vocational training councils.<sup>38</sup> County education departments organise and quality assure the whole of the 2+2 system, with apprenticeships organised through the upper secondary education system.<sup>39</sup> Like the MBO in the Netherlands, Norway's 2+2 vocational system is fully integrated into the country's upper secondary education system.

## QUALITY ASSURING THE ENGLISH VET SYSTEM

A significant part of England's VET system is delivered through further education (FE) colleges. Colleges are overseen by the Department for Education and are quality assured by the Office for Standards in Education, Children's Services and Skills (Ofsted). Qualifications offered in schools and colleges in England are regulated by the Office of Qualifications and Examinations Regulation (Ofqual). Apprenticeships and technical qualifications are overseen by the Institute for Apprenticeships and Technical Qualifications (IfATE), and they are also subject to the scrutiny of Ofqual.

In 2020, Ofqual also became responsible for quality assuring end-point assessments for apprenticeships. End-point assessments are contracted out to private companies apart from for occupations that have a statutory regulator or where a professional body controls entry into an occupation.<sup>40</sup> In all other cases, IfATE designs the External Quality Assurance (EQA) framework which sets out how apprenticeship end-point assessments should be externally quality assured. The framework describes 'what good practice in EPA [end-point assessment] looks like, and what EQA providers should look out for to be confident this has happened'.<sup>41</sup>

IfATE was formed in 2017 to develop the 'Quality Strategy [which] sets out best practice expectations before, during, and after apprenticeships'.<sup>42</sup> It describes itself 'as an arm's length body of the Department for Education' working with employers 'to develop, approve, review and revise apprenticeships and technical qualifications'.<sup>43</sup> IfATE-approved apprenticeships and technical education products include the knowledge, skills and behaviours set out in IfATE's occupation criteria.

36 OECD (2020) *Education policy outlook: Norway*, p.17.

37 'Most upper secondary VET programmes follow the main 2+2 model. The model entails two years of education in an upper secondary school followed by two years of apprenticeship training and productive work in a training enterprise or public institution.' Directorate for Education and Training, Norway (accessed 2024) *Norwegian vocational education and training (VET)*.

38 Cedefop (2019) *Vocational education and training in Europe – Norway: system description*, p.23.

39 Eurydice (2023) *Norway: traineeships and apprenticeships*.

40 The Office for Students quality assures integrated higher and degree apprenticeships.

41 IfATE (2023) *External quality assurance of apprenticeships: 2. EQA framework*.

42 IfATE (accessed 2024) *The quality strategy*.

43 IfATE (accessed 2024) *What we do*.



IfATE also chairs the Quality Alliance, a coalition of government bodies concerned with ensuring apprenticeship quality which includes:

- the Education and Skills Funding Agency
- Ofsted
- Ofqual
- the Quality Assurance Agency for Higher Education
- the Office for Students

In addition, the following organisations contribute to Quality Alliance meetings as observers:

- the Association of Colleges
- the Association of Employment and Learning Providers
- the Federation of Awarding Bodies
- Universities UK

The Quality Alliance is a recent initiative for VET in England. It appears to work using the same collaborative approach used by European VET councils and sectoral chambers, but it lacks the social partner involvement which is fundamental to the development and quality assurance of VET in Germany and Norway, and which the Netherlands achieves through the sectoral boards and thematic committees of the SBB.

FE colleges operate in a marketised education system. For example, in England, with the incorporation of colleges in the 1990s, the role of FE college principals:

*... evolved significantly from that of chief academic officer to one that combines responsibility for academic matters with that of being the chief executive of a multimillion pound business ...*<sup>44</sup>

In a similar way, Dutch VET colleges compete in a market-oriented environment and to some extent behave as entrepreneurial organisations, while remaining in the public sector.<sup>45</sup> Although English FE colleges' entrepreneurial behaviour was reigned in under New Labour (1997-2010), like Dutch VET colleges, they have to compete for students and are subject to inspections conducted by a national inspectorate which serves as a non-ministerial government department. In addition, the Dutch Certification Institution regulates qualifications, assessment and examinations, much like England's Ofqual. Another similarity is that English FE colleges and Dutch VET colleges buy in government approved assessments.

A key player in quality assuring England's VET is Ofsted. England differs from many European countries by having a school inspectorate which has several other areas of responsibility, including the inspection of skills and apprenticeship training at all levels.<sup>46</sup> Since the introduction of the Skills and Post-16 Education Act 2022, Ofsted now also assesses FE colleges on how well they meet the skills needs of the local

44 Greatbatch, D. and Tate, S. (2018) *Teaching, leadership and governance in further education*. Report for the Department for Education. p.50.

45 Honingh, M. and Karsten, S. (2007) *Marketization in the Dutch vocational education and training sector*. *Public Management Review*, 9(1), see Abstract.

46 Ofsted inspects 'maintained schools and academies, some independent schools, colleges, apprenticeship providers, prison education ... childcare, local authorities, adoption and fostering agencies, initial teacher training and teacher development.' It is also responsible for regulating 'a range of early years and children's social care services'. Ofsted (accessed 2024) *Ofsted: about us*.

area.<sup>47</sup> In Germany, the Netherlands and Norway, vocational education, which takes place in schools or colleges, and company-based apprenticeship training, are treated as separate for quality assurance purposes. School inspectorates are responsible for all school-based learning and social partners are responsible for quality assuring work-based learning and training provided by companies. Even in the Netherlands, where the inspectorate's remit includes VET, inspectors tend to focus more on internal governance procedures and legal compliance, and they deal with the college's school board to do this. Inspectors may inspect the provision of general education, which is a compulsory part of MBO, but colleges are forewarned.<sup>48</sup>

## VET SCHOOLS AND COLLEGES – COMPARING APPROACHES TO INSPECTION

In most European countries, inspections are about creating the regulatory framework within which schools and colleges 'enjoy relative autonomy while simultaneously being held responsible for student performance outcomes ... Accountability remains central, but the improvement of organisational performance ... is also a key goal'.<sup>49</sup> In England, and until 2017 in the Netherlands, the main function of inspections is 'quality assessment and accountability'.<sup>50</sup> However, the reforms to the Dutch inspectorate introduced an approach that is not only concerned with 'assuring basic quality' but also with 'stimulating' school and colleges to 'constantly improve their quality by determining their own goals and ambitions to reach a level above basic quality'.<sup>51</sup> This approach now contrasts strongly with England's.

Studies show Ofsted as an outlier in a European-wide preference for inspection systems that are moving away from 'regulative and inquisitorial modes of governing (both of which are expensive and problematic in terms of trust) to meditative governing by inspection' characterised by high levels of trust.<sup>52 53</sup>

Prioritising learners is key to Norway's education system where the pupil perspective is fundamental to all educational policymaking and inspection processes. In the Netherlands, students' views also play an important role in quality assuring VET. Both countries conduct national and institutional surveys of student satisfaction in their VET programmes and for apprentices in training. In the Netherlands there is also a drive to involve students in the design of the quality assurance systems of all VET colleges.<sup>54</sup>

47 Chowen, S. (2022) *Ofsted to review how it inspects FE and skills, new strategy states*. *FE Week*, 26 April 2022.

48 It is mandatory for every MBO student to study Maths, Dutch and English, for which students sit national written exams.

49 Brown, M., McNamara, G., O'Hara, J. and O'Brien, S. (2016) *Exploring the changing face of school inspections*. *Eurasian Journal of Educational Research*, 66, pp.2-3.

50 Janssens, F. J. G. and van Amelsvoort, G. H. (2008) *School self-evaluations and school inspections in Europe: an exploratory study*. *Studies in Educational Evaluation*, 34(1), p.20.

51 The Standing International Conference of Inspectorates (accessed 2024) *Inspectorate profile: the Netherlands*.

52 Grek, S., Lawn, M., Ozga, J. and Segerholm, C. (2013) *Governing by inspection? European inspectorates and the creation of a European education policy space*. *Comparative Education*, 49(4), p.499.

53 See also: Munoz, B. and Ehren, M. (2021) *Inspection across the UK: how the four nations intend to contribute to school improvement*; Beyond Ofsted Inquiry (2023) *Final report of the inquiry*. London: NEU; Van Bruggen, J. C. (2010) *Inspectorates of education in Europe: some comparative remarks about their work*. The Standing Conference of Inspectorates.

54 Information from spokespeople for the MBO Raad and EQAVET National Reference Point for the Netherlands.

## The role of school inspections

The three main functions of European school inspectorates are to evaluate the quality of education, advise schools about improvement and ensure compliance with regulations.<sup>55</sup> In both Germany and Norway, education is organised and overseen at federal state/county level, as are their school inspection systems. A series of reforms over the last decade means that Norway's school inspections have evolved from a system of control, achieved through 'mere compliance control', to one based on evaluation and support.<sup>56</sup>

The Dutch education system has been described as 'de facto "quasi-market"' which has 'resulted in a highly diverse system where parents are free to choose between "general" schools, schools with a particular pedagogical foundation and/or schools that adopt a particular religious or philosophical approach'.<sup>57</sup> Nonetheless, it includes a centralised school inspectorate that has been compared to the English system.<sup>58</sup> However, 2017 reforms mean that the supervision of VET schools now includes an 'encouraging role' to help enhance the quality of education.<sup>59</sup> In other ways too, the Dutch inspectorate is developing practices more in keeping with the model found in Germany and Norway. Aimed at school self-improvement as much as school accountability, the growth of school self-evaluation in European inspection practices places the emphasis on individual 'schools' responsibility for their continuous quality monitoring, evaluating and reporting processes'.<sup>60</sup> This approach has been welcomed by Dutch VET colleges, and can be seen in the VET Quality Network and the EQAVET National Reference Point<sup>61</sup> for the Netherlands.

The Dutch and Norwegian inspectorates have reformed their systems to be more sympathetic to the realities of how schools and colleges work than the current English system. For example, Ofsted gives just one day's notice of an inspection visit, where Dutch schools are given many months' notice and Norwegian schools are given three to four weeks' notice. In both countries schools are told well in advance the focus of the visit and are sent related questions. Schools are given appropriate time to respond and to provide any necessary documentation. The Dutch inspectorate also works closely with VET stakeholders and is actively involved in collaborative processes which inform policymaking for VET. Finally, the Dutch inspectorate is taking an increasingly supportive and developmental approach to quality assuring VET colleges. Coupled with a move towards VET colleges designing their own quality assurance systems, the inspectorate is reported to be supportive of the aim to create a quality culture where everyone at every level takes responsibility for the quality of their particular area.<sup>62</sup> The intention is to reduce the frequency of formal external inspections.

55 Van Bruggen, J. C. (2001) Functions of inspectorates in Europe. *International Inspection, Academy, Berlin*. Cited in Janssens, F. J. G. and van Amelsvoort, G. H. (2008) School self-evaluations and school inspections in Europe: an exploratory study. *Studies in Educational Evaluation*, 34(1), p.20.

56 Hall, J. B. (2018) Processes of reforming: the case of the Norwegian state school inspection policy frameworks. *Education Inquiry*, 9(4), p.397.

57 Browes, N. and Altinyelken, H. K. (2021) The instrumentation of test-based accountability in the autonomous Dutch system. *Journal of Education Policy*, 36(1), p.114.

58 Grek, S., Lawn, M., Ozga, J. and Segerholm, C. (2013) Governing by inspection? European inspectorates and the creation of a European education policy space. *Comparative Education*, 49(4), p.498.

59 Kamphuis, A. (2019) *Short introduction to quality assurance in VET in the Netherlands*. The Dutch National Reference Point EQAVET. p.5.

60 Ozga, J. and Lawn, M. (2014) Inspectorates and politics: the trajectories of school inspection in England and Scotland. *Revue Française de Pédagogie*, 186, p.18.

61 The National Reference Point is the national agency responsible for liaising with EQAVET.

62 Information from spokespeople for the VET Quality Network and EQAVET National Reference Point for the Netherlands.

Germany's decentralised education system means that each *Länder* is responsible for school-based VET and for choosing a quality assurance framework.<sup>63</sup> School inspections are a relatively new quality assurance tool. Introduced by all 16 *Länder* between 2004 and 2008 as part of the reforms prompted by the 2000 Programme for International Student Assessment (PISA) shock when Germany's schools scored poorly in student learning outcomes in comparison with other OECD countries.<sup>64</sup> Although each *Länder* designs their own school inspection procedures, the general approach tends to be the same, with 'the implicit expectation that inspection results will promote school improvement'.<sup>65</sup> German school inspections are less focused on the control and accountability of schools and teachers than the inspections in England and until 2017 in the Netherlands, and inspection reports are not made public.<sup>66</sup> In Norway, school inspection reports are publicly available but only within the county.<sup>67</sup>

### School self-evaluation

Broadly defined as 'a systematic process which includes cyclic activities such as goal setting, planning, evaluation and [that] defines new improvement measures', school self-evaluation is 'virtually synonymous with definitions for QA [quality assurance] or school development planning'.<sup>68</sup> School self-evaluation plays an important additional part in the quality assurance systems for schools and vocational schools/VET colleges in Germany, the Netherlands and Norway.

Mandatory school self-evaluation is part of Norway's well-established tradition of school autonomy.<sup>69</sup> Schools are increasingly submitting annual reports and school self-evaluation as part of the inspection process.<sup>70</sup> In addition, county councils submit annual self-evaluation type status reports on their provision of education.

In the Netherlands, inspections of VET colleges include checks on a school's compliance with the law as well as the school's ability to meet the 'quality targets and standards' they set for themselves.<sup>71</sup> The ultimate aim of the Dutch school inspectorate's emphasis on self-evaluation is to introduce proportional external evaluation.<sup>72</sup>

School self-evaluation was also introduced in Germany as part of the many educational reforms initiated after the PISA shock and the development of schools as 'self-managing structures'.<sup>73</sup> Increasingly, self-evaluation or school development

63 EQAVET (2023) *Quality assurance in VET: Germany*. Available from the EU Commission, Employment, Social Affairs and Inclusion: publications and documents document database, search 'quality assurance in VET'.

64 For more information on the PISA shock see: Waldow, F. (2009) *What PISA did and did not do: Germany after the 'PISA-shock'*. *European Educational Research Journal*, 8(3), pp.476-483.

65 Dederig, K. (2015) *The same procedure as every time? School inspections and school development in Germany*. *Improving Schools*, 18(2), p.171.

66 Röbbken, H., Schütz, M. and Lehmkuhl, P. (2019) *From reform to reform: how school reforms are motivated and interrupted – the case of 'school inspections' in Germany*. *Journal of Educational Administration and History*, 51(4), p.316.

67 Eurydice (2023) *Norway: quality assurance in early childhood and school education*.

68 Janssens, F. J. G. and van Amelsvoort, G. H. (2008) *School self-evaluations and school inspections in Europe: an exploratory study*. *Studies in Educational Evaluation*, 34(1), p.16.

69 Nusche, D., Earl, L., Maxwell, W. and Shewbridge, C. (2011) *OECD reviews of evaluation and assessment in education: Norway*. OECD. p.9.

70 Hall, J. B. (2018) *Processes of reforming: the case of the Norwegian state school inspection policy frameworks*. *Education Inquiry*, 9(4), p.406.

71 Eurydice (2023) *Netherlands: quality assurance in early childhood and school education*.

72 '... the extent of the actual school inspection is based on data reported in a school's self-evaluation'. Janssens, F. J. G. and van Amelsvoort, G. H. (2008) *School self-evaluations and school inspections in Europe: an exploratory study*. *Studies in Educational Evaluation*, 34(1), p.15.

73 Huber, S. G. and Gördel, B. (2006) *Quality assurance in the German school system*. *European Educational Research Journal*, 5(3-4), p.196.

plans supplement external inspection in German schools. Janssen and van Amelsvoort's 2008 study found that in both Germany and the Netherlands, school self-evaluation 'is regarded as a sufficient basis for inspectorial judgements'.<sup>74</sup> This suggests that even before inspection reform in the Netherlands, there existed a degree of trust between the schools and their respective inspectorates in Germany and the Netherlands, which is not found in England's inspections.<sup>75</sup> A far cry from the English policy context is the 'elevated level of trust in school self-evaluation' which characterises the Scottish Inspectorate<sup>76</sup> and which, following Scotland's collaboration with Norway on education policy and evaluation, can be seen in Norway's reformed inspection framework.<sup>77 78 79</sup>

In England, an updated Further Education and Skills Inspection Handbook was released in April 2024. Self-assessment reports now form a mandatory part of the inspection process: 'Inspectors will use self-assessment reports, or equivalent documents, to assess risk, monitor standards and plan for inspection'.<sup>80</sup> The expectation that a self-assessment report 'should be part of the provider's processes and not generated solely for inspection purposes' remains in place.<sup>81 82</sup> The European preference for self-evaluation suggests both measurement against a standard and a process of reflection:

*Ideally, both internal and external evaluation are part of a coherent approach in which they reinforce each other. Inspectorates and other national and local agencies may support school [and college] self-evaluation by providing guidance and tools, developing dialogue-based approaches, making evaluation of school [and college] self-evaluation and improvement an important feature of inspection, promoting collaboration in schools and networks, and sharing good practices.*<sup>83</sup>

### The role of the social partners

A major difference between apprenticeships and school-based VET systems is that VET and the labour market are linked in the apprenticeship system. As well as training that provides a 'purposeful and systematic exposure to the "real world of work"', an apprenticeship introduces the apprentice to 'the involvement of

74 Janssens, F. J. G. and van Amelsvoort, G. H. (2008) School self-evaluations and school inspections in Europe: an exploratory study. *Studies in Educational Evaluation*, 34(1), p.20.

75 See: Beyond Ofsted Inquiry (2023) *Final report of the inquiry*. London: NEU

76 Hall, J. B. (2018) Processes of reforming: the case of the Norwegian state school inspection policy frameworks. *Education Inquiry*, 9(4), p.400.

77 Grek, S., Lawn, M., Ozga, J. and Segerholm, C. (2013) Governing by inspection? European inspectorates and the creation of a European education policy space. *Comparative Education*, 49(4), p.491 & p.497.

78 Ozga, J. and Lawn, M. (2014) Inspectorates and politics: the trajectories of school inspection in England and Scotland. *Revue Française de Pédagogie*, 186, p.18.

79 Grek and Ozga (2010) argue that while England has, since the mid-1990s, tended to look to America, Scotland prefers European models of education policymaking. (See: Grek, S. and Ozga, J. (2010) Governing education through data: Scotland, England and the European education policy space. *British Educational Research Journal*, 36(6), p.941.) Scotland uses 'Europe as a platform for the projection of a distinctive Scottish identity'. (See: Ozga, J. and Lawn, M. (2014) Inspectorates and politics: the trajectories of school inspection in England and Scotland. *Revue Française de Pédagogie*, 186, p.18.) And, as part of this, the Scottish Inspectorate is keen to distinguish itself from Ofsted (See: Grek, S., Lawn, M., Ozga, J. and Segerholm, C. (2013) Governing by inspection? European inspectorates and the creation of a European education policy space. *Comparative Education*, 49(4), p.497.) Scotland is also involved in developing inspection regimes in Europe, 'and this is reflected in their very active participation in the Standing International Conference of Inspectorates (SICI)'. (See: Ozga, J. and Lawn, M. (2014) Inspectorates and politics: the trajectories of school inspection in England and Scotland. *Revue Française de Pédagogie*, 186, p.18.)

80 Ofsted (updated April 2024) *Further education and skills inspection handbook*. Paragraph 144.

81 Ofsted (2017) *Further education and skills inspection handbook*. Paragraph 95, p.23.

82 Ofsted (updated April 2024) *Further education and skills inspection handbook*. Paragraph 147.

83 EU Commission (2020) *Supporting school self-evaluation and development through quality assurance policies: key considerations for policy makers*. Report by ET2020 Working Group Schools. p.3.

social partners ... in the design, governance and delivery of the VET'.<sup>84</sup> Shared responsibilities and joint ownership are key features of contemporary European apprenticeship systems, with social partners 'directly involved in the development of qualification standards and the governance of the apprenticeship system'.<sup>85</sup> In Germany, the Netherlands and Norway, much of the work that supports the collaboration of the different social partners is carried out by formally recognised bodies, such as sectoral chambers, councils, boards and committees. Equal representation is given to employers and employees, national/regional governments and other stakeholders.

### **Germany – the role of the sectoral chambers**

The design, organisation and governance of Germany's dual system is shared by the federal government and the *Länder* with 'a high degree of social partner involvement'.<sup>86</sup> The social partners – represented by the Chambers of Commerce and Industry, and the Chamber of Crafts for the employers and by the trade unions for the employees – are involved in decision-making 'at all levels of governance'.<sup>87</sup> Partners who make up the Alliance for Initial and Further Training, including representatives of the federal government, the *Länder*, trade unions and business associations, meet once a year to agree long-term strategic goals for the VET system.<sup>88</sup>

Formed in 2014, the Alliance epitomises Germany's long tradition of collective decision-making in skills policy. It 'brings added value by effectively pursuing a "whole-of-government" approach in promoting collaboration between stakeholders'.<sup>89</sup> Although it is not prescribed by law, the Alliance has 'political legitimacy'.<sup>90</sup>

Employer and trade union representatives, alongside representatives from the federal and regional governments, make up the membership of the executive board of the BIBB, which advises the federal government in all VET-related matters.<sup>91</sup> The social partners are also members of the *Länder* vocational training committees that advise on the implementation of the curriculum framework for VET schools developed by the Standing Conference of Ministers of Education and Cultural Affairs (*Kultusministerkonferenz* (KMK)). So the social partners play a significant role in defining both company- and school-based VET.<sup>92</sup> They also give advice and guidance to training companies, supervise company-based training, register trainees, certify trainers' specialist aptitudes, and are responsible for the

84 Poulsen, S. B. and Eberhardt, C. (2016) *Approaching apprenticeship systems from a European perspective*. Discussion Papers 171. BIBB, p.8.

85 Poulsen, S. B. and Eberhardt, C. (2016) *Approaching apprenticeship systems from a European perspective*. Discussion Papers 171. BIBB, p.15.

86 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.32.

87 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.31.

88 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.32.

89 OECD (2020) *Case study: the Alliance for Initial and Further Training in Germany*. In, *Strengthening the Governance of Skills Systems: Lessons from Six OECD Countries*. OECD Publishing: Paris, p.60.

90 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.32.

91 More details about the BIBB board can be found at: BIBB (accessed 2024) *Board*.

92 Emmenegger, P. and Seitzl, L. (2020) Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. *Transfer: European Review of Labour and Research*, 26(1), p.33.



implementation of examinations and the awarding of qualifications.<sup>93 94</sup>

The social partners' considerable influence on the content and form of VET ensures that the interests of all parties are taken into account. At the same time, 'responsible action by all participants – beyond each group's particular interests – is a precondition for the efficiency of the dual system'.<sup>95</sup> This means that cooperation and collaboration is possible between parties whose interests may not align, such as employers' associations and trade unions. The expectation is that all parties will find areas where they can cooperate and work to their mutual benefit. With equal partnership in VET policymaking and the design of qualifications and assessment, it is possible to achieve decision-making through consensus. As a senior BIBB official explained, the consensus principle permeates every level of German VET and universal buy-in is achieved because decisions made by experts tend to be trusted in Germany. Describing their annual meetings to plan long-term strategic goals and to adjust the occupational competencies, representatives of German Employers' Organisation for Vocational and Further Training (*Kuratorium der Deutschen Wirtschaft für Berufsbildung* (KWB)) and the German Trade Union Confederation (*Deutscher Gewerkschaftsbund* (DGB)) stress the importance of mutual trust and cooperation. A KWB official explained that they place trust above everything else when negotiating with the DGB. With the mutual trust that exists between organisations, personal trust follows, which makes it possible to 'solve all kinds of problems'.

The social partners, by dint of their membership on the BIBB board, are also deeply involved in research and reporting on VET, 'thereby contributing to quality assurance'.<sup>96</sup> This can be seen in their participation in a major BIBB study of quality assurance initiatives conducted by the largest multisectoral chambers, the Chambers of Commerce and Industry and the Chamber of Crafts. By far the most popular and highly valued of all the quality assurance initiatives were those which aimed to 'refresh and professionalise the pedagogical and organisational competencies of trainers'.<sup>97</sup> The authors of the study point out, trainers 'are in direct contact with trainees and are known to exert a material influence on [the] quality of training'.<sup>98</sup> The significance of this research lies in the influence of the social partners (specifically, the employers) not only as participants in the study but as the driving force behind innovative and incentivising approaches to quality assurance. In addition to training and networks, initiatives being used by the Chambers of Commerce and Industry and the Chamber of Crafts include awards for good-quality in-company training and tools, such as work materials and aids that can be used in everyday training.<sup>99</sup> The response rates for the BIBB's survey was high,<sup>100</sup> which suggests that companies are interested in quality assurance initiatives and that they respect the research.

93 Hippach-Schneider, U., Krause, M. and Woll, C. (2007) *Vocational education and training in Germany: short description*. Cedefop Panorama series: I 38. Luxembourg: Office for Official Publications of the European Communities. p.20.

94 Hippach-Schneider, U. and Huismann, A. (2019) *Vocational education and training in Europe: Germany*. Cedefop ReferNet VET in Europe reports. p.38.

95 Hippach-Schneider, U. and Huismann, A. (2019) *Vocational education and training in Europe: Germany*. Cedefop ReferNet VET in Europe reports. p.37.

96 Cedefop (2020) *Vocational education and training in Germany: short description*. p.46.

97 Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB. p.35.

98 Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB. p.35.

99 Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB. pp.38-9.

100 Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB. p.25.



### ***The Netherlands – the role of the SBB***

Because the Netherlands are ‘the “youngest” member of the collective skill formation family’,<sup>101</sup> their involvement of social partners in the VET system is relatively recent. Major reforms of the Dutch VET system in the mid-1990s saw vocational schools replaced with multisectoral training centres, or ROCs, to deliver all types of vocational training, including the then newly created upper secondary VET (MBO).<sup>102</sup> The MBO effectively combines school-based and work-based training and can be studied either via an apprenticeship or school-based model.

Another reform, in 2015, gave the SBB legal responsibility for the accreditation of training companies and the maintenance of the qualification framework for secondary vocational education. This was important for the role that the social partners came to play in Dutch VET<sup>103</sup> – as a ‘collaborative venture between secondary vocational education and trade and industry associations’,<sup>104</sup> the SBB oversees every aspect of the Dutch VET system. It is funded by the Dutch Ministry of Education, Culture and Science, and provides advice to the Ministry on VET policy, with the social partners represented at every level of the organisation’s structure. The SBB board, its eight sectoral boards and three thematic committees (that advise on specific market/labour needs) are made up of an equal number of industry-based representatives (employee association and trade unions) and VET educators. All ‘work together on VET qualifications, examinations, work placements, the efficiency of programmes and more’.<sup>105</sup> A key part of the SBB’s work is to ensure ‘that the knowledge and skills taught at MBO are in line with developments in the world of work’.<sup>106</sup> Like Germany’s BIBB, the SBB also collects data on the labour market and conducts research.

All Dutch students must be trained by an SBB accredited company to gain their MBO diploma. The accreditation of training companies is one of the SBB’s legal responsibilities. A key criterion for accreditation is the quality of trainers.<sup>107</sup> The SBB ensures that instructors are appropriately qualified and have the certified pedagogical skills to train and look after the physical safety and mental wellbeing of apprentices.<sup>108 109</sup>

Echoing a key finding of the BIBB report on the quality assurance initiatives of the German chambers,<sup>110</sup> the SBB places a great deal of importance on developing the professionalism of company trainers. As well as one-to-one support and resources, the SBB provides training courses and workshops aimed at developing instructors’ training skills and their skills in student care.<sup>111</sup> Two recent SBB initiatives

101 Emmenegger, P. and Seitzl, L. (2020) *Social partner involvement in collective skill formation governance. A comparison of Austria, Denmark, Germany, the Netherlands and Switzerland. Transfer: European Review of Labour and Research*, 26(1), p.37.

102 Broek, S. (2022) *Radical institutional changes while maintaining strong links between VET and the labour market: the Dutch VET experience. Hungarian Educational Research Journal*, 12(3), p.320.

103 Broek, S. (2022) *Radical institutional changes while maintaining strong links between VET and the labour market: the Dutch VET experience. Hungarian Educational Research Journal*, 12(3), p.321.

104 Eurydice (2023) *Netherlands: organisation of vocational upper secondary education (MBO) – the SBB: linking up vocational education and the world of work*.

105 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.23.

106 Eurydice (2023) *Netherlands: organisation of vocational upper secondary education (MBO) – the SBB: linking up vocational education and the world of work*.

107 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.28.

108 Cedefop (2016) *Vocational education and training in the Netherlands: short description*. p.28.

109 Information from an SBB spokesperson.

110 Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB.

111 Information from an SBB spokesperson.

include a manual of quality guidance for SBB advisers, which helps them to conduct informative discussions when accrediting companies, and a work placement protocol. The work place protocol was designed by the SBB in collaboration with VET colleges, student organisations and the Ministry of Education. It is described as a high-level agreement between students, companies and training centres for all types of traineeships.<sup>112</sup> The SBB also conducts annual surveys as another means to quality assure company training. The results consistently show that students are more satisfied with the VET provided by training companies than by VET colleges.<sup>113</sup>

### ***‘The Norwegian way’ – trust and collaboration***

The traditionally strong position of social partners (employers' associations and trade unions) saw them play a key role in Norway's comprehensive reform of upper secondary education in 1994 and in the introduction of the country's hybrid 2+2 VET system. Instrumental to the successful implementation of the 2+2 model was the role the social partners played in 'mobilising firms and public enterprises to take on the required number of apprentices'.<sup>114</sup> At both the national and county level, the influence of the social partners continues and it ensures that Norway's VET provision is balanced with labour market needs.<sup>115</sup> They advise on the structure of vocational programmes, curriculum development, the examinations framework for trade and journeyman's certificates, and they are part of the mechanism for quality control and quality assurance.<sup>116</sup> The social partners form the majority on:

- the National Council for VET (*Samarbeidsrådet for yrkesopplæring* (SRY)), which steers national VET policy
- Vocational Training Councils, which give advice on the appropriate training for specific trades<sup>117</sup>
- National Appeals Boards, which are for candidates who fail their trade or journeyman's final test at county level

At the regional level, the social partners play a leading role on:

- County Vocational Training Boards
- Trade-specific County Examination Boards

Through representation on organisational and policymaking councils and boards, the social partners are key to ensuring Norway's VET provision is quality assured and is kept relevant and up to date. In addition, as members of County Vocational Training Boards, the social partners advise on career guidance, regional development and the tailoring of the region's VET provision to meet local labour market needs.<sup>118</sup> Cooperation with employer and workers' organisations is described as a 'key element of quality' for Norway's VET, with the social partners being involved at every level of decision-making and problem-solving.<sup>119</sup>

<sup>112</sup> Information from an SBB spokesperson.

<sup>113</sup> Information from an SBB spokesperson.

<sup>114</sup> Nyen, T. and Tønder, A. H. (2020) *Capacity for reform: the changing roles of apprenticeship in three Nordic countries. Transfer: European Review of Labour and Research*, 26(1), p.54.

<sup>115</sup> Cedefop (2019) *Vocational education and training in Europe – Norway: system description*. p.23.

<sup>116</sup> Cedefop (2019) *Vocational education and training in Europe – Norway: system description*. p.23.

<sup>117</sup> There are currently 10 Vocational Training Councils – one for each vocational programme taught in upper secondary.

<sup>118</sup> Cedefop (2019) *Vocational education and training in Europe – Norway: system description*. p.18.

<sup>119</sup> Information from Ministry of Education official.

Employer-owned training agencies (TAs) also play a role in quality assuring Norway's VET system. Although most regions tend to use County Vocational Boards for certifying training companies, approving new apprenticeship contracts and supervising the quality of training,<sup>120</sup> TAs can monitor and quality assure apprenticeship training at the local level.<sup>121</sup> Norway's decentralised collective skill formation system allows for 'formal standardisation in tandem with a high degree of detailed monitoring' which gives 'room for local adjustments and adaptation'.<sup>122</sup> The level of TA involvement varies from region to region, but they are 'an important intermediary organisation', overseeing the administration of apprenticeships and ensuring coordination between firms.<sup>123</sup> A study of the role of Norwegian TAs as an intermediary organisation in apprentice training found that 'hiring apprentices through a training agency comprise[s] around 80% of young people's apprentice training contracts'.<sup>124</sup>

Most who contributed to this report focused on the ways in which education departments collaborated with County Vocational Training Boards and/or directly with company representatives. However, one county education department spokesperson for VET focused on the importance of her collaboration with TAs for ensuring quality. As well as being essential for helping to secure apprenticeship contracts, the TAs in her region also conducted the statutory six-monthly checks on the apprentices they placed. The education department spokesperson explained that the TAs she worked with ensured that training companies complied with the law and provided appropriate training for apprentices to acquire the necessary competencies to pass their final examinations. In annual 'steering dialogues', she and some of the TAs reviewed administrative procedures and discussed the progress of a representative sample of apprentices. The spokesperson stressed the cooperation and trust between the two sides, describing this as the 'Norwegian way' of working. She did not make physical checks on companies and apprentices because she trusted the TAs' reports. Based on these reports, she and the TAs agreed targets for individual companies' VET provision.

The role of TAs was less central in other counties, with education department officials focusing on ways of working with the social partners chiefly through their representation on County Vocational Boards. One senior county official for VET believed that the high-quality provision in her region was largely a result of the strength of working relations between the county education department and the social partners. She stressed that the lack of social and political hierarchies in the VET system made it possible for her to reach out to local politicians and the mayor without formalities, 'We all collaborate and talk to each other. When it comes to VET, there are especially good relations, there is a lot of cooperation in this

<sup>120</sup> Nyen, T. and Tønder, A. H. (2020) *Capacity for reform: the changing roles of apprenticeship in three Nordic countries. Transfer: European Review of Labour and Research*, 26(1), p.51.

<sup>121</sup> Michelsen, S., Høst, H., Leemann, R. J. and Imdorf, C. (2021) *Training agencies as intermediary organisations in apprentice training in Norway and Switzerland: general purpose or niche production tools?* *Journal of Vocational Education & Training*, 75(3), p.528 & p.534.

<sup>122</sup> Michelsen, S., Høst, H., Leemann, R. J. and Imdorf, C. (2021) *Training agencies as intermediary organisations in apprentice training in Norway and Switzerland: general purpose or niche production tools?* *Journal of Vocational Education & Training*, 75(3), p.527.

<sup>123</sup> Michelsen, S., Høst, H., Leemann, R. J. and Imdorf, C. (2021) *Training agencies as intermediary organisations in apprentice training in Norway and Switzerland: general purpose or niche production tools?* *Journal of Vocational Education & Training*, 75(3), p.523.

<sup>124</sup> Michelsen, S., Høst, H., Leemann, R. J. and Imdorf, C. (2021) *Training agencies as intermediary organisations in apprentice training in Norway and Switzerland: general purpose or niche production tools?* *Journal of Vocational Education & Training*, 75(3), p.523.

region'. The easy communication means that employers and trade unions would respond quickly and positively, for example, when additional apprenticeships were needed. Although the TAs usually settled issues, such as disputes over training, she preferred to work with the County Vocational Training Board to resolve problems. Any apprenticeship-related problems were resolved with the help of the board. Agreements were usually reached through collaborative decision-making, although on occasion formal tribunals were necessary. For these, the board's decision was final. The official implied that her education department enjoyed especially strong relations with the social partners, saying that she preferred her region's way of working and describing it as 'based on democratic decision-making where everyone shares responsibility'.

Having the flexibility to work in ways best suited to a region's needs means that some county education departments work directly with companies. A senior county official for VET explained that his region were investing heavily in technology and that several of his VET colleges had equipment that was more technologically advanced than was available in the companies: 'We invite companies into our schools to learn about the new technology. Because we all have to work together for the good of the whole area'. The official also explained the importance of working with formal networks made up of company representatives and school educators. Networks facilitated communication between the two parties. This means that 'cooperation between the training companies and our schools is stronger', with companies able to advise schools on the direction of their VET programmes. The official stressed the importance of such networks for helping to facilitate school-to-apprenticeship transitions, which is the 2+2 model's 'weak spot'. Networks in his county also provided opportunities for company-based continuing professional development for vocational teachers. Company representatives would also go into the classroom to teach specialised skills and deliver new industry knowledge. This kind of interplay between the social partners and the education sector means there is an ongoing dialogue about developments in the technology and employment markets and what they mean for education.<sup>125</sup> Similarly, in another county, an education department spokesperson described how the networks she helped to facilitate ensured good-quality teaching. Norway's integrated upper secondary education system meant that many of these networks included both educators and social partners, providing opportunities for both parties to collaborate on approaches to vocational teaching.

### ***The holistic approach***

VET officials in Norway and the Netherlands clearly value the inter-agency collaboration that takes place in VET networks, as well as the work carried out by the range of VET councils and boards that inform policymaking at both a national and local level. The Dutch VET Quality Network, for example, is a well-respected instrument for advising VET colleges on their quality assurance systems. A VET Quality Network spokesperson said they are 'a partner at the table' when national VET policy decisions are made. This study has found that in Norway, networks are a particularly effective tool for collaborating to devise strategies for good-quality VET at the regional level.

<sup>125</sup> (Kamphuis 2019) *Examples of QA systems for VET in Europe. The Dutch National Reference Point*, p.1.

The collaborative working and decision-making by consensus that takes place in Germany's Alliance for Initial and Further Training and among board members of the BIBB, echoes the approach to policymaking and practice found in the Netherlands and Norway. Despite structural differences, the VET systems in all three countries favour an approach that gives VET stakeholders opportunities to collaborate. The trust and collaboration that characterises policy formation and practice applies equally to the approaches taken to ensure the provision of good-quality VET. Significantly, although 'quality assurance' is a concept that was recognised by our participants, they tended to focus less on formal systems of quality assurance and more on working in partnership with other stakeholders as a means of achieving good-quality VET. It seems that a holistic approach, based on trust and cooperation and supported by an ongoing local dialogue with the counties, is more flexible and therefore more sustainable than a tightly regulated approach to quality assurance. Because it is guided by stakeholders intimately involved in VET (in particular the social partners who represent the needs of industry and the world of work), what counts as 'quality' is trusted, and is therefore recognised by all parties. When all parties are invested in producing good-quality VET, a quality culture is achievable.

## PART TWO: INSIGHTS AND RECOMMENDATIONS FOR THE QUALITY ASSURANCE OF VET IN ENGLAND

As Part One showed, ensuring good-quality VET in Germany, the Netherlands and Norway is achieved through collaborative working. This applies to all levels of the VET system. While formal processes of quality assurance are used, such as an inspectorate and collecting data on completion and dropout rates, those who participated in this report placed higher value on trust and cooperation in policy formation and on shared responsibility for producing good-quality VET at an operational level.

National and local government officials, educators, VET consultants and two senior representatives of the German KWB and the German DGB all described ways to work cooperatively with other parties to ensure good-quality VET. Participants were more interested in describing how they worked, and with whom, to achieve good-quality VET than in discussing how the VET system was quality assured. Quality assurance appears to be a concept less widely used, certainly at a local level, than in England. Spokespeople at a national level in Norway and the Netherlands volunteered data on completion and dropout rates and school inspections as formal evidence of quality assurance.

In Germany, a BIBB representative explained they were more familiar with the term 'quality management'. Sabbagh and Ansmann's 2023 study for the BIBB describes a great deal of work being done by company members of Germany's largest sectoral chambers on quality initiatives for company-based training. The study highlights the value of tools that help the development and promotion of good quality, rather than instruments designed to measure the standard of quality.<sup>126</sup>

Germany and the Netherlands' dual VET systems put them in the top 10 countries in a 2020 European statistical analysis of VET employment rates.<sup>127</sup> Norway's 80% employment rate for VET graduates means it ranks in close proximity to these numbers.<sup>128</sup> The success of the three countries' VET systems in terms of employment rates makes it fair to assume that their VET is good quality, or at least the quality is ideally suited to the needs of industry.

England's VET system suffers from a host of challenges. As well as chronic underfunding, the last 45 years have seen 'government induced meso- and micro-level instability'.<sup>129</sup> As a result there have been continuous changes in ministerial personnel, institutional arrangements and programmes, and a fluctuating need for VET policy to address not just a skills agenda but also unemployment problems.<sup>130</sup> Many young people see VET as a poor second to higher education. Of 2,005 people surveyed by the Social Market Foundation, almost 50% of participants aged

<sup>126</sup> Sabbagh, H. and Ansmann, M. (2023) *Quality initiatives of intermediary institutions – the provision of the Chambers*. Academic Discussion Papers. BIBB. pp.38-9.

<sup>127</sup> Eurostat (EU-LFS 2020), cited in EU Commission, Employment, Social Affairs and Inclusion (2022) *Vocational education and training: skills for today and for the future*. Publications Office of the European Union. p. 10.

<sup>128</sup> Directorate for Education and Training, Norway (accessed 2024) *Employment of graduates – sorted by education programme*.

<sup>129</sup> Keep, E. (2006) *State control of the English education and training system – playing with the biggest train set in the world*. *Journal of Vocational Education and Training*, 58(1), p.60.

<sup>130</sup> Keep, E. (2006) *State control of the English education and training system – playing with the biggest train set in the world*. *Journal of Vocational Education and Training*, 58(1), p.60.

between 18 and 24 said they would choose university over vocational education.<sup>131</sup> The Social Market Foundation argued that in addition to higher levels of funding, England's VET system needs 'closer collaboration between different educational institutions, local and national government and employers to develop pathways that work best for learners'.<sup>132</sup>

### ENGLAND – A VET SYSTEM WITHOUT SOCIAL PARTNERSHIP

Unlike the Netherlands, Germany and Norway, and despite various attempts, historically England has struggled to develop a sustainable system of social partnership in VET governance and quality assurance. The Industrial Training Act 1964 made it possible for economic sectors to set up Industrial Training Boards (ITBs) to promote VET in their sectors and which consisted of tripartite government, employer and trade union representation. The intention was to spread apprenticeship training to sectors beyond those where it had traditionally flourished. The Industrial Training Act 1964 had only limited success and few of the ITBs remain today. Most well-known, perhaps, is the Construction Industry Training Board but this no longer has trade union representation. Pemberton has commented on the lack of enthusiasm for the ITB approach, which contributed to the limited success of the Industrial Training Act.<sup>133</sup>

The Manpower Services Commission was set up in 1973 to coordinate employment and training services in the UK. The 10-member body consisted of representatives from government, local authorities and trade unions. Responsible for a variety of programmes, including the Youth Opportunities Programme and the Youth Training Scheme, it was abolished in 1987 and eventually replaced by localised Training and Enterprise Councils. Once again, social partnership turned out to have limited support from all the parties involved.

The UK Commission for Employment and Skills (UKCES) was established in 2008 and closed in 2017. It was led by 30 commissioners from business, trade unions and education, employment and skills academics and professionals. Its principal functions were to develop labour market intelligence, promote employer investment in skills and provide strategic advice and insight on skills and employment issues throughout the UK. The Institute for Apprenticeships (now IfATE) was established in 2017 and has a remit to 'work with employers to develop, approve, review and revise apprenticeships and technical qualifications'.<sup>134</sup>

It is probably not helpful to speculate as to the limited success of social partnership in the English context. Commentators, such as Pemberton,<sup>135</sup> have noted the lack of enthusiasm on the part of social partners. Winch<sup>136</sup> has noted the need for longstanding relationships of trust as a prerequisite of durable relationships of this kind that are difficult to establish in the often conflictual environment of industrial relations in the UK. It should also be noted that the Manpower Services

131 Social Market Foundation (2021) *Not just other people's children: what the public thinks about vocational education*. p.4.

132 Social Market Foundation (2021) *Not just other people's children: what the public thinks about vocational education*. p.9.

133 Pemberton, H. (2001) *The 1964 Industrial Training Act: a failed revolution*. A paper presented in the new researchers section of the conference of the Economic History Society, Bristol, 30 March 2001.

134 IfATE (accessed 2024) *What we do*.

135 Pemberton, H. (2001) *The 1964 Industrial Training Act: a failed revolution*. A paper presented in the new researchers section of the conference of the Economic History Society, Bristol, 30 March 2001.

136 Winch, C. (2021) *VET between State and Market. England as an extended natural experiment in VET governance*. In, Gonon, P. and Buerge, R. (eds) *Governance Revisited Challenges and Opportunities for Vocational Education and Training*. Peter Lang. pp.53-80.



Commission and the UKCES were 'apex' bodies working at national level.<sup>137</sup> The ITBs were also apex organisations in their respective sectors. It is harder to find examples of the regional and local cooperation on VET issues like that found in Europe and which have been noted in this report. A notable exception being the Electrical Training College that was set up by the Electrical, Electronic, Telecommunications and Plumbing Union (EETPU) and run for the benefit of members and the wider sector including employers. However, this was closed when the EETPU amalgamated with a larger union. Unfortunately, there is little documentation publicly available about the college.

Our study of Germany, the Netherlands and Norway shows that the meaningful involvement of employers and other social partners in VET policymaking is a key factor in producing good-quality VET. In all three countries, VET benefits from the active involvement at every level of employers and other social partners in the design and quality assurance of VET. It is also significant that policy reforms have tended to increase social partnership involvement and collaborative working, both across sectors and between state and VET stakeholders. In contrast, in England, the state's power to intervene in and control the publicly funded VET system has increased.<sup>138</sup> Although the notion of employer leadership 'has been a recurrent element in government rhetoric over the past quarter century, it is unclear what influence employers actually exert over policy'.<sup>139</sup> England's VET system appears to be out of step with the European approach. As Keep noted in 2006:

*... until the state 'lets go' of some element of control it will be trapped into having to do more and more, as other actors take a passive role and fail to develop their capacity to act as strong partners in the [VET] system.*<sup>140</sup>

## WHAT INSIGHTS CAN BE TAKEN FROM THIS PROJECT TO ENHANCE THE QUALITY OF VET IN ENGLAND?

It is always perilous to assume that a policy that works in country A will work in country B and therefore it would not be wise to assume that the quality assurance systems examined in this report have immediate relevance to improving the quality assurance of VET in England. Each country's quality assurance system is embedded in its national VET system which in turn is embedded in the economy, culture and political system of that country. Sometimes factors that are difficult for a researcher to see are critical to the success of visible processes.<sup>141</sup> It cannot be assumed that the same factors are present in England.

That said, it is still worth looking at features of the quality assurance systems of these countries and of the EU, to start a discussion about if and how they could be adapted for use in the English system.

<sup>137</sup> Apex bodies are bodies that play a coordinating role at national or sectoral levels.

<sup>138</sup> Keep, E. (2006) *State control of the English education and training system – playing with the biggest train set in the world*. *Journal of Vocational Education and Training*, 58(1), p.55.

<sup>139</sup> Keep, E. (2006) *State control of the English education and training system – playing with the biggest train set in the world*. *Journal of Vocational Education and Training*, 58(1), p.56.

<sup>140</sup> Keep, E. (2006) *State control of the English education and training system – playing with the biggest train set in the world*. *Journal of Vocational Education and Training*, 58(1), p.47.

<sup>141</sup> Cartwright, N. and Hardie, J. (2012) *Evidence-based policy: a practical guide to doing it better*. Oxford: Oxford University Press, p.75.

This section highlights the features of the quality assurance systems of the EU, Germany, the Netherlands and Norway that we think could be relevant to the English context.

### ***1. Social partnership and associated high levels of trust***

Germany, the Netherlands and Norway all rely on a form of social partnership to ensure quality. Employer associations, trade unions, regional and state administrations work together with a joint commitment to ensuring quality – even though their interests do not always coincide. Where they do not, they tend to seek collective solutions through compromise and discussion. In this way, all parties have a common interest in the operational quality of the system. Quality assurance is not so much a solely, externally driven process as a feature of the day-to-day running of the VET system itself. Although the UK is an outlier in Europe in terms of its social partnership structures,<sup>142</sup> it has in the past experimented with forms of social partnership in VET, most notably after the 1964 Industrial Training Act<sup>143</sup> was introduced and during the brief period of the UKCES, between 2009 and 2017.

### ***2. Proper enforcement of existing regulations***

There is some disturbing evidence<sup>144</sup> that existing legislation and regulation is being inadequately enforced, which is leading to a decline in the quality of VET. The use of social partner scrutiny of the operational practices of VET such as on-the-job and off-the-job learning, assessment, occupational profiling and qualification design could go some way to mitigating such problems that can arise through a lack of political will, interest group lobbying or lack of funding.

### ***3. A limited use of market mechanisms as a means of securing accountability***

England has made extensive use of market and quasi-market mechanisms in VET to ensure accountability and quality. These have included competitive bidding, institutional competition and external publicised inspection. These practices arose within the framework of public choice theory<sup>145</sup> and its implementation through new public management.<sup>146</sup> Although these approaches have also gained some traction within Europe,<sup>147</sup> they have not come to dominate quality assurance in the way that they have in England. It is worth examining whether new public management techniques are impeding rather than enhancing effective quality assurance in VET.

### ***4. A stable and well-understood system that undergoes evolutionary reform***

None of the VET systems that we have looked at are static. All adapt to changing social, economic and technological pressures. However, they do this without making frequent large-scale reforms to qualification design, the mode of VET (work- or college-based) or the form of assessment, thus ensuring stability. Adaptations are

<sup>142</sup> For example see: Conchon, A. (2013) *Workers' voice in corporate governance: a European perspective*. London, Trade Union Congress.

<sup>143</sup> Pemberton, H. (2001) *The 1964 Industrial Training Act: a failed revolution*. A paper presented in the new researchers section of the conference of the Economic History Society, Bristol, 30 March 2001.

<sup>144</sup> Richmond, T. and Regan, E. (2022) *No train, no gain*.

<sup>145</sup> Public choice theory assumes 'that although people acting in the political marketplace have some concern for others, their main motive, whether they are voters, politicians, lobbyists, or bureaucrats, is self-interest'. Shaw, J. S. (accessed 2024) *The concise encyclopedia of economics: public choice theory*. See also: Stretton, H. and Orchard, L. (1994) *Public goods, public enterprise, public choice: theoretical foundations of the contemporary attack on government*. London: MacMillan.

<sup>146</sup> 'The NPM reform narrative includes the growth of markets and quasi-markets within public services, empowerment of management, and active performance measurement and management'. Ferlie, E. (2017) *The new public management and public management studies*. Oxford Research Encyclopedias, Business and Management.

<sup>147</sup> For Germany see: Kuhlee, D. (2017) *Control, new control, governance...? On guiding principles, design patterns and functional mechanisms of control approaches in vocational training*. In: Bolder, A., Bremer, H. and Epping, R. (eds) *Education for Work under New Governance*, pp.45-72.

given a chance to bed down and the public are familiar with the system and trust it. Just as important, those who use and work within it are also familiar with its strengths and weaknesses and are thus in a position to implement incremental change where necessary. English VET is characterised by frequent changes being made to its organisational structures, reporting protocols, qualification design and regulations. This impedes the embedding of stable and participatory quality assurance mechanisms.

### ***5. External peer review***

Both the European Training Foundation (ETF) and EQAVET use elected-peer review as quality assurance mechanisms. While individual countries are understandably protective of their own quality assurance mechanisms, they also recognise that it is possible to overlook features of their system that they are over-familiar with and which could benefit from improvement. Most EU countries make use of peer review, employing experts from other countries to look at aspects of their VET that they judge may require attention. Response to recommendations is not mandatory, but the suggestions may prompt debate and reflection that lead to change in quality assurance practices.

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