



# **COUNTRY REPORT**

## **Including of non-formal sector qualifications in the NQF in Hungary**

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## Foreword

The development of Hungarian Qualifications Framework (HuQF) and its referencing to the EQF was accomplished in spring 2015. During the development of the HuQF educational attainment levels in general education, state recognised qualifications listed in the National Vocational Qualifications Register (NVQR) and qualifications obtainable in higher education were linked. During the political reconciliations with the experts following the first phase of development it was stated that the next steps of work with the framework should aim at implementation, as well as the qualifications of formal (e.g. postgraduate specialisation trainings) and the certificates of non-formal (adult training) sectors, which have not been linked to the framework yet.

The above intents were determinant in joining the NQF-In project. As presently there is no mature system for linking non-formal certificates (explicit policy, order of procedure, methodology, etc.) therefore the implementation of the project and the knowledge accumulated during the preparation of the Country Report can contribute to the experts' discussion, which is very important from the aspect of operating the HuQF, as well as establishing and fine-tuning a system for linking non-formal certificates.

## Abbreviations and acronyms

**Table 1.** A list of the abbreviations and acronyms used in the country report.

| Abbreviation in English | Term in English  | Term in Hungarian                                  | Abbreviation in Hungarian |
|-------------------------|--|--|---------------------------|
| ATEC                    | Adult Training Expert Committee  | Felnőttképzési Szakértői Bizottság                 | FSZB                      |
| CVET                    | Continuing vocational education and training                             | Szakmai továbbképzés                               | SZT                       |
| EA                      | Educational Authority  | Oktatási Hivatal                                   | OH                        |
| EOR                     | Educational and Outcome Requirements                                     | Képzési és Kimeneti Követelmények                  | KKK                       |
| HCCI                    | Hungarian Chamber of Commerce and Industry                               | Magyar Kereskedelmi és Iparkamara                  | MKIK                      |
| HCSO                    | Hungarian Central Statistical Office                                     | Központi Statisztikai Hivatal                      | KSH                       |
| HDEC                    | Hungarian Development and Educational Committee                          | Magyar Fejlesztési és Képzési Bizottság            | MFKB                      |
| HuQF                    | Hungarian Qualifications Framework                                       | Magyar Képesítési Keretrendszer                    | MKKR                      |
| ISCED                   | International Standard Classification of Education                       | Nemzetközi egységes oktatási osztályozási rendszer |                           |
| IVET                    | Initial vocational education and training                                | Nappali iskolarendszerű szakképzés                 |                           |
| LLL                     | Lifelong Learning  | Élethosszig tartó tanulás                          |                           |
| LPR                     | Language Programme Requirement   | Nyelvi programkövetelmény                          | NYPK                      |
| NOVETAL                 | National Office for Vocational Education and Training and Adult Learning | Nemzeti Szakképzési és Felnőttképzési Hivatal      | NSZFH                     |
| NQC                     | National Qualification   | Nemzeti Képesítési                                 | NKB                       |

|       |  |  |       |
|-------|--|--|-------|
|       | Committee                                      | Bizottság                                    |       |
| NVATC | National Vocational and Adult Training Council | Nemzeti Szakképzési és Felnőttképzési Tanács | NSZFT |
| NVQR  | National Vocational Qualifications Register    | Országos Képzési Jegyzék                     | OKJ   |
| SRQP  | Social Renewal Operational Programme           | Társadalmi Megújulás Operatív Program        | TÁMOP |
| VET   | Vocational Education and Training              | Szakképzés                                   |       |
| VER   | Vocational Examination Requirements            | Szakmai vizsgakövetelmények                  | SZVK  |
| VPR   | Vocational Programme Requirement               | Szakmai programkövetelmény                   | SZPK  |

## Preparation of the report

The development of the Hungarian Qualifications Framework is still in progress, and its implementation is in the initial phase. Due to this, during the preparation of the country report we could not rely on the description of an operating system. Therefore, we linked the preparation of the country study to a research, in which we intended to reveal the functioning of and interests in the adult training market from the aspect of the further development and operation of the HuQF.

In Hungary no regulation for the procedure of linking the qualifications obtainable in formal training has been prepared yet, and legal obligation for linking covers only a certain group of non-formal certificates. In 2016 135 (from 154) vocational program requirements were linked to the HuQF levels have been accomplished with involvement of experts.

The aim of the research linked to the preparation of the Country Report is to map the market of the trainings provided outside the school system, where certificates obtainable are non-state recognised qualifications, and provided in a so called non-formal learning setting, and to examine what certifying documents are used, what their status and labour market value are, and how the stakeholders are interested in linking certificates obtained in non-formal training to the HuQF.

The research basically relied on semi-structured deep interviews. The subjects in the investigation with interviews are stakeholders participating or interested in the operation of the training market, training provider companies, managers and competent employees of training provider companies, HR staffs, managers and experts responsible for training and competence development of medium sized and big companies, as well as experts and representatives of professional interests in the Hungarian Chamber of Commerce and Industry (HCCI) having an insight into the whole training market. Among the certificates and certifying documents obtainable in the Hungarian training market, the present research mainly focusses on the certificates being relevant from a labour market aspect, and it only tangentially mentions the certificates obtainable in free time programmes or programmes for elderly people. While making the interviews, we endeavoured to include interview subjects and companies from several counties in addition to Budapest. Also, due to the variety of the training market, stakeholders from several sectors were asked in different topics, according to preliminarily determined focus points. Certificates issued in the fields of IT, sport, and health was a priority group.

The research was supplemented by a pilot linking of 13 selected certificates to the levels of the HuQF. The aim of test linking was to identify the questions to be answered that can emerge in linking non-formal certificates.

When preparing the Country Report, we relied on studies in the topic of adult training, and on secondary analysis of the regulatory and institutional environment of adult training with a focus on the Country Report. For the preparation of the Country Report, a background study was prepared on the characteristics and legal regulation of Hungarian adult training.



## Basic terms

*As the most important terms characterizing the Hungarian system can be interpreted in their relation to one another, the related terms are described together.*<sup>1</sup>

### **Qualification and Certification**

Based on current legal regulations, the types of documents issued may be the following:

- Vocational Qualifications recognized by the State;
- Certificates issued in the non-formal sector (which, in Hungarian meaning, certifies the learning outcomes based on some sort of assessment, examination;
- Certification of Attendance, proving one's participation in the training.

The use of the latter two is not always consistent.

### **Formal training – Non-formal training**

In Hungary, formal training includes programmes organised within the school system (primary, secondary level and higher education), as well as VET programmes providing state recognised NVQR qualifications. It also includes the trainings provided outside the school system that allow obtaining qualifications included in the National Vocational Qualifications Register (NVQR). All other trainings outside the school system shall be considered as non-formal trainings. However, the above two concepts are mainly used among experts, and they are not typically used in everyday life.

### **Training provided within the school system – Training provided outside the school system**

The above concepts refer to each other. Training provided within the school system means general education being compulsory until 16 years of age, secondary level education including IVET and higher education.

A basic concept of the adult training act(s) is the training provided outside the school system, which means trainings, continuing trainings (mainly aiming at a profession) for adults who have completed their compulsory school attendance. (Adult Training Act does not cover the whole field of adult training, i.e. it relates to a certain segment of trainings provided outside the school system.)

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<sup>1</sup> In Hungary, there is no clear, definite and fully accepted system of concepts in the field of adult education and training. The different documents do not always use the terms in the same meaning. Adult education and adult training are considerably structured and they can be grouped from several (legal, institutional, financing) aspects.

## **Adult education – Adult training**

The above two concepts, in the most general meaning refer to the training of persons who have come of age, however, it is used in a more restricted interpretation by some documents.

Adult education belongs to the group of second-chance type programmes. Typically, it is organised in the form of evening and correspondence (rarely e-learning) courses, mainly in schools, and regarding the content and the obtainable qualifications it has the same status as full-time education provided in the age of compulsory school attendance.

Adult training happens outside the school system. Regarding its aim, it can be general, language or vocational. Its typical feature is that participants of the training do not have a learner or student status with the training institute, and the relationship between the training participant and training provider is regulated by an adult training agreement (with a content as stipulated by law). A person may participate in adult training if the person has completed his or her compulsory school attendance (although any person even of an age of compulsory school attendance may participate in non-supported adult training programmes available in the training market).

## **Adult training services**

Based on the regulations of the Adult Training Act, these are services related to adult training to tailor trainings to individual needs, to improve training efficiency, or to help employment. Its forms include assessment of prior learning, consultation on career orientation and career guidance, surveying training needs and consultation on training, consultation on employment and teaching job searching techniques.

## **Trainings regulated by the Adult Training Act**

Only those training programmes are regulated by the effective Adult Training Act (2013) that are financed by a state source or EU projects, or that the state is responsible for.

The above programmes are divided into 4 groups by the law:

- type A training programmes providing state recognised vocational qualifications (included in the National Vocational Qualifications Register, NVQR)
- type B trainings that are the so-called “other vocational trainings” or those registered by the Hungarian Chamber of Commerce and Industry (HCCI), whose vocational programme requirements (VPRs) have to be accepted in a special procedure
- type C trainings cover foreign language courses (based on language programme requirements)
- type D trainings are the so called “other supported trainings” (e.g. catch-up programmes, general competence development trainings, supported workplace trainings). These trainings are not based on any programme requirements.

As stated by the act, training providers are entitled to organise training programmes belonging to the above types, or to provide services related to adult training activity (e.g. assessment of

learning outcomes acquired in prior learning) if they are included in the register of institutions providing adult training.<sup>2</sup>

### **Partial qualification – Full qualification – Add-on**

These are the three formal (state-recognized) VET qualifications related to one another, obtainable in the vocational education and training system and listed in the NVQR.

#### **Partial (NVQR) qualification**

It is constituted by some modules of a qualification stated by the vocational examination requirements (VERs), and its holder is entitled for filling at least one scope of work.

#### **Full (NVQR) qualification**

It is a qualification included in the National Vocational Qualifications Register (NVQR). The basic data of the training (type, level, field of study of the qualification, inclusion in the trade group, required completed school education, etc.) are determined by the Register, whereas the detailed requirements and description are included in the decree for the vocational examination requirements related to the concerned qualification (issued by the Minister being responsible for the concerned qualification).

#### **Add-on (NVQR) qualification**

It is a training to supplement an already obtained NVQR qualification. Its holder is qualified for filling an additional scope of work. The vocational examination requirements include the qualification modules which the training content is added on, and they also determine the modules it is constituted by. For example, the qualification of a geriatric and chronic patient nurse or infant and child nurse can be added on the qualification of a nurse.

### **Vocational Examination Requirements (VERs) – Vocational Programme Requirements (VPRs) – Language Programme Requirements (LPRs) (in adult training)**

Vocational examination requirements are central training documents issued by the Minister responsible for a qualification in a legal regulation. The publication of the decree on the VER is a criterion for starting the training provision, and organising the vocational examination. These decrees include the maximum training period required for obtaining a qualification (the number

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<sup>2</sup> By doing so the legal regulation “monopolized” the expression adult training activity for the activities regulated by the Adult Training Act. However, the question remains: what term should/might be used for the activities happening outside the scope of the Act, having a completely identical content, and being highly appraised by the labour market, performed by non-registered business enterprises providing training as a service in the free adult training market. Presently this can be named only in a very complicated way (adult training activity not regulated by the Adult Training Act).

of VET grades, the number of training hours), the ratio of theoretical and practical training periods, in vocational secondary schools the number of VET grades, the period of initial vocational education and training, and the possibility of organising a level examination assessing the success of practical training.

Based on the Adult Training Act of 2013, vocational programme requirements describe the training requirements of non-formal trainings (the so called type B or other vocational trainings), which are non-state recognised, however, supported by the state and therefore subjected to authorisation and registration (their function is similar to the role of VERs to provide a foundation of qualifications).

In the case of supported language trainings, organising the training is subjected to authorisation, and it shall be based on the authorised language programme requirements. (LPRs) are recorded (and published on the Internet) by the National Office for Vocational Education and Training and Adult Learning (NOVETAL).<sup>3</sup>

### **Authority regulated training**

It is a training whose content and aim are regulated by the law, and which aims at obtaining a qualification not included in the NVQR. In the lack of authority regulated training a given work activity specified by the law cannot be performed. or the activity can be performed. After the accomplishment of an authority regulated training, the activity can be performed according to higher requirements compared to the professional level before the training. (Section 16 of Adult Training Act).

### **Higher vocational education and training**

It is a training form built on the secondary school leaving examination, whose aim is to obtain a higher level qualification. This type of VET is provided in higher education institutions. These trainings usually last for 2 years, and include the subjects to convey higher level of knowledge related to the concerned qualification; however, they mainly focus on conveying vocational knowledge and skills. Credit points obtained in higher vocational education and training can be recognised later – in further studies – in the credit points of the higher education bachelor programme (BSc) so the period of the bachelor programme can be shortened. These programmes are linked to level 5 of the Hungarian Qualifications Framework.

This training type is not identical to post-secondary non-tertiary trainings, which are VET programmes built on the secondary school leaving examination, provide an (ISCED 454 level) qualification included in the NVQR, and not organised in higher education institutions.

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<sup>3</sup> <https://www.nive.hu/>

# 1. Historical context

In Hungary, by tradition the education and training sub-sectors are highly separated. They have their own legal regulation systems determining input, process and output regulations, their separated institutional settings and policy making and implementation structures. The sub-sectors of the education and training system are over-regulated in several aspects and there are no real intersectoral policy or administrative instruments that seem to have influence.

In Hungary, before the discussion started at European level to elaborate the Recommendation of the European Parliament and of the Council of 23 April 2008 on the establishment of the European Qualifications Framework for lifelong learning, there was no definite government intention to develop a comprehensive qualification framework covering different subsectors of education and training. The government policy in this field mainly followed the international discourse.

The development of the HuQF can be divided into three periods. The first period of development (2006-2008) was characterised by international events and their impacts on Hungarian thinking. The extensive knowledge gathering and consultations resulted in a Hungarian position paper, discovering the benefits of a qualifications framework and learning outcomes approach. Then following up the European recommendation on EQF, the Hungarian Government decided to join the European EQF community and to create an NQF.

The second period covered (2009-2011) a Social Renewal Operational Programme (SROP) project with support of the European Social Fund, which aim was to develop the grid itself, in consultation with the social stakeholders. This work resulted in the acceptance of the grid.

In the third period of development (2012-2014), three SROP projects were launched, with the more detailed tasks of:

- widening further the social consultation (than in the second phase);
- familiarizing even more people with the learning outcomes approach,
- linking qualifications to HuQF levels;
- channelling back the results of referencing framework levels and linking qualifications.

The development of the Hungarian Qualifications Framework has been carried out by three Social Renewal Operational Programme (SROP) projects: one responsible for general, one for higher, one for vocational and adult education. Therefore, the structure of responsibilities and the process of consultations had to be established in a way that information sharing, harmonisation of working methods and the methodology of linking between projects are ensured. In this phase of development only those qualifications recognized (and regulated) by the state are linked to QF levels.

The system of general education in Hungary is strongly dominated by a curriculum-content based control. Within this, various approaches of the education policy had an impact on curriculum-content developments, which resulted in the inclusion of competence-based approach. The description of the learning-teaching process, the determination of the sequence of curriculum contents, as well as the wording of educational aims and tasks became a central

element of state core curricula. Process control focussing on competence development is even more typical of the National Core Curricula of 2003 and 2006. The latest National Core Curriculum published in 2012 determines common cultural contents. Learning outcomes, i.e. requirements or conditions for progression as defined by general education were worded at the level of framework curricula and secondary school leaving examination requirements, published by the minister responsible for education in the regulatory documents. Secondary school leaving examination requirements are learning outcome-oriented. Learning outcomes, important from the aspect of linking to the levels of the Hungarian Qualifications Framework, can be found in these documents now as well.

In the VET system *input, process and outcome regulatory elements* are also present. The main regulatory documents of the qualifications that are included in the NVQR are the Act on VET and its government decrees and ministerial decrees. The decrees on the vocational (professional) and examination requirements for the qualifications include the requirements of the complex vocational examination, whereas the detailed vocational standards can be found in the modules of vocational requirements published in the relevant government decree. The vocational requirements set for the solution of the tasks to be carried out during the practice of a profession. They also include the levels, contents, and quality of the competences required for the employment and during the work (job requirements). In 2004, the development of the NVQR – supported by ESF – was based on analysis of job profiles. According to the next developmental phase in 2011, the profiles became competence-based, i.e. in addition to the vocational task profile the requirements in the system of social, methodological and personal competences were also described. The competence underlying the NVQR is activity-oriented, and it considers competence to be an acting potential. The dimensions of the competence model of the NVQR: the vocational, personal, and methodological competences, i.e. its feature profile contents are important units of the acting competence; however, these units do not have the task to specifically reflect to a vocational function or role, but they contribute to the successful acting in the work context together so they serve the definition of the training objective to a greater extent. The occupational feature profile used for the competence description is not integrally related to the specific tasks, and they are not their pre-requisites. The relations among the individual categories of the two types of description mean the real difference between the systems of the HuQF and the National Vocational Qualifications Register. In the HuQF the relations among the learning outcome-related statements at the same level are very close, they connote and supplement one another, and they are also coherent. In the NVQR these relations are co-ordinative and taxonomic.

In higher education, the compliance with the qualification framework across the European Higher Education Area (EHEA QF) started 10 years ago. The regulation incorporated the use of the Dublin descriptors already in 2005, and it started shifting the regulatory input and content elements being previously typical in the regulation of qualifications towards the outcome by reducing and extending the input and content elements and by introducing the outcome elements. The regulation of the qualification and the training programmes leading thereto are separated in the Hungarian regulation. The National Higher Education Act determines the main features of the qualifications (type, levels, typical programme period, and number of credits) and

the ministerial decree prescribes the education and outcomes requirements of higher education courses.

Qualifications systems of education and training sub-sectors are highly regulated and fragmented. Their own structure, characteristics, standards and quality assurance systems have been developed different times and reflected to sectoral demands. The development of a comprehensive qualifications framework started with the outside pressure of conformity with EQF processes and not from national policy intentions. Education and training sub-sectors keep their regulatory and institutional authorities over their qualifications. The sub-sectoral qualifications' systems were pulled under the umbrella of the HuQF comprehensive framework but the division between them remained strong.

## 2. National qualifications framework – basic premises

The sub-sectors' qualifications systems are fragmented, they have their own structure, policy and management processes, quality assurance and evaluation systems and no links between them can be identified. Legal regulations determine the entrance criteria – level and type of educational attainment and/or qualification – to a qualification and the preconditions to make transitions possible between qualifications' sub-systems. The National Vocational Qualification Register and the higher education qualifications system can be perceived as sectoral framework with levels and descriptors but for the general education the solely outcome requirements for secondary school leaving examination with the National Core Curriculum, which defines learning outcomes to some extent, cannot be interpreted as any kind of framework.

The Hungarian Qualifications Framework was developed as a communicative framework; the work mostly followed the EU trends and requirements. The HuQF can be characterized as a competence-framework: it has eight levels and four descriptor categories: knowledge, skills, autonomy and responsibility and attitude.<sup>4</sup> The development of levels and descriptors was mostly carried out by pedagogical experts; therefore, the pedagogical aspect is more emphasized than the labour market ones.

State recognised vocational qualifications, higher education qualifications and primary and secondary educational attainment were linked to the HuQF as a part of the previously mentioned ESF project to support the implementation of the development process. Following linking, so far no regulation for the maintenance and operation of the HuQF has been adopted to provide the regulatory, institutional and financial background of the function of HuQF legitimated by the government.

Sectoral separation is strong regarding the qualification systems and their regulations, there is no uniform methodology for linking to the HuQF, and the authorities responsible for the qualifications perform their linking in their own institution system, in compliance with their order of procedure, regulation standards, quality assurance framework, only relying on the compulsory consultation within the state administrative conciliation procedure.

The HuQF is mainly a metaframe due to its abstraction level and the general nature of descriptors, which could only help the inclusion of the qualifications issued in the different education and training sectors into the uniform frame with different guidelines and sectoral, sub-

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<sup>4</sup> For more details, please, refer to the Hungarian Referencing Report:

[https://www.oktatas.hu/pub\\_bin/dload/kepesitesek/referencing\\_report\\_HuQF\\_EQF.pdf](https://www.oktatas.hu/pub_bin/dload/kepesitesek/referencing_report_HuQF_EQF.pdf)



sectoral descriptions that could also improve the transparency and understandability of the relations among the qualifications.

The impact of HuQF on the whole system is visible at a governmental decision making and experts' level: as seen above, the new approach did have an impact on the education and training system and due to the lack of regulation for the introduction of the framework, the effect of the HuQF on the outcome regulations and their standards is insignificant. The spread of new idea of the framework is rather slow, end-users are not aware of its use yet.

## 3. Institutional setting

### 3.1. Governance and management of qualifications

The management of the Hungarian educational and qualifications system belongs to the **Ministry for National Economy** (vocational and adult education) and the **Ministry of Human Capacities** (general and higher education). However, depending on the economic subsector, the responsibility concerning vocational qualifications may be shared between Ministry for National Economy and other ministries (for example the Ministry of Agriculture in case of agricultural qualifications). The traditional division between educational subsectors is visible in the institutional and management system.

From the point of view of non-formal sectoral qualifications, the Ministry for National Economy and its background institutions' responsibilities are more important; therefore, these are more detailed in this chapter.

In details, the **Minister for National Economy** has the following functions:

- to establish and operate the National Qualifications Committee;
- to oversee the Vocational and Adult Training Directorate of the National Labour Office;
- to compile the national module map and provide for publication;
- to set up the development and training committees of the capital and the counties, respectively, and provide for the conditions of their operation together with the economic chamber;
- to commission the drawing up of the mandatory vocational training framework curricula by vocational qualification in vocational school and by sector in secondary vocational school,
- to provide legal regulation and management of the adult training system,
- to make decisions of the second degree related to the authorisation and control of adult training activity, and
- to elaborate training and support programmes for the adult training and labour market.

**National Vocational and Adult Training Council (NVATC)** helps the Minister responsible for VET and adult training perform the minister's tasks related to VET and adult training. NVATC is operated as a national body to prepare decisions, to make proposals, and to give opinions in the professional field.

In the new regulation system of adult training, the most important institution to perform the operative tasks in the adult training authority's activity is **National Office of Vocational Education and Training and Adult Learning (NOVETAL)**, controlled by Ministry for National Economy (before 15 December 2014, the former National Labour Office).

NOVETAL is involved in planning, implementing and monitoring the Ministry of National Economy's VET policy and regularly make reports on the results. Within the number of tasks delegated to the agency NOVETAL manages over 360 VET schools, thus reaching directly about a 16 000 teachers and 200 000 young people since 1 July 2015. NOVETAL operates various expert committees on VET and AL. These committees, existing communication channels and professional cooperation projects ensure that all relevant stakeholders, policy makers, and social partners can be reached when updating and disseminating information and data on VET.

NOVETAL provides for:

- the tasks related to the authorisation, control and sanctioning of the activity performed by adult training institutions,
- the registration of (authorised) adult training institutions,
- the task related to the registration of LPRs (in adult training),
- the tasks related to the authorisation, control and sanctioning of adult training expert activity, and the maintenance of the list of adult training experts.
- processing and publishing the adult training data of the National Statistical Data Collection Programme.

The above tasks are related to adult training, however, it has several other tasks related to VET, and one of the most important ones among these is that since 1 July 2015 it has performed maintainer's tasks of the VET institutions put into the maintenance of the Ministry of National Economy.

The work of NOVETAL related to the tasks of authorisation and control of adult training institutions' activities, registration of LPRs, and adult training experts' activities is helped by an **Adult Training Expert Committee (ATEC)**, consisting of six adult training experts<sup>5</sup>.

NOVETAL collects and publishes validated data on vocational qualifications, which are available on the public website of the Agency. NVQR, issued in a government decree (reviewed and updated regularly), contains basic data on state recognised qualifications. Vocational examination requirements are issued in ministerial decrees and contain detailed information on regulations and requirements of each vocational qualification. The so-called "National Module Map" is based on a government decree and it contains detailed description of knowledge, skills and competences of qualifications by modules.

NVQR<sup>6</sup> was first published in 1994. It has been thoroughly revised and substantially renewed in 2004-06 and the last version was published in 2016 with 760 (full, partial and add-on)

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<sup>5</sup>The list of members is available on the NOVETAL website:  
[https://www.nive.hu/index.php?option=com\\_content&view=article&id=500](https://www.nive.hu/index.php?option=com_content&view=article&id=500)

qualifications belonging to 22 trade groups. The 150/2012 government decree defines the procedure of modifying NVQR. Anyone can recommend the deletion, modification, or the introduction of a vocational qualification. The proposal must provide detailed justification for the recommended modification, and be supported by:

- a detailed discussion on whether the proposed modification is well-founded which
- should also cover all alternatives assessed in the process of reaching that conclusion,
- the estimated number of expected training participants per year,
- a list the training providers willing to provide practical and theoretical training, and
- a forecast of the national employment service on the number of jobs that can be taken with the qualification proposed.

Vocational examination requirements<sup>7</sup> of the NVQR qualifications are published in decrees by the ministries responsible for vocational qualifications. The VERs include competences and expected learning outcomes relevant to the world of work for each module.

The National Module Map<sup>8</sup> includes a list and descriptions of the modules of the qualifications in the effective National Vocational Qualifications Register, as well as it shows how qualifications are linked to one another. It helps in getting information on the modules of vocational requirements related to the qualifications.

**Hungarian Chamber of Commerce and Industry, HCCI**, defined as a public body and so also having administrative power got an important role in the operation of the regulation system of 2013 for adult training. The Chamber, being a professional organisation and generally representing the interests of the participants of economy, has proper information on and insight into the needs of economy; therefore, it is able to present the contentual and structural needs related to the business/economic trainings. It also plays an important role in taking economic needs into account when determining the supports for trainings.

Accordingly, in the issues related to vocational trainings, the Adult Training Act vests material power, in certain cases exclusive decision-making competences in the Chamber, which thus can properly represent the interests of economy in adult training. This is the reason why the new Act on Adult Training also amended Act CXXI of 1999 on economic chambers, whose new Point e) of Section 9 says:

*“Economic Chambers shall provide for their tasks as stated by the law on VET and its executive order, and the law on adult training and its executive order, as well as they shall organise and provide master craftsman trainings and master craftsman examinations in relation to the development of economy, and in cooperation with the national organisations for the representation of economic interests.”*

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<sup>6</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=532](https://www.nive.hu/index.php?option=com_content&view=article&id=532)

<sup>7</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=501](https://www.nive.hu/index.php?option=com_content&view=article&id=501)

<sup>8</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=531](https://www.nive.hu/index.php?option=com_content&view=article&id=531)  
or <http://site.nive.hu/orszagosmodulterkep/>

Based on the Adult Training Act, HCCI shall:

- operate a committee with five members to make decisions on the registration of adult training vocational programme requirements, on the amendment of the registration, as well as on the deletion from the registration, where three adult training programme experts are delegated by the Chamber, one member by the National Chamber of Agriculture, and one member by the Minister corresponding to the trade group in the NVQR of the VER proposal, and being responsible for the majority of qualifications in the trade group (the members of the committee delegated by the Chamber and the National Chamber of Agriculture and the President are assigned and released by the Minister),
- register adult training vocational programme requirements for other vocational trainings<sup>9</sup> (type B programmes) by involving the National Chamber of Agriculture, and exercises the related titles,
- link adult training vocational programme requirements to the trade groups according to the NVQR in the procedure for the registration of adult training vocational programme requirements, as well as determine and link the vocational programme requirements according to the levels of the Hungarian Qualifications Framework related to the European Qualifications Framework,
- provide for the tasks related to the authorisation of adult training programme expert activity,
- provide an electronic registration of persons entitled to carry out adult training programme expert activity, holding a permit,
- participate through the adult training programme experts in the control of adult training institutions (e.g. observing legal regulations, meeting data supply requirements, revealing adult training activity carried out illegally, i.e. without a permit), as it is set forth by the law that the authority shall carry out its control activity by involving adult training experts and adult training programme experts, in the case of trainings included in the NVQR in cooperation with the relevant authority, with the regional chamber being competent according to the place of practical training participating in the control procedure for the practical part of the training, as similarly to the professional and agricultural chambers operated in the sector, it is mainly the Chamber that can properly evaluate the professional contents of the concerned trainings. In addition to the above, the Chamber shall be also responsible for the revision of accredited programmes, with the request that it should also revise other vocational training programmes until 31 March 2014, included in the register of accredited adult training programmes on 31 August 2013.

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<sup>9</sup> A training aiming at obtaining a non-state recognised vocational qualification (excluded from NVQR), which is not an authority regulated training.

While the vocational examination requirements (VERs) of NVQR qualifications are issued by the Minister responsible for the concerned qualification, vocational programme requirements (VPRs) are approved and included in the register by the HCCI Programme Committee<sup>10</sup>. The aim of vocational programme requirement is to ensure other vocational trainings outside the NVQR to be implemented according to a unified system of requirements as well.

In order to provide for its tasks related to adult training activity, HCCI is financed from the state budget of the training fund part of the National Employment Fund<sup>11</sup> based on an agreement concluded with NOVETAL.

In addition to the above, the following organisations also play a role:

- The **National Qualification Committee (NQC)**<sup>12</sup> is a body to make professional proposals and opinions for the continuous development and modernization of the content structure of VET.
- The **National Economic and Social Council of Hungary**<sup>13</sup> is the widest-ranging forum of representatives of Hungarian society; it holds consultations, delivers opinions, makes proposals, discusses national strategies and cross-sectoral issues affecting the development of the economy and society.
- **County Committee for Development and Training**, which makes proposals for decisions on the professional structure by academic years and counties (also for adult training outside the school system).<sup>14</sup>

**National Vocational and Adult Training Council (NVATC)**, which is a national body to prepare decisions, to make proposals, and to give opinions in the professional field. The list of NVATC members is available on the website of the Ministry for National Economy.<sup>15</sup>

### 3.2. Qualifications Databases

The operation of databases belongs to the scope of two Ministries in Hungary. The Educational Authority, background institution of the Ministry of Human Capacities, operates the Higher Education Information System and the General Education Information System. The data related

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<sup>10</sup> The list of members of the HCCI Programme Committee is available on the HCCI website:

<http://www.mkik.hu/hu/magyar-kereskedelmi-es-iparkamara/program-bizottsag-osszetetele-10964>

<sup>11</sup> Legal regulation: no. 16/2016. (V. 27.) NGM Decree of the Minister for National Economy on the detailed rules of supports grantable from the training fund part of National Employment Fund for certain VET and adult training purposes.

<sup>12</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=457](https://www.nive.hu/index.php?option=com_content&view=article&id=457)

<sup>13</sup> <http://www.ngtt.hu>

<sup>14</sup> The proposals made for supportable qualifications obtainable in a training provided outside the school system based on the Adult Training Act are available on the website of NOVETAL for a period of one year starting from 1 June 2016: <http://www.nive.hu/mfkb2016/index.php?DO=59&tip=>

<sup>15</sup> <http://ngmszakmaiterulek.kormany.hu/download/f/1f/a0000/NSZFT%20tagok.pdf>

to VET and adult learning belong to NOVETAL, background institution of the Ministry for National Economy.

### **Higher Education Information System**

Since 2006, based on the Act on Higher Education (previously Act 139 of 2005, and presently Act 204 of 2011) there is a higher information education system collecting data on higher education. Higher Education Information System consists of an institutional database and a personal database. The institutional database is a public register for higher education programmes and institutions, containing all necessary information on higher education qualifications that are required by the EQF platform.

Its two main sub-systems are:

- higher education institutional register, including the data in the deed of foundation and operating permit of higher education institutions,
- higher education personal register, including the data of students and employees in higher education.

### **Data on vocational and adult education and training**

The National Office of Vocational Education and Training and Adult Learning, NOVETAL collects information on vocational and adult education and training; data and information are published on NOVETAL's website:

- Examination reporting: before the start of complex examinations, it collects the data on the training, the number of examinees, and the place of examination.
- Record of registry sheets: after the end of examinations, it collects data on the training, the examination, and the examinees (success, statistical data, clauses, places).
- Record of examinations: statistical data collected on modular examinations.

The record of vocational programme requirements of adult training is maintained by HCCI.<sup>16</sup> It is of no importance which training provider originally submitted the VPR proposal, after its acceptance the document becomes public and commonly owned and anyone wishing to start the concerned training has to comply with the requirements of the VPR. HCCI is also responsible for the record of adult training providers holding an official permit.

In addition to the above, the role of the Hungarian Central Statistical Office (HCSO) and the system of the National Statistical Data Collection Programme should be mentioned.

Based on Section 21 (4), the adult training institutions shall supply data for statistical purposes according to the National Statistical Data Collection Programme. A part of this programme,

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<sup>16</sup> <http://szpk.mkik.hu/frontend/index.php?module=programkovetelmeny&sub=modul&mid=13>

OSAP1665 collects statistical data on the training and training participants after the end of training. Data collection happens in a yearly cycle; data collection of the previous year is closed every year. The OSAP 1665 data supply is obligatory for not only adult training institutions subjected to the adult training act: all training institutions shall supply data to the National Statistical Data Collection Programme on their implemented trainings. Data supply is for statistical purposes, its reason is on the one hand that statistical data supply based on the previous adult training act should be continued for the continuous use of data, on the other hand that the linking of the data supply system to the statistical data supply systems of the EU should be provided.

Data supply happens through the online system operated by the NOVETAL.<sup>17</sup>

Online data supply has to be provided within 10 days from the examination following the training or from the end of the training. In the case of authority regulated trainings and trainings with a training time of less than 25 hours, data for the adult training institution, the implemented training, and training participants have to be reported within 10 days following the end of the concerned year. The order of data supply for 2014 changed compared to the previous years as contrary to the group data supply until that time; from 2014, regarding the training, participants' personal data have to be provided in the data supply. Online data query is available.<sup>18</sup>

### 3.3. Governance and management of qualifications framework

The Hungarian Qualifications Framework development belongs to two ministries and their background institutions: Ministry of Human Capacities is responsible for general and higher education (its background institution is the Educational Authority (EA) and the Ministry for National Economy (its background institution is the National Office for Vocational Education and Training and Adult Learning (NOVETAL) together with the Hungarian Chamber of Commerce and Industry (HCCI).

**Educational Authority** operates as a governmental agency, under the control of the Minister of Human Capacities. It performs organisation and coordination of surveying, measuring, evaluation and quality assurance tasks regarding all levels of education excluding VET and adult training. As a national authority it can conduct proceedings for infringement of regulations and also may impose fine. The task of developing and implementing the National Qualifications Framework has been delegated to the Educational Authority; therefore, the EQF National Coordination Point is located here. As mentioned in other sections, the responsibility for general and higher education register is in the Authority, too.

So far, four government decisions dealt with the establishment of the Hungarian Qualifications Framework:

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<sup>17</sup> <https://osap.nive.hu>

<sup>18</sup> <https://statisztika.nive.hu/>



- Government Decision no. 2069/2008. (VI. 6.)
- Government Decision no. 1004/2011. (I.14.)
- Government Decision no. 1229/2012. (VII. 6.)
- Government Decision no. 1791/2013. (XI. 7.)

These measures gave instructions on the establishment of the Interministerial Task Force, involving all relevant ministries, sectoral bodies, councils and many other stakeholders, the tasks related to the introduction of the HuQF, launch of the SROP projects, the establishment and introduction of the HuQF as well as accepted the principles of the qualifications framework and assigned the decision makers responsible for the process. There is an intention to further operate this Task Force in case new linking results or process are to be introduced.

The first phase of the development and the projects are over (see detailed description in the Referencing and Self-certification Report of the Hungarian Qualifications Framework to the EQF and to the QF-EHEA<sup>19</sup>), having linked most formal qualifications. The two ministries (Ministry of Human Capacities and the Ministry for National Economy) still have shared responsibility related to the linking, but there is no one single process related to the maintenance of the framework: the quality assurance of both the framework and the linking process are the responsibility of the relevant sector. Linking GE and HE qualifications belong to the Ministry of Human Capacities, while linking VET qualifications is the responsibility of the Ministry for National Economy. The type “B” adult training courses are to be linked by the Hungarian Chamber of Commerce and Industry.

There are three registers operating “behind the HuQF”:

1. one for the vocational education and training (NVQR),
2. one for adult training,
3. and one for the higher education.

Ministry for National Economy is responsible for issuing the NVQR (the last one, including HuQF levels, entered in force from 4 March 2016, downloadable online<sup>20</sup>). HCCI is responsible for the adult training register, including qualifications type A, certificates type B, C and D.

Ministry of Human Capacities is responsible for the register of qualifications obtainable in higher education (including higher vocational education, Bachelor, Master and PhD programmes).

The list of HE qualifications in force from 2017 is downloadable online.<sup>21</sup>

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<sup>19</sup> [http://www.oktatas.hu/pub\\_bin/dload/kepesitesek/referencing\\_report\\_HuQF\\_EQF.pdf](http://www.oktatas.hu/pub_bin/dload/kepesitesek/referencing_report_HuQF_EQF.pdf)

<sup>20</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=297](https://www.nive.hu/index.php?option=com_content&view=article&id=297)

<sup>21</sup> [http://net.jogtar.hu/jr/gen/hjegy\\_doc.cgi?docid=A1500139.KOR](http://net.jogtar.hu/jr/gen/hjegy_doc.cgi?docid=A1500139.KOR)

### 3.4. Training providers

According to the conceptual separation stipulated at a legal level, **adult education** is an educational and training activity provided within the school system, whereas **adult training** is one happening outside it. A distinction should be made between **training service and training activity** as well. The forms of **adult training activity-related service** as defined by the Act of 2011 are in particular: assessment of prior learning, consultation on career orientation and career guidance, surveying training needs and consultation on training, as well as consultation on employment and teaching job searching techniques. According to the law, **adult training-related service** is a service to promote tailoring trainings to individual needs, to improve training efficiency, or to help employment. Within **adult training activity**, 4 training types are distinguished by the law, as well as the name adult training institution is related only to organisations subjected to the law, and holding a permit. Training providers holding a permit are named as adult training institutions by the law. It is not obvious how all other participants should be named. Therefore, fine-tuning of the terminology also for use in public discourse is definitely a current task.

There may be **several types of institutions** carrying out non-formal sectoral trainings, both under and out of the effect of the legal regulations: vocational centres and state-owned schools involved in trainings leading to NVQR qualifications both in and out of the school system; higher education institutions; private trainers providing NVQR qualifications out of the school system; state-owned companies offering (private) in-company qualifications (e.g. the Hungarian Post); state-owned training providers offering private trainings; private companies offering in-company trainings, either leading to documented, internationally accepted qualification or non-documented company-specific paper; and private trainers providing private (market) qualifications.

NOVETAL organized **vocational centres** at the county level as well as in the capital. This governance model should provide greater autonomy at the regional level to ensure participation. The centres provide space and infrastructure for adult learning and VET for adults (CVET, continuing vocational education and training), contributing to the policy aim to extend participation in lifelong learning in Hungary. In the 2016/17 school year, vocational secondary schools providing a Secondary School Leaving Certificate (like the general upper secondary schools) are to be modified into vocational grammar schools. In these new types of institutions, VET students will obtain the Certificate of Secondary School Leaving Examination (maturity exam), and beyond that, with one extra year of schooling, a VET Technician Qualification as well. The present VET schools were modified into vocational secondary schools. These students will have the possibility, having completed their three-year VET studies, to continue their studies for an extra two years in general subjects and pass the Secondary School Leaving Examination.

**Higher education institutions** are eligible to provide non-formal training, but in this case they have to come under the regulation of the adult training act and fulfil the requirements. A part of higher education institutions (summarizing analyses or statistical data are not available) also organise so called paid courses, which prepare participants for either the entrance examination,

i.e. for the own training of the institution or they make certain elements of formal training available for those who cannot or would not like to complete the whole training. In the latter case certificates, certifying documents are issued in many times, which can be included in the non-formal category within the NQF-IN project. Their market values can vary individually although in a competence portfolio, a professional CV they may have high value, or the series of courses can constitute a complete set of knowledge.

According to the legal change in 2013, accreditation is replaced by authorisation, and professional responsibility is taken by the organiser of the training. While earlier accreditation was *institution*-based (institutional accreditation was a criterion for using support sources), now the required official permit is training *programme*-based (i.e. not only the institutions but also the training programmes to be started have to be authorised).

At the end of June 2016 the register of the authority included 1474 institutions holding an official licence, which is approximately identical to the number of institutions having accreditation in August 2013. The **adult training institutional system** remained unchanged, and according to the register of authorised adult training institutions and National Statistical Data Collection Programme data, the most companies being present in the adult training market (70%) are still profit-oriented. The ratio of budget institutions was decreased to 10% as a result of establishing vocational centres, at the same time, their adult training volume increased. Non-profit organisations still represent approximately 20%.

In the **training sector outside the school system** the state is present to a considerable extent. Türr István Training and Research Institute alone, based on the information from the website of the Institute, organises about 5000 trainings for more than 80 thousand participants.

**In-company trainings** can be considered a closed training segment. Depending on whether the courses are provided by the own permanent employees, managers or adult trainers of the company, or they are “purchased” by the company as external service, these are called external or internal training.

In the **adult training market** outside the regulation, in free market training, training as a service is not considered otherwise than any other service. It is difficult to classify market-based adult trainers: some of them especially provide trainings, others start providing trainings for selling a product. Based on the information collected so far, it is not clear yet how the operators of closed training markets (e.g. in-company internal trainings) are interested in the standardized documentation of their activities, and in linking the certificates issued by them to the qualifications framework.

Training programmes are distinguished by international special literature, Hungarian regulation, and the data collection system slightly differently, however, in most cases according to the aim and content of training, as well as the status of the training organisation. Differences are shown by the following table.

**Table 2.** Typology of qualifications according to types of institutes and ownership

|   | <b>State-owned institution</b>  | <b>Private institution</b>  |
|---|---|---|
| <b>State-owned Qualification /certificate</b>     | <ul style="list-style-type: none"> <li>• NVQR qualifications (out of the school system) in vocational centres or other state-owned vocational schools</li> <li>• Type B qualifications in vocational centres or other state-owned vocational schools</li> <li>• Authority regulated trainings</li> <li>• Compulsory in-service training systems determined by legal regulation by sectors, e.g. health care worker, accountant, teacher trainings.</li> </ul> | <ul style="list-style-type: none"> <li>• NVQR qualifications (out of the school system) in private schools</li> <li>• Type B qualifications in vocational centres or other state-owned vocational schools</li> </ul>  |
| <b>Not-state-owned Qualification /certificate</b> | <ul style="list-style-type: none"> <li>• Qualification accredited by an international organization at a state-supported organization (e.g. LEN accredited waterpolo coach training at the Hungarian Swimming Association)</li> <li>• In-company trainings developed by a state-owned institution (e.g. Hungarian Post)</li> </ul>   | <ul style="list-style-type: none"> <li>• Qualification accredited by an international organization at a private training institution (e.g. a fitness qualification accredited by the European Health and Fitness Association)</li> <li>• Further trainings developed by a Hungarian private trainer (e.g. sport nutritionist, spine concept)</li> <li>• International qualifications (or those which have an ownership abroad and one private institution obtains monopoly to carry out trainings) – e.g. in sport: Microsoft, Cisco, Oracle industrial standards, TRX, kangoo etc.</li> <li>• qualification accepted, owned, issued or licensed by a private organisation (e.g. consultant or project manager training,)</li> <li>• qualification accepted, owned, issued or licensed by an international organisation (e.g. international sport association)</li> </ul> |

## 4. Types and legal status of qualifications included in the NQF

Due to the present development phase of the system of Hungarian Qualifications Framework, a part of the questions in this chapter can be only answered conditionally, and regarding the procedure, experts' recommendations, as well as open questions, dilemmas requiring consideration and decision can be worded.

Due to the characteristics of the Hungarian system, even the expression “included” itself has to be made more precise as the interpretation is closely related to the issue of the registration and development of the framework at a national level.

Presently the independent, publicly available NQF meta-database is still under development (it is expected to operate by 2017). By mapping the sectoral management of the Hungarian education and training information system, there are 3 registers “behind” the HuQF (see more in sub-chapter 3.2.3). Presently there is no steering body assigned to provide the continuous development of HuQF, bearing full responsibility. So far the assigned organisational unit of Educational Authority was responsible for coordinating the developments related to the framework.

There is no legal regulation to define the group and nature of qualifications and certifying documents that can be linked. At the same time, there is no effective regulation, either, to limit qualifications and certifying documents that can be linked.

The status and type of the documents certifying the obtainable competence are determined by the state and type of training. Without understanding the training programme types, the options and problems of integration into the framework are hardly understandable. Therefore, we prepared an overview table for a better understanding of the types of the Hungarian qualifications affected by the linking. This explains which competence development trainings are available in the adult training sector.

### 4.1. Types of qualifications

The key categories to create the types are the following (see Figure 1).

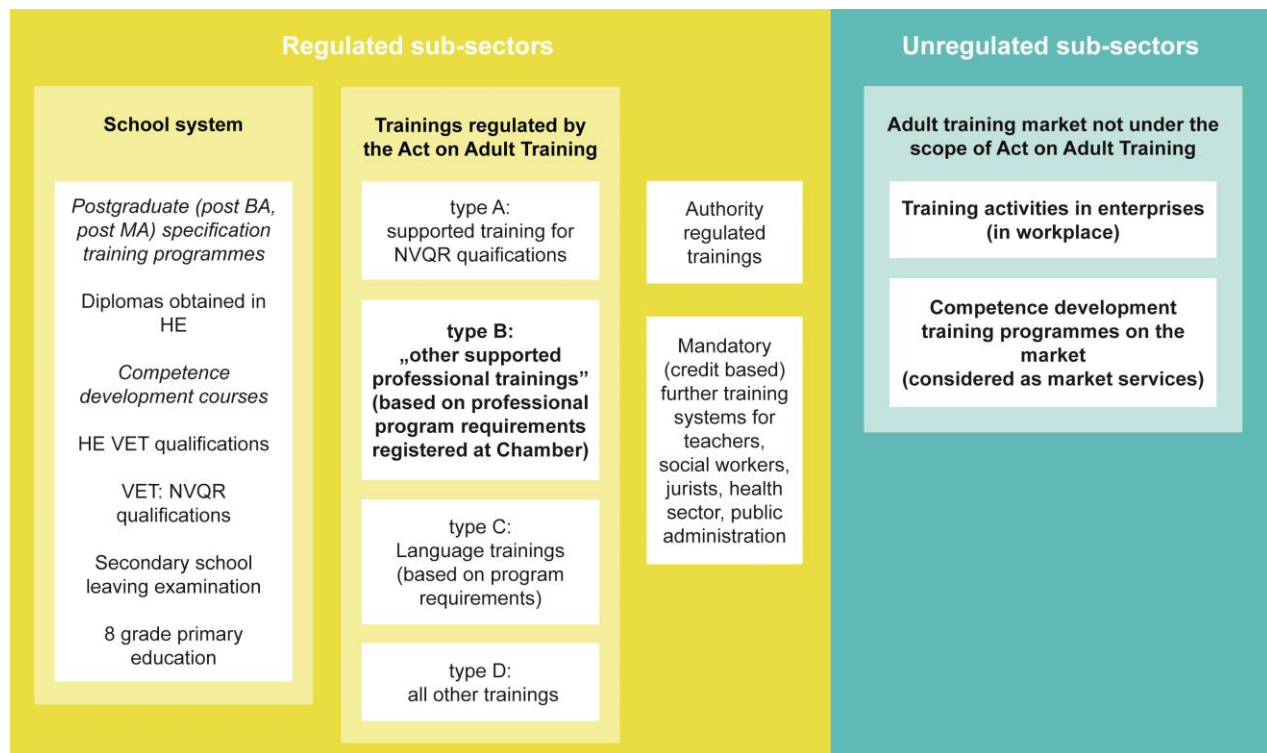
1. **Special training forms determined by legal regulation for the training** (the regulation has various nature and source)

- Education and training within the school system (regulated in the laws by sectors, general education, VET within the school system, higher education). The forms of the issuable certificates (school certificates ualification, degree) are also regulated by the laws. A part of higher education institutions organise courses that do not lead to a degree, and can be included among non-formal qualifications.

- Certain activities regulated by the Adult Training Act. The law lists 4 training forms. Type A training aims at obtaining a qualification that can be also obtained in VET within the school system, is state recognised, and included in the NVQR. Type B qualifications are non-state recognised, not included in the NVQR, and can be identified as non-formal programmes, whose vocational programme requirements are authorised by the Chamber within the frame of a special procedure, and based on this, at the end of the training a certifying document is issued. Type C foreign language trainings, which can be also provided based on authorised language programme requirements (LPRs). The so called type D “other trainings”, which are not vocational but e.g. catch-up or competence development authorised trainings (no programme requirements belong to them).
- 1/a. Authority regulated and compulsory in-service training systems of particular professions belong to the activities that are **regulated but not subjected to the Adult Training Act**.
- The so called authority regulated trainings mean a separate group (these fall within the competence of various ministries, and are regulated separately, by the legal regulations issued by the competent ministry).
- The compulsory in-service training systems of certain professions, which oblige the participants to collect a given number of credits or points, obtainable through the participation in recommended programmes, in periods of 4-5-7 years. The compulsory in-service training system of teachers, as well as the compulsory in-service training for civil servants, health employees, legal experts and accountants mean such separated systems as well (in every case a separate legal regulation arranges for registration, the group of institutions to participate in the training, and the programmes).

2. **Non-regulated adult trainings** operating as a so called “free market” service, which usually include non-supported workplace trainings, or – in a more restricted definition – in-company trainings.

**Figure 1.** Education and training system and the sub-sectors of adult training



(In Figure 1 in the box about School system non-formal trainings are written in italic. Institutions belonging to the school system also provide non-formal training programs. Higher Education Institutions organize competence development courses without state-recognized certificate. Such trainings, e.g. for companies, may be organized also by vocational training providers.)

Hungary presently does not have an established, regulated, procedure for linking formal qualifications and documents (certificates) obtainable in the non-formal sector to the HuQF. Development work so far mainly happened within the frame of sectoral projects (SROPs) co-financed by the European Social Fund. Linking formal qualifications was done by experts working in the projects.

Linking so far aimed at the completed levels of education and qualifications obtainable in the training provided within the school system. Presently, the experts in the field focus on the methodology of linking, and the related issues. The most important obstacle that emerged during the development of the framework was that the existing qualifications were not described in the form of learning outcomes. The most energy has been invested so far in rewording the texts of qualifications, and making this approach considered new in the Hungarian training system understandable and applicable for all stakeholders. Within the frame of the development projects so called test-linking happened, which raised several problems and questions regarding the quality and coherence of the descriptions of the qualifications.

In linking carried out within the development projects, three methodological steps followed one another. First, the internal hierarchy of the typical outcomes of each sector (general education, VET, higher education) was compared to the 8 levels of the Qualifications Framework, and preliminary levels were identified for certain qualification groups. Following this, each qualification was linked according to the principles and methodological guidelines established for the sector in the concerned development project. Where contentual differences and/or other practical aspects emerged, linking was corrected accordingly.

In the general education sector, where there are only a few types of training outcomes<sup>22</sup>, linking was carried out in a TÁMOP development project (SROP 3.1.8) by assigned experts. The certificate received at the end of the compulsory 8-grade primary school cannot be actually considered a “qualification” as it gives the foundation for further studies (in other words it prepares, “qualifies” for further school studies).

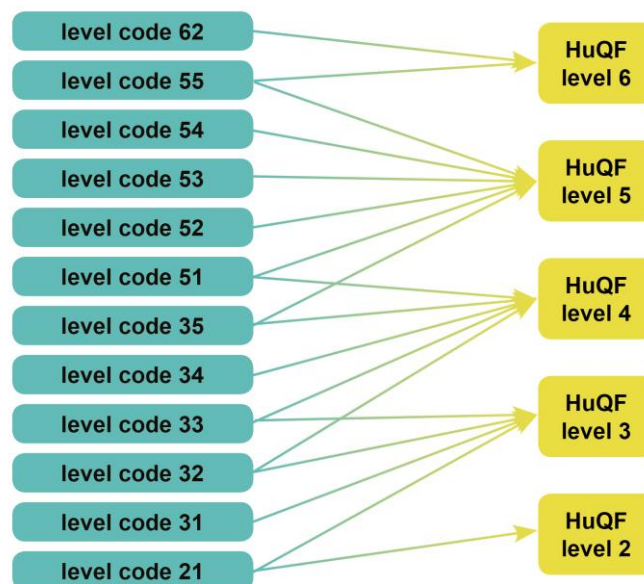
In VET the qualifications included in the national register (NVQR) are linked (641 pieces), linking was done by assigned experts in the SROP 2.2.1. project. NVQR has an internal levelling, with levels from 21 to 62, identified by (not continuous) numbers, being also different regarding the training input requirements (e.g. the required level of educational attainment or the required qualification). The lowest level is level 21, which provides a primary level partial qualification, and it does not require a completed school attainment. The highest level is level 62, it requires higher education qualification (completed degree program) as an input criterion. In linking, in order to harmonise the work of experts, first test-linking was done, then based on this, a methodological guide indicated the possible/probable/recommended HuQF levels (e.g. level 21 of the NVQR to level 2 of the HuQF, levels 31-33 of the NVQR to level 3 of the HuQF, level 34 of the NVQR to level 4 of the HuQF, etc.). There were qualification levels where the preliminary proposal included two possible (optional) HuQF levels. In other words, it can be stated that before linking each VET qualification, the preliminary linking of an independent hierarchic sub-system was carried out. This linking is shown by Figure 2.

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<sup>22</sup> In the Hungarian system not only qualifications but some outcomes of formal training provided within the school system were also linked to the Framework. The certificate of completing grade 8 and the secondary school leaving examination shall be considered as real outcomes (though these are not qualifications either). They entitle their holders to continue their studies at a higher school level. At the same time, there are trades in which studies can be started without completing primary general education as well, or where it is enough to certify the completed secondary school grades, i.e. certificate of secondary school leaving examination is not required. Completing 6 grades of the primary school practically does not mean an actually full, certified outcome.



**Figure 2.** The relationship between NVQR and HuQF



For the higher education sector, already at the time of creating the HuQF levels, an agreement was made that the various higher education qualifications will be linked to the HuQF at certain levels (5,6,7,8). This means certain automatisms were used here as well: higher VET (which does not give a higher education degree) is linked to level 5, the Bachelor programme to level 6, the Master programme to level 7, whereas the doctoral programmes to level 8. Following this, again in a development project (SROP 4.1.3) so called “intermediary” levels (i.e. levels between the HuQF level and the concrete qualifications) in the special fields (a “special field framework” similar to the sectoral one) were created by the experts, teachers working in higher education (e.g. broken down by and specified for the technical, legal, agricultural special fields, etc.). Following this, the responsible ministry gave the task to HE actors to reword the educational and outcome requirements (EOR) of the higher education programmes into the form of learning outcomes. This allowed analysing actual correspondence to a level; however, it did not affect the already given level of linking.

This means that linking of the certificates obtainable within the school system does not have yet a separate order of procedure (that is independent of the projects, permanent, institutionalised, and sustainable) in addition to the above. The regulation and governmental separation of the three sectors (general education, VET, HE) remained in this field as well.

Linking of the VPRs of the so-called type B trainings classified as non-formal type (that are non-state recognised but subjected to the Adult Training Act) is required by a legal regulation; however, this task has to be carried out subsequently by the assigned organisation, HCCI. (According to the order of procedure, linking of the VPRs of type “B” trainings shall be the task of the training provider organisation that submitted them and requested registration; however, in the first round, as at that time no unified methodology elaborated in detail was available, the above requirement was removed from the expectations. The job of linking professional program

requirements was launched by HCCI in November 2016. Experts found 19 PPRs problematic from the registered and online available 154 trainings; comments were made mostly regarding the gaps in learning outcomes descriptions. In the second round, other experts were also involved and 13 qualifications descriptions have been approved. The professional decision making committee refused the descriptions in 6 cases; these descriptions had to be revised and re-submitted by the submitting institutions in cooperation with the reviewing experts. This round of correction was originally not part of the procedure; however, this form of mutual learning proved to be necessary in practice. The original rules of procedure envisaged a correction round only for formal shortcomings, see Chapter 5 under point 8. The professional decision making committee is making a decision on the 6 refused cases at the end of January 2017. After this, the institutions submitting the PPRs have to make a proposal on the EQF/HuQF level on their own.)

The table below lists the qualifications and certifying documents that have been linked and have not been linked yet to the HuQF. The first column of the table names the qualifications (with the original Hungarian names in brackets). The middle column indicates which level the concerned certifying document has been linked to so far. The sometimes detailed remarks in the third column indicate the special conditions related to the concerned qualification, and they include additional information on the issues that emerged related to the linking.

**Table 2.** Training outcomes that have been and have not been linked to the HuQF

| <b>QUALIFICATIONS AND SCHOOL OUTCOMES THAT HAVE BEEN LINKED</b>                         |   |   |
|---|---|---|
| <b><i>School type education</i></b>   | <b><i>HuQF level of linking</i></b>   | <b><i>Remarks, questions</i></b>  |
| Not completed general education (6 classes)   | 1   | This is not a real outcome (certified by a certificate) but allows entering 6-grade secondary grammar school.   |
| Completed (8 grade) primary general education (Primary school leaving certificates)     | 2   | It gives a certificate required for entering secondary school, and it is an entrance criterion for learning certain trades.   |
| Bridge I and II programme (Partial VET qualification after Vocational Bridge Programme) | 2   | Special catch-up programme preparing for further studies students who did not get into secondary level education.   |
| Leaving certificates of skills developing special vocational schools                    | 2   |   |
| Leaving certificates and VET qualifications of special vocational schools               | 3   |   |
| Secondary school leaving certificates   | 4   | Secondary school leaving certificate is a proof of accomplishment of secondary education and it is required to take a secondary school leaving examination.   |
| Certificate of secondary school leaving examinations                                    | 4   | Certificate of secondary school leaving examination is partly a prerequisite for entering the tertiary education and for some VET qualifications.   |
| <b><i>VET qualifications</i></b>  |   |   |
| Vocational qualifications listed in the NVQR  | 3, 4, 5, 6  | 641 vocational qualifications listed in the NVQR  |
| Partial qualifications  | 2,3,4   | It qualifies its holder for filling at least one scope of work.   |
| Add-on qualifications   | 3,4,5   | Special expertise to supplement an already existing qualification. (E.g. Lumberer – Urban lumberer).  |
| Type B professional non-formal certificates (under the scope of Adult Training Act)     | Any level excluding 1 and 8 depending on the entry requirements and learning outcomes | So-called “other vocational trainings” or those registered by the Hungarian Chamber of Commerce and Industry (HCCI), whose vocational programme requirements (VPRs) have to be accepted in a special procedure. |

| <i>Qualifications issued in HE</i>   |   |   |
|--|---|---|
| HE VET qualification   | 5                                       | Higher education short cycle training programmes that give higher vocational qualification but do not give higher education degree.<br>Despite its name it is not considered as a higher education degree but it can be recognised with the determined number of credit points when entering higher education in the same specialisation.   |
| BA, BSc  | 6                                       |   |
| MA, MSc  | 7                                       |   |
| PhD  | 8                                       |   |
| Postgraduate specialization training certificates (in HE)  | 6, 7                                    | These 2- or 4-year-long programmes that can be chosen after the BA/BSc or MA/MSc programme do not give a higher level degree. They are practice-oriented specialising trainings, which deepen or broaden the professional knowledge certified by the BA/BSc degree, and they may be the criteria for another job in a workplace. Higher education institutions decide on postgraduate specialization trainings in their own power. (E.g. Lawyer specialized in environment protection, or Drama Teacher)                            |
| <b>NON-FORMAL QUALIFICATIONS, CERTIFICATES OR CERTIFICATE OF PARTICIPATION THAT HAVE NOT BEEN LINKED</b> |   |   |
| Master craftsman title issued by Hungarian Chamber of Commerce and Industry                              | This is not a qualification but a title | Those already having a qualification can take a master craftsman examination after several years of professional practice, which is organised by HCCI and HCA. Preparation for the examinations is possible individually or in courses. Those who have taken a successful examination can use the title of a master (master joiner, master hairdresser, etc.). The above title certifies professional expertise to the customer and the authorities. Master craftsmen title is not regarded as (but based on) a NVQR qualification. |
| Qualifications of authority regulated trainings  |   | These programmes are not legally subjected to the Adult Training Act, and they are not included in the NVQR. However, in practice there are some qualifications that cannot be obviously classified.  |

|   |                               |   |
|---|-------------------------------|---|
| Type C language training certificate  |                               | The programme requirements <sup>23</sup> of language trainings are described in separate documents.<br>As these certify a single competence, their linking to the complex requirements of the qualifications framework would arise several questions. |
| Type D „other” training programmes’ (under the scope of Adult Training Law) - certificates of participation |                               | In this category there are no elaborated programme requirements   |
| Sector/Company certificates accepted internationally (Oracle, Cisco, Microsoft)                             |                               | It is not identical to the international qualifications as the issued certifying documents are owned by one company.  |
| Other certifying documents issued on the free training market   |                               | Although there are legal regulations for possible names of the papers, practically various names are used (degree, diploma, certificate).   |
| Sectoral, international certificates (ECDL certificates)  | 3 certificates on one another | Despite the fact that this includes a single competence field, several countries linked (after agreement) the different certification levels.   |

The terms qualification and certificate (and their Hungarian translations) do not seem to be sufficiently precise for the adequate naming of the certifying documents.

Despite the fact that legal regulations arrange for the names and types of the issuable certifying documents<sup>24</sup>, the use in Hungary cannot be considered mature.

According to legal regulation, degree as an official document can only be issued by a higher education institution, after the examinee has successfully taken the required exams. A “certificate” (bizonyítvány) can be issued in general education, after the completion of primary and secondary level education, whereas VET institutions can issue qualifications. NVQR qualifications can also be obtained in a course outside the school system (based on a successful written and practical examination). In the case of courses, different trainings outside the NVQR, “only” a certificate can be issued (except the authority regulated qualifications)<sup>25</sup>.

<sup>23</sup> [https://www.nive.hu/index.php?option=com\\_content&view=article&id=538](https://www.nive.hu/index.php?option=com_content&view=article&id=538)

<sup>24</sup> The laws regulating the individual sectors of the training system (Act LXXX of 1993 on higher education /as amended many times/, Act XXIX of 2003 on the amendment of Act LXXXVI of 1993 on VET, Act LXXIX of 1993 on general education as amended by Act LXVIII of 1999, and Act CI of 2001 on adult training) clearly state what closing document can be issued for each training.

<sup>25</sup> Each sub-field is subjected to independent regulation. Pursuant to the no. 16/2014. (IV. 4.) NGM Decree of the Ministry for National Economy on the requirements of registration and rules of procedure for adult training LPRs, and on the certification of meeting the requirements of language training, the criterion for

Presently there is a serious confusion in the training market regarding the names and real status of the issued certificates. Training companies like using impressive names otherwise positively accepted by training participants, which have no legal basis. In most cases the term “degree” and different foreign names such as “certificate” are fashionable.

There are also several problematic elements in the translations from international English language, used in the various documents on this topic (sometimes not only because the translators are not familiar with this topic but due to the fact that the professional terminologies of the target languages are limited, or the features of the concerned system cannot be described by expressions taken over from another language).

Presently there is only one type of non-formal qualification, for the linking of which regulation is in place, and a procedure has been described in detail. The actual linking has been completed by the end of January 2017. The non-formal trainings (outside the school system) regulated by the Adult Training Act, and the qualifications, certifying documents based thereon are of two types.

- The trainings belonging to type A providing state recognised qualifications are identical to the qualifications organised within the school system, and included in the NVQR. The linking of these has already happened in the VET development project (SROP 2.2.1).
- All others as listed by the Act (type B other vocational trainings, type C language trainings, and type D other trainings) can be included in the non-formal type. Presently legal regulation for type B other vocational trainings included in the non-formal vocational trainings, as well as for the training programmes leading to them arranges for their linking to the HuQF by HCCI maintaining their register. The new NVQR 2016 was published in September 2016; after this, the Chamber – in cooperation with experts – started the linking process of 154 professional program requirements. Most of the VPRs (134) have been levelled; the whole process will be finished by the end of January 2017.

Pursuant to Point 6 of Section 2 of the effective Adult Training Act (2013), **other vocational training**: is a training aiming at obtaining a non-state recognised vocational certificate, which aims at acquiring, developing a competence required for filling an occupation, or performing a job or work activity and is **not** an authority regulated training. With reference to the text of the Act, this training form is also called type B training as the texts lists it in point b) out of the four listed training forms, nevertheless, it is also referred to as chamber training as registration is the task of the Hungarian Chamber of Commerce and Industry, or it is also named “small NVQR” as the function of the vocational programme requirements giving a foundation to the trainings is similar to the vocational examination requirements determining the contents of the qualifications included in NVQR. Their function is to establish a unified system of requirements.

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issuing the certifying document is participation in 80% of the training hours and successful examination.

Annex no. 2 includes the unified form used for the description of the programme requirements to be submitted. The description of the programme requirements follows the structure of the HuQF descriptors.

The Hungarian Chamber of Commerce and Industry has prepared a guide<sup>26</sup> that describes in detail the method of writing the programme requirements (basically following the structure of the standard form).

## 4.2. Ownership

Ownership of the training programmes and qualifications raises several questions.

Non-formal training VPRs are submitted by training providers (companies) to the Chamber for approval. The programmes elaborated by them after their acceptance (already without the indication of the submitting organisation, company) are published on the public web surface of HCCI and so the companies lose their owner status for the concerned programme, i.e. the VPRs become “publicly owned”, and other companies have to start their training programmes under the same name according to them. This means the descriptions become texts that can be known and used by anyone the same way as the VERs of state recognised qualifications. However, in the adult training market “it is a dog-eat-dog world out there” as one of our interview subjects said, i.e. the training companies are in sharp competition with one another. If a company develops a new training programme, it may mean temporary market advantages for it; therefore, the company handles the concerned programme as “an industrial secret”. (It considerably hindered us from revealing the situation in the interview that companies did not intend to show the detailed descriptions of their most competitive programmes.) Besides, it is also characteristic that many training companies use NVQR descriptions for compiling their own training programmes and they are not interested to make this public. Customers and employees are interested to use cheap and short trainings, in which a “simplified”, shortened training only aiming at creating certain skills is more advantageous than fully regulated training programmes.

This situation presently acts as a brake on including otherwise competitive programmes in the group of authorised and registered trainings (that are thus also linked to HuQF).

The present regulation of authorising the vocational programme requirements (VPRs), based on the interviews made by us with training companies, prevents the concerned training companies from flexibly establishing their programmes according to the market demands as if programmes are tailored to customers’ needs, it means an amendment that leads to losing the authorised status, or it is considered a new training, which has to undergo the whole authorisation process again. Therefore, several companies do not even try to get the advantages related to the authorisation such as training without VAT, which would also offer market advantages (lower

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<sup>26</sup> The guide in an electronic file format is available on the website of Hungarian Chamber of Commerce and Industry.

[http://www.mkik.hu/upload/mkik/felnottkepzes/programkovetelmeny\\_utmutato\\_vegleges\\_2016\\_01\\_01.pdf](http://www.mkik.hu/upload/mkik/felnottkepzes/programkovetelmeny_utmutato_vegleges_2016_01_01.pdf)

prices). The managers of several training companies said in the interviews that they rather stayed outside the effect of the Adult Training Act, in the so called free training market as they could tailor trainings to customers' needs only this way. In this case a regulation to improve quality (may) conflict the needs of adaptation to the market and flexibility.

### **4.3. Problems of linking non-formal vocational programme requirements**

In summer 2016, with the participation of five experts, we prepared the experimental linking of 13 non-formal programmes, with the particular aim to reveal the typical problems in this field. No programme descriptions were available for the non-regulated adult training market that would have met the profound expectation that the description should be in learning outcomes, and it should follow the structure of the HuQF. Namely, the companies providing non-formal training not regulated by the Adult Training Act do not necessarily prepare a structured programme description, or typically they write a simple thematics, or referring to market interests they do not let anyone have an insight into these „internal” documents. Therefore, we chose type B VPRs that met the above formal requirements. Type B VPRs mean an obligatory framework for the adult training companies if they want to start an authorised training therefore their linking automatically denotes the HuQF level of the training programmes built on them as well.

The project management initiated a discussion with the experts in the chamber responsible for the registration and linking of type B trainings regulated by the Adult Training Act to summarize and share conclusions. The most important statements of the discussion were the following.

Presently descriptions are of a very unbalanced quality. Although from a formal aspect they describe training requirements in learning outcomes, however, in many times the descriptions do not provide enough information for the determination of the adequate HuQF level. For example, they indicate the field of knowledge, but do not include the information for its depth and to identify the context. Sometimes they are too rough, and in the descriptions descriptors are mixed to a great extent, sometimes important competences are missing, or too many competences are described for a very short training.

The presently valid order of procedure (described above) does not allow correcting such problematic elements in the submitted programme requirement, for example correcting the improperly worded learning outcomes as a result of a professional consultation. This would be a more useful solution than rejecting registration or publishing the programmes including a lot of problems. With respect to the importance of this, and considering that the whole HuQF is in the initial phase of introduction, it would be reasonable to amend the order of procedure, and to insert this section to improve quality.

It also emerged in the discussion that the general training political function of type B trainings as regulated non-formal training programmes should be determined. Type B VPRs and training activities regulated by this tool take a kind of intermediary place between state recognised NVQR qualifications and certifying documents obtainable in the free market of adult training.



Their regulation can be also characterized by the features of this intermediary nature (transitory category). VERs used as a regulatory tool in the case of NVQR qualifications were regarded as a sample of regulation. Although type B VPRs describe the outcome characteristics of the training, they do not include uniform expectations for the assessment, which makes the actual quality of the trainings built on the programme requirements intransparent.

The experience gained from the company interviews prepared within the frame of the project also confirms that registered presence in this type of regulated adult training market and undertaking the related administrative burdens (also involving the loss of ownership for the programmes submitted for registration) is not attractive enough for training business enterprises and companies belonging to their clientele. In many cases, in particular among the conditions of the present serious shortage of labour force, employers satisfy their needs for qualified labour force outside the regulated adult training sector, by using their own solutions. This means that they are not interested in linking to the NQF either.

The Hungarian management of ECDL initiated a discussion with the project management as they wanted to use the indication of the HuQF level in the certifying documents issued by them. As there is no elaborated procedure for this, it can be regarded as an individual initiative.

## 5. Procedure of the inclusion of qualifications in the NQF

During the development of the HuQF state recognised formal qualifications were included in the framework within the three ESF projects. The inclusion procedures were different and inherent to the separated projects. So far linking has been organised with an experimental nature, and a uniform and compulsory order of procedure for linking has not been stated yet.

Presently for certain types of adult training, there is a single order of procedure, which is for authorising the VPRs of the non-formal, so called type “B” trainings, and linking of the programmes submitted for authorisation means a part of this; therefore, we describe it in detail. Now this order of procedure may serve as a model to be further developed for the subsequent elaboration of linking procedures.

VPRs of the so called type B (non-state recognised, non-formal) trainings regulated by the Adult Training Act can be authorised and registered in a relevant procedure. Their indication by a HuQF level number (i.e. their linking) is a part of preparing the proposal; therefore, this has to be performed by the person submitting the VPR.

Based on the order of procedure, the given vocational programme requirement (VPR) “automatically” becomes “a part of” the HuQF.

Based on the Adult Training Act (2013) and 3 additional related decrees, Educational and Training Directorate of HCCI shall perform the following:

- preparing the VPR proposal for decision making,
- the tasks related to the operation of the vocational Committee entitled to make decisions (consisting of 5 members<sup>27</sup>, normally holding meetings every 3 weeks) (the members are assigned by the Minister), and
- managing the register of programme requirement.

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<sup>27</sup>In the decision making committee with five members, three adult training programme experts are delegated by the Chamber of Commerce and Industry (HCCI), one member by the Chamber of Agriculture and one member by the Minister corresponding to the trade group in the NVQR of the VPR proposal, and being responsible for the majority of qualifications in the trade group (the members of the Committee delegated by the HCCI and the National Chamber of Agriculture and the President are assigned and released by the Minister).

The order of procedure for the registration of adult training VPRs by HCCI is the following. Flow-chart in Annex 3 shows the authorisation process and related steps. Linking to the HuQF is a part of this process.

### ***1. Submitting the proposal***

The proposal for the registration of adult training VPR can be submitted in the appropriate format by any legal personality, business association not incorporated, individual company, private entrepreneur. The programme requirement proposal can only be submitted in an electronic format on the website of HCCI.

The system sends an automatically generated message on the arrival of the programme requirement proposal to the person making the proposal.

The programme requirement proposal shall include the following:

- a) the name of the VPR and the indication of the trade group in the NVQR which the programme requirement can be linked to, as well as the indication for the determination and linking of the level of the programme requirement according to the Hungarian Qualifications Framework related to the European Qualifications Framework.
- b) depending on the nature of vocational qualification, the input competences required for starting the training, prior school attainment and vocational qualification, requirements of health aptitude test, and the required practice,
- c) a brief description of the most typical activity/field of work that can be performed/filled with the concerned vocational qualification,
- d) depending on the training form, the minimum and maximum number of training hours of the training required for obtaining the vocational qualification,
- e) the description of vocational requirements,
- f) depending on the nature of vocational qualification, the ratio of the theoretical and practical training time
- g) the conditions for issuing the document certifying the obtainment of the vocational qualification.

### ***2. Identification and linking of the VPR proposal***

The VPR proposal is provided with continuous registration numbers by HCCI in the order of arrival. The registration number of the VPR proposal includes seven digits. The first five digits is the continuous registration number of the programme requirement proposal, whereas additional two digits are determined by the two last numbers of the year in which the proposal arrived.

### ***3. Preparation of the decision***

In order to conduct the procedure for the programme requirement proposal, HCCI uses a programme accreditation expert. HCCI sends the programme requirement proposal to the expert within 5 days from the arrival, in an electronic form, for giving an opinion on it. HCCI selects the expert, with the expert's competences taken into account and the sub-special field, trade group determined, and assigns the expert to perform the concerned task.

The expert can decide free on the acceptance of the request for expert activity, with the following taken into consideration:

- the subject of the assignment exceeds the expert's special knowledge at his/her own discretion,
- the expert cannot perform the task at the expectable professional level, also in compliance with the rules of the relevant order of procedure and legal provisions within the specified deadline,
- the expert considers the assignment incompatible for any other reason.

The expert cannot accept the assignment if

- the assignment is related to an adult training provider which employs the expert or with which the expert is in any other work-related legal relationship, or if the expert is the close relative or relative of the adult training provider's employee, or of the adult training provider's worker who is employed in any other work-related legal relationship.

The expert sends the expert opinion prepared with the content as specified by the given annexes to HCCI within 5 days from the request, with each page verified by the expert's signature, in a printed form, as well as electronically. The expert opinion is prepared by the expert with the relevant legal regulations taken into consideration, as well as based on this order of procedure.

Only the programme accreditation experts can be used as experts for evaluating the programme requirement proposal that have a permit according to the no. 10/2010. (IV. 15.) SZMM Decree of the Ministry of Social Affairs and Labour on the rules of adult training expert activity.

### ***4. Making the proposal***

Based on the expert opinion, HCCI prepares a proposal for the next meeting of the Committee, in a table format, including the following:

- data for identifying the person making the proposal, and the programme requirement,
- date of submitting the proposal,
- name of the expert participating in the study,

- information required for making the decision.

HCCI sends the expert statement for the cases indicated in the proposal to the members of the Committee electronically, as a main rule at least 3 work days before the Committee meeting.

### ***5. Making the decision***

The relevant legal regulations put exercising of the decision making power in the scope of activity of the Committee. The Committee makes a decision within 30 days after the arrival of the VPR proposal. The Committee may lengthen the procedural deadline once, for maximum 30 days. The time from the request for completion to the completion is excluded from the procedural deadline.

HCCI notifies the person making the proposal of the decision made at the Committee meeting within 5 days after the decision has been made, in an electronic form, as well as if the Committee has made a supporting decision, it publishes the programme requirement on the website of HCCI.

The VPR submitted by the person making the proposal can be supported if it includes what is stated by Section 18 (4) of the Adult Training Act as follows:

- the programme requirement proposal has been linked to the most typical trade group according to the NVQR,
- the competence acquired during the training has been linked according to a field of work occupation based on the Hungarian Standard Classification of Occupation (HSCO),
- input requirements for starting the training have been determined, and they are in compliance with the description of vocational requirements,
- the competences required for performing the concerned work activity can be acquired with the planned number of training hours, according to the form of training,
- it determines the criteria for issuing the document certifying the successful completion of the training.

#### ***Additional aspects***

- the name of the programme requirement proposal meets the requirements for fair information supply, it is not deceptive, and it is suitable for identifying the activity, field of work that is the most typical based on the competences that can be acquired through the training,
- the name of the programme requirement proposal is in compliance with the description of the most typical work activities that can be performed with the vocational certificate,
- the name of the programme requirement proposal helps the employer identify the fields of work that can be the most typically filled with the vocational certificate,

- the name of the programme requirement proposal informs the employee on the content and utilisation of the competence that can be acquired with the vocational certificate,
- the input competences indicated for starting the training only include the criteria that are minimally required for starting the training to acquire the competence attainable with the vocational certificate,
- the description of the most typical work activities that can be performed with the vocational certificate is unambiguously defined, and the competence that can be acquired with the vocational certificate is required for performing the activity or in the field of work,
- the minimum and maximum number of training hours required for obtaining the concerned vocational certificate providing sufficient time for acquiring the competence required for performing the indicated work activity, and the maximum number of training hours does not exceed the double of the minimum number of training hours,
- with the competences attainable through the vocational qualification, the activity/task in the work field can be performed, or it can be performed at a higher level, the description of VPRs include the vocational knowledge, skills describing the vocational competences required for performing the most typical work activities as well as personal competences, social competences and methodological competences,
- the VPR proposal includes a presentation and justification for the social and economic fields where the planned training is needed,
- the ratio of the theoretical and practical training time is adjusted to the nature of the vocational qualification, and it meets the time requirement for acquiring the competence related to the vocational certificate, stated by the training form,
- as two criteria for issuing the document certifying the obtainment of the vocational qualification, participation in seventy percent of the number of training hours stated for the training in the adult training agreement, and the successful completion of the final vocational report (hereinafter referred to as: the report) organised by the adult training institution were identified,
- if the proposal has a modular structure, it includes the minimum and maximum number of training hours, the description of vocational requirements, and the ratio of theoretical and practical training time by modules.

## ***6. Completion, rejection***

If the Committee states that the proposal prepared for decision does not comply with the criteria set forth by legal regulation, the person making the proposal is requested to correct deficiencies within a deadline of 10 days.

The Committee rejects the registration of the proposal by specifying the reason if the person making the proposal does not provide the requested data within the specified deadline or the submitted completion is not appropriate, furthermore, the proposal cannot be registered due to the legal regulation.

The VPR proposed by the person is rejected if

- the proposed VPR is considered as an authority regulated training regulated by other legal regulations,
- the proposed VPR is considered a state recognised NVQR training, or higher vocational education and training,
- the name of the submitted VPR proposal is identical or confusingly similar to the VPR included in the registration,
- any of its modules can be found in the government decree on the vocational requirements module of state recognised qualifications,
- in the case of an NVQR qualification, more than forty percent of the vocational competences, in the case of a partial qualification more than sixty percent of the vocational competences can be found in the VPR proposal,
- except for the case when the vocational competence in the proposal is aimed at acquiring the vocational competence of the qualification in the NVQR at a higher level, or at establishing special vocational knowledge and vocational skills (R. Section 2 (5) d))
- more than forty percent of the vocational competences in the higher VET and outcome requirements according to the National Higher Education Act can be found in the VPR proposal (R. Section 2 (5) e)
- more than forty percent of the vocational competences in the competence modules of the master craftsman trainings of HCCI and National Chamber of Agriculture can be found in the programme requirement proposal<sup>28</sup>

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<sup>28</sup> Regulation of HCCI master craftsman trainings: no. 8/2013. (III.6.) NGM Decree of the Ministry for National Economy; no. 47/2014. (X.29) EMMI Decree of the Ministry of Human Capacities; no. 31/1996. (VI.19.) IKM Decree of the Ministry of Industry and Commerce; no. 27/1996. (X.4.) FM Decree of the Ministry of Agriculture; no. 53/2013. (IX.11.) BM Decree of the Ministry of Interior; no. 21/1997. (VI.4.) MKM-IKIM Decree of the Ministry of Culture and Education-Ministry of Industry, Trade and Tourism. Regulation of National Chamber of Agriculture master craftsman trainings: no. 27/1996. (X.4.) FM Decree of the Ministry of Agriculture; (R. Section 2 (5) f))

- the person making the proposal gives no reaction to the Committee's notification for completion within the given deadline, or the Committee does not accept the requested data.

### ***7. Amendment and revision of the programme requirement***

The Committee amends the VPR if

- the amendment proposal aims at Points *c)-d) and f)* of Section 18 (4) of the Adult Training Act (i.e. at the scope of work that can be filled, the number of training hours, or the ratio of practical training) and it is in compliance with the provisions according to Section 2 (1) of the Implementing Decree, without changing the contents of the existing modules, or
- due to a change in the legal regulation, the indication of the trade group according to the NVQR in the ID number of the VPR is changed.
- with the use of an adult training programme expert, the Committee revises the VPRs included in the register until 30 November every year, and within 10 days after the revision
- it changes the register in the case as stated by Point *b)* of Section 3 (1) of the Decree,
- it deletes the VPR from the register in the case as stated in Section 3 (3) of the Decree.

### ***8. Objection to the rejection***

The person making the proposal may raise an objection against the decision on rejection made by the Committee within 5 working days from the acceptance of the rejection notification, by specifying the reason, in a letter addressed to the Minister for National Economy.

The Minister decides on the objection within 10 days following the response of the Minister entitled to issue a professional stand, and there can be no further objection against this Ministerial decision. If the Minister accepts the objection, HCCI, based on the Minister's notification thereof, includes the adult training VPR in the register.

The objection against the rejection may not be submitted electronically.

### ***9. Registration of VPRs***

Based on the supportive decision of the Committee and the Minister for National Economy, HCCI includes the VPRs in the register. The VPR becomes effective for an indefinite time period. The register of VPRs shall include the following:

- the name of the VPR,
- indication of the trade group in the NVQR which the VPR can be linked to,



- indication for the determination and linking of its level according to HuQF,
- input requirements for starting the training (prior school attainment and vocational qualification, health aptitude requirements and the required practice),
- a brief description of the most typical activity/field of work that can be performed/filled with the concerned qualification,
- depending on the training form, the minimum and maximum number of training hours,
- the description of vocational requirements
- the ratio of the theoretical and practical training time
- the conditions for issuing the document certifying the obtainment of the vocational qualification

#### ***10. Deletion from the register***

Based on the decision of the Committee, HCCI deletes the VPR from the register if

- the VPR is published in the NVQR,
- the VPR has been regulated based on other authority type legal regulation,
- a decision has been made during the revision on deleting the VPR.

HCCI notifies NLO of deleting the VPRs from the register within 5 days.

## 6. Quality assurance of qualifications included in the NQF

### 6.1. Typology of the trainings in the non-formal training sector from the aspect of quality assurance

Based on the *National Strategy for Lifelong Learning for the period 2014-2020* and the definitions of the Adult Training Act, those trainings can be considered non-formal trainings which are organised for training purposes, have a curriculum but are provided outside the school system, and do not lead to a state recognised qualification. Regarding non-formal trainings, the Adult Training Act makes a distinction between regulated, supported trainings and “free” market trainings. Only the training types subjected to the Act are referred to as adult training by the law. Training types subjected to the law include other vocational, language and other (general) trainings provided outside the school system, whereas the latter one includes an extremely wide range of trainings and continuing trainings, from sectoral trainings regulated by separate legal regulations to trainings organised on a market basis. It can be considered a general principle that in the group of trainings the state only regulates those for which it takes responsibility regarding their contents or financing (see Figure 2 of Chapter 4).

In Hungary quality assurance is linked to the training and to the provider and indirectly to the qualifications. Presenting quality assurance of non-formal qualifications requires an approach to describe quality assurance of non-formal trainings. From this perspective non-formal trainings can be divided into 5 main groups from the aspect of quality assurance:

#### *1.) Adult training activities based on authorised and determined VPRs, VERs and LPRs*

These include trainings in adult training aimed at obtaining NVQR qualifications (type A trainings), other vocational trainings (type B trainings) and language trainings (type C trainings). Regarding the above training types, the law and its Implementing Decrees determine detailed quality assurance standards.

#### *2.) Authorised other (general) trainings and supported internal (in-company) continuing trainings:*

In the case of adult training activities belonging to this type (type D trainings), the state plays a supportive role, and the source of training can be: state budget or EU support, or a training implemented to the debit of the payment obligation of vocational training contribution. In such cases the adult training provider shall have a licence issued according to the Adult Training Act, however, it does not have to prepare a VPR and have it authorised, and it is also exempted from operating the quality management and quality assurance system as determined by the legal

regulation. However, the adult training provider shall provide the trainings based on a training programme complying with the aspects of the Adult Training Act, and conclude an Adult Training Agreement with the adult training participant. The training programme of the organisation providing internal training shall include the following elements in compliance with the Adult Training Act:

- the name of training,
- competences that can be acquired in the training,
- planned training time,
- the definition of the form of training delivery,
- curriculum units, their aims, contents, scope, as well as the number of theoretical training hours and if the curriculum unit includes practical training also the number of practical training hours assigned to the curriculum units,
- the maximum number of people in the group,
- the conditions for issuing a certificate on the training, and the completion of each curriculum unit of the training.

*3.) Authority regulated and sectoral vocational trainings, in-service training systems determined by legal regulations of the sector*

Due to their sector specific nature, the norms and quality assurance of these trainings fall within the regulatory power of the relevant ministries. When authority regulated trainings are implemented, no VPR shall be prepared, and the organisation of trainings is not subjected to an authorisation procedure either. Section 1 (5) of Act LXXVII of 2013 on adult training lists the trainings belonging to this category, which are public service trainings and in-service trainings, sectoral trainings provided based on the Health Act, trainings of the teachers' in-service training and special examination system, course type vocational and compulsory in-service trainings accredited by the Ministry of Culture, and the group of authority regulated vocational trainings and legal and public procurement trainings.

Within the compulsory in-service training system, teachers' trainings have to be accredited separately. The request for establishing a teachers' in-service training can be submitted by any legal personality to Educational Authority. The request for establishment is evaluated by the In-service Teacher Training Accreditation Body (ISTTAB)<sup>29</sup>. Compulsory in-service trainings organised for cultural experts shall be also accredited. The requirements of the training system and the financing of training are set forth by no. 1/2000. (I. 14.) Decree of the Ministry of National Cultural Heritage. The Minister shall decide on the accreditation of the vocational compulsory in-

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<sup>29</sup> List of teachers' in-service trainings:

<http://pedakkred.oh.gov.hu/PedAkkred/Catalogue/CatalogueList.aspx>

service training programme by involving a special committee, within a public administration procedure, by a decision<sup>30</sup>. A compulsory in-service training system is operated for health workers as well. Pursuant to Section 4 (2) of the no. 63/2011. (XI. 29.) NEFMI Decree of the Ministry of Human Capacities on the rules of in-service training for skilled health workers, the compulsory in-service training according to trade groups of skilled health workers can be organised by medical or health science faculty of higher education institutions, the Health Registration and Training Centre, as well as by health institutions that obtained authorisation through the stated accreditation for providing compulsory in-service trainings according to trade groups and health VET institutions providing training within the school system.<sup>31</sup> The trainings provided pursuant to the no. 273/2012. (IX. 28.) Government Decree on the in-service training of public servants also belong to the system of compulsory in-service trainings. The in-service training of government officials and public servants is the task of the state; the trainings are implemented by the National University of Public Service.

In addition to the above, a compulsory in-service training system is operated in several other professional fields, for example for engineers, certified public accountants, etc.

*4.) Trainings implemented in programme financing, according to social and economic aims – for catching up or related to public employment provided by state institutions.*

The former 9 regional labour market training and retraining centres as adult training state institutions have been operated as the regional offices of Türr István Training and Research Institute since 30 June 2011. Adult training activity provided by them is almost exclusively implemented from an EU or state source therefore the training programmes have to be authorised according to the effective Adult Training Act. Türr István Training and Research Institute as an adult training state institute, providing its trainings subjected to the Adult Training Act, shall meet all regulations of the Adult Training Act as other institutions providing authorised trainings (it shall have its trainings authorised, maintain a quality assurance system, have all the personal and objective conditions as stipulated by the legal regulation, etc.). The elements and standards related to the quality assurance of type D trainings are usually included in the programme financing document or call for applications in the case of an EU fund.

*Free market trainings and non-state-funded in-company trainings*

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<sup>30</sup>Register of accredited vocational in-service training programmes in general education: [http://2010-2014.kormany.hu/download/e/0c/11000/Akkreditalt\\_kozmuvelodesi\\_programok\\_2013.pdf](http://2010-2014.kormany.hu/download/e/0c/11000/Akkreditalt_kozmuvelodesi_programok_2013.pdf)

<sup>31</sup> List of compulsory in-service trainings according to trade groups:

<https://szaftelex.aeek.hu/szaftelex/szaftelex/EntKtkListLazy.xhtml?jsessionid=CB6543DC105965ADBEC20FE5C0752495>. Professional contents:

[https://dl.dropboxusercontent.com/u/1271946/tovabbkepzes/kozponti\\_szakmai\\_tartalmak.pdf](https://dl.dropboxusercontent.com/u/1271946/tovabbkepzes/kozponti_szakmai_tartalmak.pdf)

Non-funded in-company trainings organised on a market basis are trainings that are not considered an adult training activity according to the Adult Training Act, not subjected to the legal obligations imposed by the Adult Training Act, as well as these trainings do not have to be registered and authorised, and no complicated documentation has to be prepared. This training group includes trainings organised by companies to the debit of their own incomes. Trainings organised by training institutions, having no permit and providing free trainings can be short vocational type trainings (e.g. semi-skilled training, training aimed at developing special vocational competences, refreshing trainings, continuing trainings<sup>32</sup> etc.), language trainings and general competence development trainings (typically trainings) or general trainings related to culture, hobbies, free time or lifestyle. The quality assurance of the trainings is the competence of the training institution, company. Some legal norms also relate to market-based training services that can be free provided, namely Act CLV of 1997 on consumer protection and general legal regulations related to consumer protection. (Farkas – Henczi, 2014.).

## 6.2. Change in the quality assurance of non-formal trainings

The Adult Training Act of 2011 introduced three elements from the aspect of quality assurance: the compulsory registration of training institutions, as well as institutional and programme accreditation. An accredited institution shall have a quality management and quality development system approved by the Adult Training Accreditation Body (ATAB). The accreditation of the training programme included analysing the training programme documentation in relation to whether it complies with the content features as stipulated by the law. The previous regulation and quality assurance of non-formal training was often criticised that regulation and market mechanisms could not lead to higher training quality, i.e. adult training institutions competed to offer better prices/number of training hours and not quality. The new regulation (Adult Training Act of 2013) imposes different requirements on the training activity and the adult training institutions, intending to make a distinction according to the aim and content of the training. The original aim of legislation was to strengthen the control with a focus on the profession and content in the control of training process. The stricter authorisation

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<sup>32</sup> Most of these trainings cannot be authorised according to the presently effective Adult Training Act. These trainings do not comply with the regulation according to the no. 59/2013. (XII. 13.) NGM Decree of the Ministry for National Economy on the VPR therefore no VPR can be elaborated for them and they cannot belong to other vocational training, i.e. cannot be authorised among type „B” trainings. At the same time as they include vocational competences they cannot be authorised among other trainings belonging to type D either.

rules and criteria, and the elaborated requirements system for the profession and content were to exclude trainings of poor quality from the group of supported trainings (Bertalan, 2015). At the same time, the authorisation system as well as the professional and contentual control became stricter mainly from an administrative aspect.

### 6.3. Quality assurance of the regulated and supported trainings in the non-formal training sector

Act LXXVII of 2013 on Adult Training (Adult Training Act) and its Implementing Decrees introduced **adult training licence** instead of adult training accreditation (institution accreditation and programme accreditation). If an institution intends to obtain a licence for providing adult training, it has to introduce and operate a quality assurance system. According to the regulation of the quality assurance of trainings, training activity is considered to be a learning process implemented in an organised and purposeful method, which does not become separated from the outcome of training and learning therefore observing the quality standards and procedures aimed at the training process elements becomes a guarantee for the quality of training. In the sense of the above approach with a focus on regulation, a learning outcome can only be produced by “some formalized” activity therefore quality assurance is also aimed at the above process elements instead of the learning outcome, “qualification”. Administrative and rigid over-regulation of the process elements in quality assurance (see later in detail) in many cases may become an obstacle to using more flexible learning forms, as well as various and varying learning methods and conditions. The concepts used in regulation are often confusing from a pedagogical aspect. The authorisation procedure used as a part of quality assurance is in many cases dysfunctional and far from practice in several elements from the aspect of implementing the training activity. The quality assurance system is less suitable for functioning as a regulation system for content. From the interviews made with the representatives of training institutions and training business enterprises<sup>33</sup> and based on the practical implementation of the law, a pronounced opinion was outlined that the regulation for the privatisation of adult training, with a legal system that cannot be complied with and far from practice, as well as constant fear from control and penalties do not improve training quality but leads to only formal and documented “compliance” with the requirements.

*Below the quality assurance of the trainings in the non-formal training sector is described only for the training types affected by the regulation.*

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<sup>33</sup> Also related to the Country Report, the Educational Authority conducted an empirical research, and within its frames several structured deep interviews were carried out, among others with adult training institutions and training business enterprises.

### **6.3.1. Quality assurance of non-formal (adult) trainings provided based on authorised VPRs**

Pursuant to the law, adult training activity may only be provided with an official licence. Criteria of providing adult training are divided into two groups by the law:

- a) criteria system required for obtaining the licence,
- b) criteria system required for operation.

Though the above two criteria systems though can be separated in their elements, at the same time they are closely linked and built on each other. An adult training licence can be granted only to the organisation that has:

- elaborated VPR and/or LPR for the trainings and training programme, except for the institutions providing other, type “D” trainings,
- the personal and material conditions required for implementing the trainings,
- a quality assurance system according to the legal regulation,
- the conditions required for operating the Adult Training Information System,
- the conditions required for operating a customer service and complaint management system,
- it determines quantifiable quality aims and indicators that can be checked from the aspect of content,
- it proves having the determined financial guarantee. (Farkas – Henczi, 2014.)

#### **6.3.1.1. Criteria system required for obtaining the licence**

The phases of authorisation are the following: preparing the request, documenting and certifying the annexes of the announcement, inspection by the Expert Committee and on-site visit, decision on issuing the licence and including in the register. HCCI maintains an electronic register of training institutions having a licence.

#### ***Vocational requirements***

In trainings belonging to types A, B and C a permit can be obtained for only those trainings whose training programmes were prepared based on the relevant vocational or language programme requirement.

Introducing and using VPRs and LPRs is a new element in the regulation of adult training. In the case of other vocational trainings and language trainings (type B and C trainings) the

preparation of the training programme was converted into a two-phase process. Regarding other vocational trainings, the basis of the training programme is determined by the VPR (vocational programme requirement), whereas in the case of language trainings, it is defined by the LPR (language programme requirement). VPR is approved and included in the register by the Programme Committee of HCCI. VPR becomes public after the inclusion in the register, and if anyone intends to start a training according to the VPR, they have to do this according to the requirements in the VPR. A VPR proposal can be submitted by any legal person (training institution, employer, professional organisation, etc.) to HCCI, it is of no importance who submitted the VPR, the concerned person has no “ownership” for it. The aim of VPR is that trainings in the other vocational trainings group can be implemented based on a uniform requirements system. By doing so the legislator wanted to avoid authorising several hundred or thousand training programmes under different names and with different numbers of training hours for trainings with identical or very similar contents. The Programme Committee of HCCI does not include another VPR in the register under the same name and with similar content. If anyone intends to start other vocational programme, first they shall check whether there is a registered VPR. If there is one, they shall elaborate their own training programme based on that, and have it authorised. If there is no such VPR, first they have to elaborate the VPR and submit it to HCCI.

So in the case of other vocational trainings the training programme consists of two phases. First the VPR has to be elaborated and registered by HCCI then based on that the training programme has to be elaborated and authorised by NOVETAL. VPRs state the contentual requirements imposed on training participants, as well as they determine the learning outcomes that have to be achieved by training participants by the end of the training, and based on which the training participant is entitled to obtain a certifying document certifying a vocational qualification. VPRs have to be worded in the context of the HuQF level descriptors. Pursuant to Section 18 (7) of the Adult Training Act, linking the programme requirement to the HuQF levels is performed by HCCI based on the recommendation for linking provided by the person preparing the programme requirement. Presently the programme requirements do not have to include the linking of VPRs to the HuQF levels. The no. (59/2013. (XII. 13.) NGM Decree of the Ministry for National Economy sets forth the contentual and procedural protocol of the preparation of the programme requirement. The programme requirement template (procedure described in Chapter 5 and the form included in Annex 2) is available on the website of HCCI, and HCCI examines the compliance of the submitted request with the expectations for the programme requirements as included in the regulation.

The training programme has to be elaborated according to the VPRs or LPRs included in the register. HCCI publishes a document template on its website for the preparation of the training programme. This means that training programme remains the central element of the adult training activity, which is the only professional regulatory/prescriptive document that provides a basis for the concrete implementation of the of the training activity, and records the information for the content and organisation of a training. The preliminary assessment of the training



programme may be performed by an adult training expert or adult training programme expert who is included in the recommendation list maintained by NOVETAL<sup>34</sup>. After the training programme requirements have been successfully fulfilled, the training participant receives a certifying document with the content as stated by the legal regulation. The contentual and formal elements of the certifying document certifying the obtainment of a vocational qualification are included in Annex 1 of the no. 59/2013. (XII. 13.) NGM Decree of the Ministry for National Economy. (Farkas, 2016.)

#### **6.3.1.2. Criteria system related to operation**

The regulation (no. 58/2013. (XII. 13.) NGM Decree of the Ministry for National Economy) stipulates the compulsory, standard elements of the quality management and quality assurance system. The institutions are free to decide whether to establish their own quality assurance system in compliance with the approved quality assurance framework, or to choose one of the accepted frameworks and adapt the standards to their own organisations. Frameworks are not elaborated by the authority but it expects recommendations for this from organisations with experience in quality assurance. Such request can be submitted by the creator, owner of any quality assurance system. The Minister responsible for the vocational qualification decides on the framework according to the standards based on the opinion and proposal of ATEC.

The quality management and quality assurance system of the institution also covers the overall institutional regulation of operation-related activities, and based on PDCA logic – plan, do, check, act – the regulation of change management tasks. The standards of the quality assurance system include the following elements:

- overall institutional quality policy and the related strategy for the quality assurance of the training activities,
- regulated and documented internal mechanisms for the approval of starting, monitoring and regular internal assessment of the training programmes,
- management of change, procedures for handling problems that emerge during operation,
- self-assessment for the activity of the institution,
- procedures for providing permanent continuing training and qualifying of trainers,

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<sup>34</sup>The recommendation list is available on the website of NIVE:

[https://www.nive.hu/index.php?option=com\\_content&view=article&id=476](https://www.nive.hu/index.php?option=com_content&view=article&id=476) Expert activity is regulated by the no. 14/2014. (III. 31.) NGM Decree of the Ministry for National Economy on the detailed rules of adult training expert and adult training programme expert activity.

- providing the resources required for the implementation of the training programme,
- ensuring the collection, analysis and use of the information to provide the efficiency of training activities:
  - collecting and analysing the data related to training participants' learning outcomes,
  - collecting and analysing the data related to training participants' satisfaction assessment,
  - collecting and analysing the data related to trainer's performance,
  - collecting and analysing the data related to the labour market use of the competences acquired through the trainings,
- according to transparency requirements, publishing the quantitative and qualitative information related to the training activity.

The majority of adult training institutions already obtained institutional accreditation qualification before the introduction of the new regulation, and several institutions have some certified (e.g. ISO, EFQM, TQM) quality management system. The institutions with such systems have to adapt their own systems to the expectations of the quality assurance frameworks (Farkas – Henczi, 2014).

#### **6.3.1.3. The process of quality assurance**

HCCI as a public body has decisive powers and in certain cases exclusive decision making competences in relation to non-formal trainings (see Chapter 3 in detail). HCCI gives the submitted VPR to an external expert for assessment then Adult Training Expert Committee (ATEC) with five members decides whether the proposal complies with legal regulations and can be included in the register.

Members of the expert committee are recommended by ATEC. For the assessment of the content and internal coherence of training programmes, the training programme elaborated by the institution has to be qualified in advance by an adult training expert or an adult training programme expert. In this the expert examines whether:

- a) the content of the training programme meets the legal requirements,
- b) the competences stated in the programme can be acquired by the target group of the training with the content, criteria and in the method as stated by the training programme,
- c) the training programme complies with the requirements in the relevant vocational or language programme requirements,

The expert has to prepare a written expert opinion that has to be provided to the adult training institution ordering the preliminary assessment of the training programme. (Farkas, 2016.)

## ***Monitoring and checking the quality of training***

### Determination of quality features (indicators)

As a part of its quality assurance system, the training institution shall define indicators (e.g. for planning and contentual revising of the training programmes and curricula, the success of training, drop-out, or self-assessment). During the interviews, the managers of two big training business enterprises noted that the expected quality indicator system needed too much administration to be done by the training business enterprises, e.g. if target values assigned to the quality features are not achieved, the adult training institution has to reveal the reasons, make a plan for solving the problems, which reduces the flexibility of training.

### Self-assessment

Self-assessment required as a part of the quality assurance system is a regular activity, which is performed by the training institution with a specified frequency. Self-assessment is carried out by the training institution according to the processes and indicators stated as a part of the quality assurance system.

Self-assessment has to be prepared in the form of a self-assessment report, which means the basis of external assessment carried out by ATEC.

### External assessment

The institution shall have an external assessment prepared for the activity of the institution at least once every four years. An external assessment can only be prepared by a legal person whose quality assurance system submitted to the authority has complied with the criteria for the quality assurance framework, and its applicability has been approved by the relevant Minister. As a result of the external assessment, an action plan has to be prepared, which includes the recommendations for the current tasks that promote the greatest possible convergence between the strategic efforts and quality aims of the institution and the objective and factual indicators of institutional operation. The institution shall publish the assessment and the recommended actions on its website, or in the lack of the above, in a way that is locally common.

#### **6.4. The quality assurance system from the aspect of training institutions and stakeholders**

The VPR system is a completely new element of the regulation of adult training, and it was introduced about 3 years ago. The aim of introducing the VPRs was to establish a uniform requirements system for non-state recognised other vocational trainings, and thus to achieve a higher labour market prestige for other vocational trainings. However, the efforts made for increasing their labour market prestige cannot be successful as compliance with the labour market is not implemented regarding the VPRs from a quality assurance aspect. The typical procedure is the following: a training institution elaborates a VPR, which is evaluated by the Programme Committee of HCCI whether it meets the improperly regulated requirements system, and the labour market demands. Nevertheless, VPRs are not validated by anyone (e.g. an employer's or professional organisation, etc.) thus no quality assurance element is implemented in the process, and the credibility of vocational requirements can be questioned from the aspect of labour market. The VPR system should be implemented from the aspect of the employer and employment. Therefore, it is reasonable that the persons making the proposals should be employers, employer's organisations, professional organisations, or adult training institutions supported by the above. The assessment closing the training is not explained in the VPR, this is a competence of the training institution although a uniform assessment system should be a criterion for a uniform requirements system.

According to the opinions of the training institutions and the stakeholders involved in the research the quality assurance system is over-regulated, similar to when a production plant has to describe its quality standards. Standards and process descriptions have nothing to do with the quality of the actual training. The quality assurance approach regulates the process itself but it does not provide the quality of learning outcome. The opinions were consonant regarding that quality assurance in its present form means excessive administrative work, whose documentation is a great burden for the training institutions. Setting quality aims practically creates absurd situations such as: quality aims (e.g.: the average study results of the group taking an examination) have to be set for the trainings when the trainings are not started yet. As a part of the quality assurance system, quality aims have to be set for such fields as well that training institutions cannot or can only slightly influence. Regulation is not flexible, changes can be only implemented in long amendment processes. Opinions were definitely not against regulation, they only emphasized that the above quality assurance system is only suitable for the administrative exercising of state control but it is not proper for implementing the quality of trainings.

## 7. Costs of including non-formal sector qualifications in the NQF

This chapter deals with the costs of NVQR qualifications obtainable in type A non-formal training, and certificates obtainable in type B vocational trainings.

### 7.1. Costs distribution of non-formal training and obtaining a qualification (general financing features)

Pursuant to (Point 26 Section 2 and Section 23 (1) of) the Adult Training Act those trainings are considered supported trainings that are partly or completely implemented to the debit of state budget sources (also including the EU sources and vocational training contribution). Based on Section 23 of the Adult Training Act, the support sources of adult training are: the state budget<sup>35</sup> as well as the part of the vocational training contribution that can be recognised for those entitled thereto, and for the training of own employees<sup>36</sup>. Financing of non-formal training happens through several channels, in addition to the state supports of adult training, the contributions of employers and individuals are determinant in the financing of trainings.

Studying the cost-bearing participants of non-formal training shows that while state sources were constantly decreasing from 2009, training costs of half of participants in adult training were paid by the employers until 2012 (it was 52% in 2011 and 47% in 2012). Employers trained employees mainly to the debit of their revenues (it was 33% in 2011 and 45% in 2012), secondly, they spent the part of their vocational training contribution obligation that can be used for their own employees for training (it was 19% in 2011 and 2% in 2012). The second greatest financing factor in adult training is the individual itself (it was 24% in 2011 and 28% in 2012). In 2013 training participants' costs were financed equally by EU sources and by the individuals themselves (in 30-30%). In 2013 the number of trainings with EU financing and participants in them considerably increased. State sources remained insignificant in the last years, they tended to stagnate at about 3% (*Farkas, 2016*).

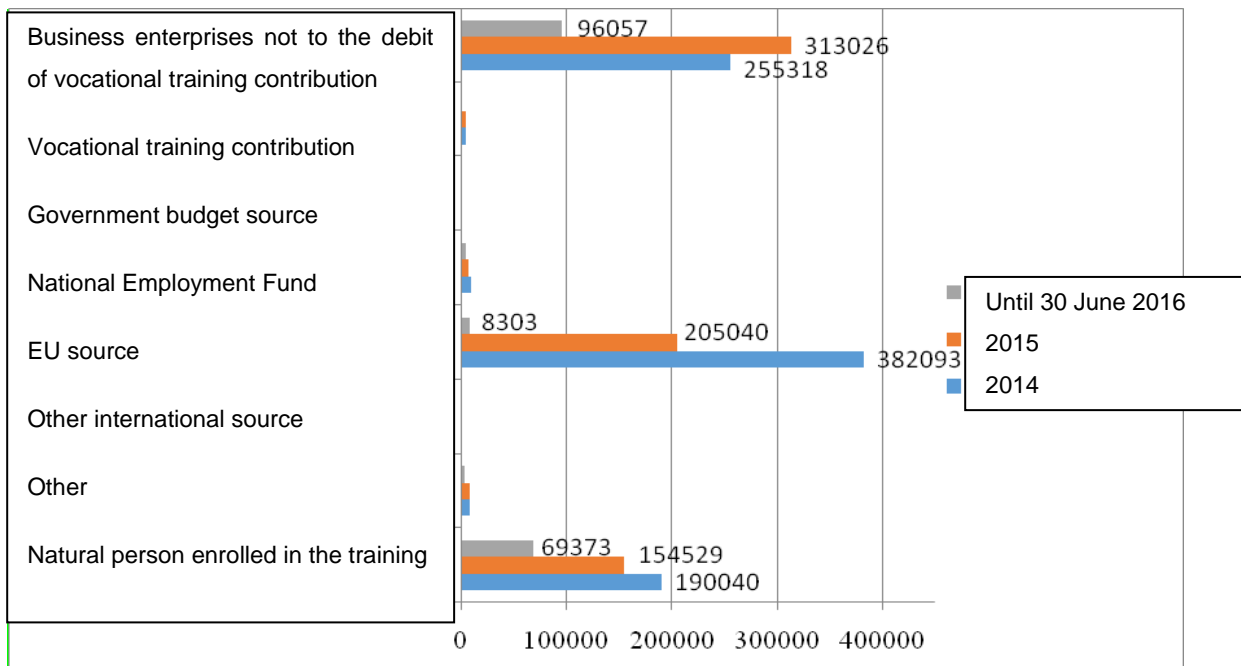
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<sup>35</sup>The money from EU sources that the government can influence, e.g. the sources for SROP, EDIOP, HRDOP programmes are also considered as state budget sources. Direct financing from Brussels (e.g. Erasmus+ programmes) do not belong to the support sources of adult training therefore these training programmes do not have to be authorised according to the regulations of the Adult Training Act.

<sup>36</sup> The (gross) amount of vocational training contribution remained 1.5% of the health insurance and labour market contribution base. However, the training costs of own employees can be recognised by only those companies obliged to pay vocational training contribution that provide the practical training of minimum 45 students with student agreement monthly. Usability became half of the former one from 2012, i.e. 16.5% of the gross obligation amount (Section 5 of Act CLV of 2011).

By 2014 the financing structure of adult training changed to a great extent. The ratio of adults participating in training financed by EU sources continued growing (44.4%). The second greatest financing factor was the employer (30%) and also individuals had a considerable part in financing the trainings (22%). The number of those participating in trainings implemented to the debit of the vocational training contribution, the National Employment Fund and the government budget sources is insignificant (Graph 2). By 2015 EU sources had been used up due to which ratios changed. Business enterprises became the most important financing factor (41%), while 27% of training participants studied to the debit of EU sources, and 20% was the ratio of individual financing (Figure 3) (*Farkas, 2016*).

**Figure 3.** Distribution of participation in adult training by financing types (persons)



Source: National Statistical Data Collection Programme, cited from: *Éva Farkas, 2016, page 40*

Typically, trainings implemented to the debit of the EU, the budget source and the vocational training contribution are authorised trainings. In the case of trainings financed by companies, one third of participants took part in authorised trainings.

## 7.2. Costs of linking NVQR qualifications obtainable in non-formal training to framework levels

In the case of NVQR qualifications,<sup>37</sup> the basis of the training programme is the VER issued by the responsible Minister in a decree, as well as the no. 217/2012. (VIII. 9.) Government Decree including the task and competence profiles of the modules of requirements. If the training can be started within the school system, the regulations of the vocational training framework curriculum for the concerned qualification shall also be taken into consideration during the elaboration of the training programme.

NVQR qualifications are state recognised qualifications, which are linked to the HuQF levels together with the elaboration or analysis of the VER of the NVQR qualification. The process of creating and modifying the qualifications is regulated by the VET Act and the no. 25/2016. (II. 25.) Government Decree on the NVQR and the order of procedure of modifying the NVQR. Pursuant to the Act (Section 80 of VET Act), NQC is a professional body to make proposals and give opinions for the continuous development and modernization of the content structure of VET. NQC is to continuously monitor the development of the VET structure, the economic, labour-market, technical-technological processes, and based on the above it can make proposals for modifying the NVQR in compliance with the government decree on the order of modifying the NVQR<sup>38</sup>. The Minister responsible for the qualification determines the VERs of the qualification for the qualifications included in the sector. The decision on the list of qualifications and together with this on the proposal for linking to the framework levels is made by the Government through a decree.

As the modification and creation of state recognised qualifications is the task of the state, the costs of linking the qualifications to the framework levels shall be borne by the state budget.

Linking the NVQR qualifications to the HuQF levels was carried out between 2012 and 2015 by the Government to the debit of the SROP 2.2.1 programme financed from the European Social Fund (ESF). During the development of the HuQF, all state recognised NVQRs (462 pieces) were linked. Linking happened within the frame of a research-development project. The total expert cost of linking was<sup>39</sup>: EUR 418,548 (HUF 129,750,000).

Within the project the following qualifications were linked:

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<sup>37</sup> The NVQR as modified by the no. 25/2016. (II.25.) Government Decree already includes NVQR qualifications linked to the HuQF levels. NVQR qualifications were linked between level 2 and level 6. From September 2016 certificates can include the HuQF/EQF level of the concerned qualification.

<sup>38</sup>NQC consists of thirty members, i.e. the Minister responsible for VET and adult training, the Minister responsible for education, the Chamber of Economy, the national organisations for the representation of economic interests, as well as the representatives delegated by the professional chambers interested in the whole sector. NQC establishes sub-committees by trade groups. The operation of NQC is provided by the VET and adult training body of the state.

<sup>39</sup> EUR 1 = HUF 310

|   |     |
|---|-----|
| NVQR Qualification  | 489 |
| NVQR Partialqualification   | 152 |
| Mastertitle (HCCI)  | 74  |
| Mastertitle (National Chamber of Agriculture)                                     | 24  |
| SVME (vocational maturity examination requirements within and outside the sector) | 38  |
| Authority regulated qualification   | 23  |

Due to the logic of the development project, no conclusion can be drawn from the above costs for the real costs of linking a qualification and the time spent thereon. When qualifications were first linked to the framework, several development tasks emerged that will not mean any cost later. In the project 800 qualifications were linked; therefore, a great number of descriptions corresponding to the HuQF descriptors had to be prepared and validated. Validation was performed by an expert from the employer and employee side so that labour market feedback and expectations can be also integrated in the determination of levels.

One expert worked on one qualification 2-4 expert's days depending on its complexity. Besides, within the trade groups of the qualifications; there was an expert coordinator, who coordinated the experts and harmonised the descriptions mainly when qualifications had several overlapping modules<sup>40</sup>.

### 7.3. Costs of linking certificates obtainable in type B non-formal training to framework levels

Based on Section 18 (7) of the Adult Training Act, linking VPRs to HuQF levels is the task of HCCI.

Based on the linking by trade groups according to the NVQR, HCCI links the vocational qualifications to trade groups with an ID, as well as determines and links the VPRs to the levels of the HuQF related to the EQF (*Farkas – Rettegi, 2016*). HCCI started linking the VPRs to the framework levels at the end of 2016, information on costs calculation is not available presently. HCCI can finance the expert costs of linking from two sources: (1.) on the one hand, for performing its adult training tasks as stated by the legal regulation, HCCI receives the support to the debit of the state budget of the training fund part of National Employment Fund based on an agreement concluded with NOVETAL<sup>41</sup>; and as linking is a basic task of the Chamber, this source can provide the costs of linking (2.) on the other hand, the administrative service fees related to the authorisation procedures of the adult training activity can also constitute the cover for linking costs. At the same time, linking costs do not appear explicitly in the composition of the costs emerging on the service provider side (see: Table 3).

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<sup>40</sup> Lecture given at closing conference of the SROP 2.2.1. project.

<sup>41</sup> No. 16/2016. (V. 27.) NGM Decree of the Ministry for National Economy on the detailed rules of supports grantable from the National Employment Fund training fund part for certain VET and adult training purposes.



Adult training activity is bound to an official licence. In order to start the training after the obtainment of the licence, as required by the relevant ministerial decree, a programme requirement, or if there is no registered programme requirement, for the concerned other vocational training a training programme has to be prepared and authorised. The authorisation procedure is subjected to a fee. The issuance, modification or supplementation of the licence for providing adult training is also subjected to a fee.

The training institution shall pay an **administrative service fee** as stated on submitting the request or announcement, and the basic fee shall be paid every time when a modification or supplementation happens.

The extent of the administrative service fee to be paid in the authorisation procedure for providing adult training activity, and the rules of use, as well as the order of payment of the penalties imposed during the control of adult training institutions are set forth by the no. 56/2013. (XII. 4.) NGM Decree of the Ministry for National Economy. The fees in the decree are differentiated according to the training type to which the request relates to, whether it is for issuing, modifying or supplementing a licence, and the number of trainings the requester intends to provide.

**Table 3.** Costs of the authorisation procedures of adult training activity and providing adult training activity<sup>42</sup>

| Cost types and activities  | Fees and costs   | Fees charged on the training institutions or business enterprise |
|--|--|--|
| Issuing (first time) and modifying an official licence                         | For NVQR training, type B other vocational trainings: a basic fee of EUR 322 + EUR 219 per training programme.   | +  |
| Preparing an official licence with request                                     | A basic fee of EUR 203 + EUR 219 per training programme.   | +  |
| Supplementing an official licence with announcement                            | EUR 39 per training type   | +  |
| Preliminary evaluation of the training programme by an expert                  | Maximum EUR 193 per training programme   | +  |
| Including a VPR in the register and the registration of a training institution | Free<br><br>However, the announcement of any change in the data of the training institution holding a licence and included in the register involves a fee of EUR 18 per announcement.  | +  |
| Financial guarantee  | 2% of the actual net revenue from selling adult trainings in the year preceding the concerned business year<br><br>but minimum EUR 1,613.<br><br>In the case of a state budget institution no financial guarantee is needed. | +  |

<sup>42</sup> EUR 1 = HUF 310

|  |  |   |
|--|--|---|
| Revision of the quality assurance system by an external expert every 4 years <sup>43</sup> | As stated by the announcement of the Minister for National Economy yearly  | + |
| The establishment and operation of quality assurance system                                | Varies by adult training institutions                                      | + |
| Official external inspection every two years <sup>44</sup>                                 | Performed by a regional government office to the debit of the state budget |   |

*Source: Based on Act LXVII of 2013 and the no. 56/2013 (XII.4.) NGM Decree of the Ministry for National Economy, edited by Éva Farkas and Lajos Henczi*

Adult training institutions need considerable financial means to perform their activities. Standard costs (administrative fees of permit, preliminary qualification, programme requirement, financial guarantee and external evaluation) affect all adult training institutions operated under the effect of the law. Changing costs (quality assurance, personal – objective conditions, preliminary assessment of knowledge, and considerable administration) depend on the organisational structure, business policy and capital intensity of the adult training institution.

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<sup>43</sup> In the case of adult training permits issued before 30 June 2014, due to the prolongation of the decision on the legal personalities to perform external evaluation, the authority examines from 01 July 2016 whether the adult training institution has had the external evaluation performed as stipulated by the legal regulation.

In the sense of the above, in the first quarter of 2016 those institutions should have the external evaluation performed that received their permit before 30 June 2014 so that external evaluation can be made before the official inspection being compulsory every two years, which would help preparation therefore.

<sup>44</sup> As of 18 June 2016 adult training institutions holding a licence are not inspected during their external official control related to the external evaluation of their quality assurance system.

## 8. Current debate on further developments

State recognised vocational qualifications, higher education qualifications and primary and secondary educational attainment were linked to the HuQF as a part of the ESF SROP project to support the implementation of the development process. During the project periods an intensive professional discussion was conducted between the experts, and within the projects mainly recommendations, ideas or criticism was expressed, which have not been channelled into decision-making yet. With the projects closed, the above impetus disappeared, and with the referencing report accepted, the external compulsion for EU conformity generating the professional debates on the framework also vanished.

In the SROP project, experts expressed their opinions on the institutionalisation of operating the HuQF. According to experts' opinion, the establishment of a Hungarian Qualifications Board (HQB) and its Secretariat dealing with linking of old and new qualifications and maintaining the framework, updating databases, and performing international tasks is essential for the operation of the HuQF. The above coordinating and supervising body was to perform expert's, coordination and supervisory-monitoring tasks. Recommendations for linking each qualification were to be made by the HQB Secretariat for confirmation by the HQB, whereas codification tasks emerging from linking were to be initiated by the Deputy State Secretary relevant in the special field. An important prospective task of HQB is to elaborate, fill and maintain a national qualifications register, and to strengthen the learning outcomes approach: preparation for using and linking learning outcomes, organisation of trainings, and preparation of methodologies. In addition to the experts' opinion, it is an opinion preferred by the policy as well that according to the sectoral regulation, the operation and current tasks of the framework (development, linking, quality assurance, etc.) should be provided and performed according to the own internal system of responsibilities and mechanisms of each education and training sector.

Following linking, so far no regulation for the maintenance and operation of the HuQF has been adopted to provide the regulatory, institutional and financial background of the function of HuQF legitimated by the government. Considering the future of the HuQF, there is no vision and strategy decided by the government either regarding what schedule, methodology and development frame should be used for further development of the HuQF, and what this should cover. In this chapter the dilemmas and ideas that emerged within certain expert groups and consultations are introduced in the first place, and not those expressed by the policy makers.

### 8.1. Policy aims and future of the HuQF

The proposals of the government for further development of the HuQF included the following aims of the qualification framework among others:

- Contributing to the creation of a more unified qualification's system by bringing closer of the qualifications regulations in the different sub-sectors of education and training, strengthening the outcome nature of qualifications' regulations, and thus helping their harmonisation,
- including the non-formal sector qualifications and the qualifications issued in the formal sector in a common, uniform frame, and thus promoting the transparency and understandability of the relations among the qualifications;
- strengthening the quality assurance systems of education and training, and supporting the creation of a harmony between them,
- recognising learning outcomes achieved within non-formal and informal learning,
- strengthening policy coordination within the education and training system, and the cooperation with the social partners,
- achieving a more efficient orientation of establishing new qualifications, revising already existing qualifications, as well as planning and elaborating educational and training programmes content,
- supporting a more successful operation of the systems for the individual's career choice, lifelong guidance and consultation services,
- providing systemized information on the qualifications interpretable even in a European context to all employers,
- strengthening educational and training services in the labour market.

Almost nothing seems to have been implemented from the above ambitious targets. Sectoral separation remained strong regarding the qualification systems and their regulations, there is no uniform methodology for linking to the HuQF, and the authorities responsible for the qualifications perform their linking in their own institution system, in compliance with their order of procedure, regulation standards, quality assurance framework, only relying on the compulsory consultation within the state administrative conciliation procedure. Due to the lack of regulation for the introduction of the framework, the effect of the HuQF on the outcome regulations and their standards is insignificant. At the same time, it should be emphasized that in the past five-eight years, as a result of SROP development projects, although not masses but more and more people understand the outcome-based approach, and its tool, i.e. the use of learning outcomes in the descriptions of requirements.

The HuQF is mainly a metaframe due to its abstraction level and the general nature of descriptors, which could only help the inclusion of the qualifications issued in the different education and training sectors into the uniform frame with different guidelines and sectoral, sub-sectoral descriptions that could also improve the transparency and understandability of the relations among the qualifications. A professional and stakeholders' debate would be needed on the framework, during which level descriptors that are more detailed and more precise, and give better reflections on the sector-specific features of the qualifications could be elaborated. The more precise and more detailed level descriptors prepared in SROP 4.1.3 project for levels 5, 6, 7, 8 of the framework taking the study fields of higher education into consideration are a good example of this. Without this, the framework cannot provide a more successful orientation of the establishment of qualifications, the revision of already existing qualifications, and the planning and elaboration of educational and training programmes.

In expert discussions, the policy coordinating and system building function of the HuQF emerges several times, which is referred to in the government proposals in an implicit way when the policy functions of the framework is listed. At the same time, no regulation gives such a definite task to the framework, and the institutionalisation of the framework is missing from the regulation. Presently, in the legal sense the framework is still in a project status. A responsible organisation/body should be established so that tasks can have system level ownership, who would approve and comment linking to levels at the same time as well. This organisation/body should be responsible for the quality assurance of the framework and it should protect the accreditation of linking (when new qualifications are linked), as well as perform the professional, coordinating, communication and knowledge-sharing tasks related to the further development and efficient use of the HuQF.

During the national professional conference to introduce the HuQF<sup>45</sup> experts agreed that the HuQF on the one hand was a tool for creating transparency at a European level, which is served by the HuQF and EQF levels' number in the certificates and qualifications, at the same time it was a very abstract tool, which could be used for different development aims, and if it was used and filled with content, it could start working as a common tool of the actors and stakeholders in education, training and labour market, and as a result of their cooperation. Experts emphasized that the framework could comply with the above aim only if a quality assurance system was linked to it and learning outcome-based training description was really prepared during implementation in each educational sub-sector then in non-formal training as well. In any other case it simply means an additional administrative burden but it will not be put into use. In experts' opinion the HuQF can serve the following indirect aims:

- HuQF as a communication tool can be a catalyser of the conscious, coordinated and long-term developments of the Hungarian education and training sector.
- It can serve the quality development of the Hungarian education and training system.
- It can be a tool for bringing labour market demand and training supply closer to each other by comparing training contents and aims to labour market competences through the learning outcomes.
- It can have an effect on the spreading of student-centred pedagogical culture, whose basic elements are:
  - preliminary communication of the expected results;
  - coherence between the training aims, contents, chosen methods, ways of evaluation and the preliminarily stated learning outcomes;
  - operating an educational culture and system that endeavours for equity.

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<sup>45</sup> A conference implemented in April 2015 organised jointly by EA and Tempus Public Foundation.

- Flexible training paths, permeability, supporting individual learning and career, establishing related services, recognising prior learning.

In the 2014-2020 financial period of the European Structural and Investment Funds (ESIF), the preparation of a framework strategy for lifelong learning (LLL) by the government is stipulated by the European Union regulation<sup>46</sup> as an ex-ante criterion for using the support of the ESF. The national framework strategy of the government for the policy of lifelong learning<sup>47</sup> calls for the further development of the HuQF as one field of intervention. It emphasizes that *“non-formal sector qualifications need to be placed within the scope of the framework, the framework needs to be connected to the validation system, and its relationship with lifelong career guidance needs to be strengthened. Efforts should be made to provide a real learning outcome basis for qualifications, and to allow the above concept to penetrate into all forms and levels of education and training. Potential advantages in the framework have to be maximized both in the systems of education and training (by conveying contents through the learning outcomes toward the curricula and for determining the assessment standards) and in the world of work and economy (transparency of qualifications, relationship with the world of work, HR).”*<sup>48</sup>

In accordance with LLL framework strategy, the operational programme document of the educational investments to be implemented from the EU supports between 2014 and 2020, the HRDOP Priority axis 3 identifies the further development of the HuQF as a measure. *“Taking actions to support lifelong learning, implementing system building to encourage participation, in particular further developing the HuQF as needed, linking of qualifications obtainable in non-formal training, improving validation, as a result of which knowledge contents obtainable in non-formal and informal learning become recognisable through formal learning. Hungary undertook to elaborate a national validation system by 2018, and based on the experience and results of the projects in the previous programming period it is necessary to elaborate a comprehensive “national” recognition model, based on which the structured system of knowledge recognition, operated within the institutional and legal system of the national education and training, being in compliance with the European norms can be established.”* Concrete operative planning in compliance with the development aim has not been started yet.

## 8.2. Dilemmas in the mirror of stakeholders' opinions

We have conducted an empirical research for the Country Report to the NQF-In project, and for identifying further directions of the implementation and development of the HuQF. Within the

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<sup>46</sup> No. 1304/2013/EU Regulation of the European Parliament and Council (on 17 December 2013) on the European Social Fund and repealing no. 1081/2006/EC Regulation.

<sup>47</sup> No. 1791/2013. (XI. 7.) Government Decision on the tasks related to the introduction of the HuQF, and on the amendment of the no. 1229/2012. (VII. 6.) Government Decision on the amendment of the no. 1004/2011. (I. 4.) Government Decision on the establishment and introduction of the NQF

<sup>48</sup> National framework strategy for the policy of lifelong learning for the period between 2014 and 2020, page 95.

frame of the empirical research, 80 semi-structured deep interviews were prepared with training providers, training policy experts, sectoral participants, employers and HR participants, etc.

The study conducted with the interviews also seems to underpin the assumption that linking to the framework is not the single or the most important tool to get information on the preparedness and suitability of labour force for the employers either. Several alternative tools that have been used for a long time are available, which also have to be kept in mind when introducing the framework and arguing for its usefulness.

The dilemma emerged whether qualifications obtainable in the formal training system and the certificates obtainable in the non-formal training should be included in a single and uniform framework. The certificates issued under different names could be included in a single, uniform framework if the Hungarian training system would work on a credit basis as well, however, in the lack of this the level indicating number alone could only be confusing information. Therefore, the advantages and disadvantages of the (internal) duplication or definite separation of the qualifications framework need to be considered. In a part of the interviews the approach also emerged that the sector-level typical expectations of a special field could be much more easily interpreted, and they could serve as a more functional reference for the participants in the concerned sector than the competence expectations described in the national framework, sometimes worded in a very general form.

Based on the information collected so far, it is not clear how the operators of closed training markets (e.g. internal in-company trainings) are interested in the standard documenting of the activity performed by them, or in the linking of the certificates issued by them to the qualifications framework. There is a significant difference among the sectors regarding whether they need certifying of knowledge based on separate systems. The health sector has extremely strict qualification expectations, requirements, contrary to this, in the IT sector it is a widely known slogan that “paper doesn’t matter” (however, these participants also rely on the socialisation process in the school system, as well as on the development of learning skills). Most companies use their own methods to determine to what extent an applicant is or will be suitable for filling a scope of work, performing the tasks related to the scope of work, and working for company interests (by having the applicants perform professional tasks, using the institution of probation period, etc.) The study conducted with the interviews showed that formal educational attainments, qualifications, and relative to this, the documents certifying the preparedness played a very minor role in everyday practice.

The option offered by the framework to consider training within the school system as a reference is rather worrying as training programmes provided in the non-formal sector cannot be measured to these, they are not equivalent. This approach would be only suitable for identifying input requirements. Assessment elements do not appear in type B i.e. non-formal VPRs, each training provider prepares assessment as per their requests, i.e. programme requirements are only verbal as they are not connected to clear assessment requirements to provide a basis for issuing the certifying document. It becomes necessary to establish a procedure being different from the existing one within the linking mechanism of the HuQF for formal qualifications, which is adapted to the characteristics of the non-formal training sector in its detailed requirements. (Naturally



outcome descriptions, competence requirement descriptions as references, derived from or comparable to the HuQF or intermediary or sectoral level descriptions are required.)

### **8.2.1. Is the framework suitable for planning individual learning paths?**

It is an often cited argument for using the qualifications framework that it allows the individual to plan and overview his or her own training path. Considering the hierarchic characteristics of this, it should be noted that in the case of several trainings, when it is possible to step to a higher level, the framework does not express extra knowledge or extra competence. The master craftsman examination meaning a higher professional level compared to the NVQR level, or the obtainment of the master title cannot get onto a higher level of hierarchy as the NVQR and the master level built on it are at the same level of the HuQF. Those already having a degree have the opportunity of participating in post-graduate specialisation trainings where they can get deeper knowledge; however, this does not mean getting to a higher level, either. Similarly, obtaining several vocational qualifications does not mean a higher hierarchic level though this is a great advantage in the labour market today and it is an important step in forming life strategy for learning (which is also a problem for statistical analyses dealing with the qualification levels of the population). This means there is an important extra outcome, a richer composition of competences, which is not reflected in the framework for the individual. At the same time, the framework does not “indicate” at all major competence extensions such as learning a foreign language. It would be more practical to put emphasis on compiling an own portfolio, and find the way to somehow relate this to the operation and levels of the framework.

### **8.2.2. Usable alternative solutions**

At the beginning of the empirical study, the baseline was that some functionalities of aligning non-formal certificates to the framework, or linking them to it can be identifiable. Among these it was emphasized that employers should get reliable information on the professional knowledge, skills, attitudes and autonomy of the holder of the certificate from the level number in the certificate (which indicates which level of the framework the person was linked to, i.e. which level of competence expectations the person complies with), provided that the concerned employer knows the levelling logic of the framework, as well as the description and levelling of the employer’s own country for similar qualifications.

It should be also noted that the given number does not indicate the level of individual’s knowledge but the linking level of the obtained qualification, which can be expected of the holder of the certificate, certifying document or qualification, however, it does not give a full guarantee at all for the person actually having the expected knowledge. Revealing interviews provided a lot of information about the opinion of each target group in the operation of the framework on such a solution. Naturally, the limited number of interviews does not allow referring to the majority opinion; therefore, we only list the arguments that have emerged so far:

- Some argued that learning and understanding such a complex system is a too difficult task for employers, who think that the methods used by them (test task, interview etc.) are more reliable and can be used routinely.

- Representatives from the IT sector argued that professional knowledge quickly changes, emphasizing that by the time the qualification has been linked and understood by everyone, it is not valid any more.

### **8.2.3. Duplication of the framework**

The question is how the two different qualities of the formal and non-formal sector qualifications' specificities can be represented in a single system in a way that the original aims (reference, information) are not damaged. For training experts, no matter to what extent they can accept and follow the learning outcome-based approach, the length of training remains very important information. A short (e.g. one-day 10-hour) programme can only include a part or fraction of the requirements that are described at the concerned level of the framework. However, if the training providers offering non-formal trainings still describe their outcome results in the form of learning outcomes, due to the programme periods it is usually less realistic, moreover, due to the declared aims of the training, it is less probable that there is sufficient information displayed in all the four descriptor columns for evaluation. Non-formal training programmes are usually relatively short and they focus on the development of a low number of competences, and they almost never make any efforts to form the elements listed under the attitude and autonomy descriptors.

If, logically, fewer learning outcome expectations belong to a relatively short training, the question is how these are compared to the expectations described in the qualifications framework. A qualification to be linked has to meet all requirements described at the given level of the framework, or there has to be an expected learning outcome that is included in the concerned level of the framework.

However, if both learning programmes get an identical level indicating number, this practically gives false information to employers being the target audience from the aspect of using the framework.

Including qualifications obtainable in non-formal training programmes in the framework inevitably leads to the duplication of the system, by linking elements generated by two different mechanisms to a single system. This means the internal disintegration or duplication of the framework only makes the above duality explicit. Namely, as there is no credit-based training system available, there is no tool for arranging the characteristics of the different programmes in a common interpretation framework.

#### **8.2.4. “Intermediary”, sectoral level of the framework**

A serious obstacle to linking competence certifying document issued in the non-formal training sector is usually that there is no detailed description available as in the case of formal (school) qualifications (where this is made compulsory by the legal regulation). Anyway, if there is still such a description, it is usually a text not worded in learning outcomes, i.e. it can be compared with difficulty or it cannot be compared at all. The competence expectations described in the national framework shall be valid and interpretable for all qualifications to be linked. Due to this, however, expectations, competence descriptions become too general. They are too far from the concrete competence requirements for the representatives a trade.

Qualifications framework does not or cannot only have an informative function. Its additional functions, i.e. creating transparency, may be similarly important and not only at a system level but for a certain sector as well. The framework as a form (genre) may offer an organising principle for a special field or within this for a sector. However, this needs the elaboration of frameworks by the so called economic sub-sectors, which can properly provide this function if the widest possible range of professional participants is involved. Sectoral approach is not uncommon e.g. for the so called international qualifications, or for the trades originally working in the global market such as IT, transportation, bank-financial services. For the further development and use of the framework as a tool it would be needed to initiate and support the establishment of sectoral frameworks with a pilot nature.

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## About the authors

### **Zoltán Loboda**

Zoltán Loboda has spent almost fifteen years of experience in senior and leaders position in policy domains of the Ministry of Education covering EU affairs, international relations and strategic planning of European Social Fund, policy information provision to international organisations and coordinating comparative analysis.

His main policy responsibilities were addressed to: prepare governmental education positions in decision-making process of the EU and other international organisations; prepare and coordinate strategic planning for European Social Fund Programs between 2004-2006; coordinate Hungarian participation in different OECD thematic programs and comparative analysis; compile and prepare the drafting of LLL Strategy for Hungary (2005 – 2013) and management of the whole process until Government adoption and monitoring of its implementation; redraft a new Government Lifelong Strategy in accordance with the EU ESF ex-ante criteria for the period 2014-2020; lead the conceptual and operational work for elaboration of Hungarian Qualification Framework; take part in the strategic Task Force commissioned to draw up a strategy Against Early School Leaving.

During the Hungarian Presidency of the European Union, he chaired the EU Education Committee, managed the implementation of the Presidency program and the preparation of Council dossiers in the field of education including negotiation on legal texts with Member States and Commission and the preparation of policy related professional content for Council meetings and professional events. Zoltan Loboda now is working for the Educational Authority and responsible for managing international projects, taking part in EQF implementation and HuQF developments.

### **Erzsébet Szlamka**

Erzsébet Szlamka worked for the National Institute of Vocational and Adult Education, where she gained knowledge on the National Vocational Qualifications Register, module system and regulations related to vocational education and training. Then, in the Ministry of Human Capacities, she became the member of the EQF Advisory Group and NCP, she also organised the Hungarian EU Presidency conference on EQF. She now works for the Educational Authority as a qualifications framework expert and Head of Unit for International Relations. Erzsébet Szlamka is a member of the team developing the Hungarian Qualifications Framework, where she is responsible for international cooperation and the management of NQF-related projects, including the coordination of the NCP. She is still a member of the EQF Advisory Group, where she was responsible for the presentation of the Hungarian Referencing Report; she also participated in the Polish referencing process as an international expert. She has extensive

expertise on qualifications systems, qualifications frameworks, lifelong learning policy tools, experience in dissemination (organized several conferences, roundtable discussions, PLAs).

### **Éva Tót**

Ms. Éva TÓT (PhD) sociologist, researcher. She has more than 35 years of research and policy analysis experience. Until 2007 as a research fellow in the background institute of the Ministry of Education she conducted several research projects on informal learning, non-formal training market and LLL strategies. Besides she participated in several international research cooperation programs (as national coordinator for AMPHOR project on adult education system, expert in IWL project of ETF on work-based learning, national expert in Q4EU etc.). In 2005-2006 she organized field research on the work-related informal learning. She has written several expert papers for international organizations (ILO, ETF, OECD) and regularly participates in preparation of country reports (for Eurydice project on adult education and training, for OECD on recognition of prior learning and for European Inventory on validation on informal learning). Between 1997-2009 she participated as national delegate in the work of the OECD INES Network B (Social outcomes of learning). Recently she participated in the project for development of the national scheme for recognition of prior learning in HE. She has published more than 60 articles in academic journals and reviews.

## Annex 1. List of legal acts/regulations referred to in country report

### Legal acts for the HuQF

- Act LXXVII of 2013 on adult training
- Act CXXI of 1999 on economic chambers
- Act CCIV of 2011 on national higher education
- Act CLXXXVII of 2011 on VET
- Act CXC of 2011 on general education
- Act CLV of 2011 on vocational training contribution and on the support of the development of training
- No. 16/2014 (IV.4.) NGM Decree of the Ministry for National Economy on the requirements of registration and rules of procedure for adult training LPRs, and on the certification of meeting the requirements of language training
- No. 10/2010. (IV. 15.) SZMM Decree of the Ministry of Social Affairs and Labour on the detailed rules of adult training expert activity
- No. 8/2013. (III.6.) NGM Decree of the Ministry for National Economy on the requirements of master craftsman examination for the qualifications belonging to the competence of the Minister of National Economy
- No. 47/2014. (X. 29.) EMMI Decree of the Ministry of Human Capacities on the requirements of master craftsman examination for the qualifications belonging to the competence of the Minister of Human Capacities
- No. 31/1996. (VI. 19.) IKM Decree of the Ministry of Industry and Commerce on the VERs of industrial master craftsman training
- No. 27/1996. (X. 4.) FM Decree of the Ministry of Agriculture on issuing the VERs of the master craftsman training that can be added on the qualifications belonging to the sector of agriculture
- No. 53/2013. (IX. 11.) BM Decree of the Ministry of Interior on the requirements of master craftsman examination for the trade of a chimneyman belonging to the sector of the Minister of Interior
- No. 21/1997. (VI. 4.) MKM-IKIM Joint Decree of the Ministry of Culture and Education-Ministry of Industry, Trade and Tourism on the master craftsman training that can be provided in the trades of a goldsmith, musical instrument maker and repairer
- No. 1/2000. (I. 14.) NKÖM Decree of the Ministry of National Cultural Heritage on the organised training system of cultural experts, its requirements, and its financing
- No. 63/2011. (XI. 29.) NEFMI Decree of the Ministry of Human Capacities on the rules of in-service training for skilled health workers
- No. 273/2012. (IX. 28.) Government Decree on the in-service training of civil servants
- Act CLV of 1997 on consumer protection

- No. 58/2013. (XII.13.) NGM Decree of the Ministry for National Economy on the adult training quality assurance framework, and on the members, tasks, and detailed rules of operation of the Adult Training Expert Committee
- No. 14/2014 (IV.4.) NGM Decree of the Ministry for National Economy on the requirements and order of procedure of including adult training LPRs in the register, and on certifying the fulfilment of language training
- No. 59/2013. (XII. 13.) NGM Decree of the Ministry for National Economy on the requirements and order of procedure of including adult training VPRs in the register, and on certifying the obtainment of a vocational qualification
- No. 217/2012. (VIII. 9.) Government Decree on the modules of vocational requirements of state recognised qualifications
- No. 56/2013 (XII.4.) NGM Decree of the Ministry for National Economy on the extent of the administrative service fee to be paid in the authorisation procedure for providing adult training activity, and the rules of use, as well as the order of payment of the penalties imposed during the control of adult training institutions

#### Legal regulations for the HuQF

- No. 2069/2008. (VI. 6.) Government Decision on joining the European Qualifications Framework and on the establishment of the National Qualifications Framework
- No. 1004/2011. (I. 14.) Government Decision on the establishment and introduction of the NQF
- No. 1229/2012. (VII. 6.) Government Decision on the tasks related to the introduction of the HuQF, and on the amendment of the no. 1004/2011. (I. 4.) Government Decision on the establishment and introduction of the NQF
- No. 1791/2013. (XI. 7.) Government Decision on the tasks related to the introduction of the HuQF, and on the amendment of the no. 1229/2012. (VII. 6.) Government Decision on the amendment of the no. 1004/2011. (I. 4.) Government Decision on the establishment and introduction of the NQF



## Annex 2. Forms used in the procedure of including qualifications in the NQF

### Form of Vocational Programme Requirement (VPR) Proposal

#### PROPOSER'S DATA

|                                    |  |
|------------------------------------|--|
| TAX NUMBER                         |  |
| NAME                               |  |
| <i>COMPANY FORM</i>                |  |
| <i>PROPOSER'S POSITION</i>         |  |
| ZIP CODE                           |  |
| CITY                               |  |
| PUBLIC AREA,<br>HOUSE NUMBER       |  |
| <i>COUNTY</i>                      |  |
| REPRESENTATIVE'S NAME              |  |
| REPRESENTATIVE'S PHONE NUMBER      |  |
| REPRESENTATIVE'S<br>E-MAIL ADDRESS |  |
| CONTACT PERSON'S NAME              |  |
| CONTACT PERSON'S PHONE NUMBER      |  |
| CONTACT PERSON'S<br>E-MAIL ADDRESS |  |

#### 1. A) NAME OF VPR

|  |
|--|
|  |
|--|

#### B) NAME OF VOCATIONAL QUALIFICATION

|  |
|--|
|  |
|--|

2. WITH THE COMPETENCES THAT CAN BE ACQUIRED BY MEANS OF THE VOCATIONAL QUALIFICATION
- ☐ A NEW, INDEPENDENT ACTIVITY, TASK IN THE FIELD OF WORK CAN BE PERFORMED
- ☐ AN ACTIVITY, TASK IN THE FIELD OF WORK CAN BE PERFORMED AT A HIGHER LEVEL
3. IS THE VPR MODULAR?
- ☐ YES
- ☐ NO

#### THE VPR MODULE

- ☐ IS A MODULE INCLUDED IN THE REGISTER
- ☐ IS A NEW MODULE ELABORATED BY THE PROPOSER

| <i>VPR<br/>MODULE<br/>NUMBER</i> | <i>MODULE NAME</i> |
|----------------------------------|--------------------|
| 01.                              |                    |
| 02.                              |                    |
| 03.                              |                    |

4. THE VPR CAN BE LINKED TO THIS TRADE GROUP IN THE NVQR
- |   |  |
|---|--|
| <input type="checkbox"/> 1. HEALTH CARE                             | <input type="checkbox"/> 12. PRINTING INDUSTRY                             |
| <input type="checkbox"/> 2. SOCIAL SERVICES                         | <input type="checkbox"/> 13. TRAFFIC INDUSTRY                              |
| <input type="checkbox"/> 3. EDUCATION                               | <input type="checkbox"/> 14. ENVIRONMENTAL PROTECTION AND WATER MANAGEMENT |
| <input type="checkbox"/> 4. ART, PUBLIC EDUCATION, COMMUNICATION    | <input type="checkbox"/> 15. ECONOMY                                       |
| <input type="checkbox"/> 5. ENGINEERING                             | <input type="checkbox"/> 16. MANAGEMENT                                    |
| <input type="checkbox"/> 6. ELECTRICAL AND ELECTRONICAL ENGINEERING | <input type="checkbox"/> 17. TRADE AND MARKETING, BUSINESS ADMINISTRATION  |
| <input type="checkbox"/> 7. INFORMATION TECHNOLOGY                  | <input type="checkbox"/> 18. CATERING AND TOURISM                          |
| <input type="checkbox"/> 8. CHEMICAL INDUSTRY                       | <input type="checkbox"/> 19. OTHER SERVICES                                |
| <input type="checkbox"/> 9. ARCHITECTURE                            | <input type="checkbox"/> 20. AGRICULTURE                                   |
| <input type="checkbox"/> 10. LIGHT INDUSTRY                         | <input type="checkbox"/> 21. FOOD INDUSTRY                                 |
| <input type="checkbox"/> 11. TIMBER INDUSTRY                        | <input type="checkbox"/> 22. PUBLIC SERVICE                                |
5. DETERMINATION AND INDICATION OF THE LEVEL FOR LINKING ACCORDING TO THE HUQF RELATED TO THE EQF
- ☐ 1. PRIMARY SCHOOL, GRADE 6
- ☐ 2. PRIMARY SCHOOL, GRADE 8
- ☐ 3. SECONDARY SCHOOL, GRADE 10
- ☐ 4. CERTIFICATE OF SECONDARY SCHOOL LEAVING EXAMINATION
- ☐ 5. HIGHER VET
- ☐ 6. HIGHER EDUCATION BACHELOR PROGRAMME
- ☐ 7. HIGHER EDUCATION MASTER PROGRAMME
- ☐ 8. DOCTORAL PROGRAMME

6. INPUT REQUIREMENTS FOR STARTING THE TRAINING, DEPENDING ON THE TYPE OF VOCATIONAL QUALIFICATION

PRELIMINARY SCHOOL QUALIFICATIONS

- ☐ NOT BOUND TO ANY SCHOOL QUALIFICATION, LOWER THAN COMPLETED 8 GRADES OF PRIMARY GENERAL EDUCATION
- ☐ COMPLETED PRIMARY GENERAL EDUCATION
- ☐ SECONDARY SCHOOL LEAVING CERTIFICATE
- ☐ CERTIFICATE OF SECONDARY SCHOOL LEAVING EXAMINATION
- ☐ SECONDARY VOCATIONAL SCHOOL LEAVING EXAMINATION
- ☐ HIGHER EDUCATION DEGREE

PRELIMINARY VOCATIONAL QUALIFICATION

- ☐ NOT BOUND TO ANY PRELIMINARY VOCATIONAL QUALIFICATION
- ☐ VOCATIONAL QUALIFICATION(S) OBTAINED IN OTHER VOCATIONAL TRAINING ACCORDING TO THE ADULT TRAINING ACT, THAT IS:

- ☐ QUALIFICATION(S) IN THE PROPOSAL BELONGING TO THE TRADE GROUP IN THE NVQR, THAT IS:

- ☐ QUALIFICATION(S) OBTAINED IN HIGHER VET NOT PROVIDING THE LEVEL OF A HIGHER EDUCATION QUALIFICATION ACCORDING TO THE ACT ON NATIONAL HIGHER EDUCATION, THAT IS:

- ☐ POSTGRADUATE SPECIALISATION QUALIFICATION(S), THAT IS:

HEALTH APTITUDE REQUIREMENTS

- ☐ NOT REQUIRED
- ☐ REQUIRED, THAT IS:

REQUIRED PRACTICE TIME

- ☐ NOT REQUIRED
- ☐ REQUIRED, THAT IS:

OTHER REQUIREMENTS

- ☐ NOT REQUIRED
- ☐ REQUIRED, THAT IS:

|  |
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|  |
|--|

**7. BRIEF DESCRIPTION OF THE MOST TYPICAL ACTIVITY/FIELD OF WORK THAT CAN BE PERFORMED/FILLED WITH THE VOCATIONAL QUALIFICATION**

|  |
|--|
|  |
|--|

**8. NAME AND CLASS OF SCOPE OF WORK THAT CAN BE FILLED WITH THE VOCATIONAL QUALIFICATION**

| NAME OF HSCO<br>MAIN GROUP | HSCO NUMBER | NAME OF<br>OCCUPATION | THE MOST TYPICAL<br>ACTIVITY/FIELD OF<br>WORK THAT CAN BE<br>PERFORMED/FILLED<br>WITH THE<br>VOCATIONAL<br>QUALIFICATION |
|----------------------------|-------------|-----------------------|--|
|                            | ----        |                       |  |

**9. MINIMUM AND MAXIMUM TOTAL NUMBER OF TRAINING HOURS OF THE TRAINING REQUIRED FOR OBTAINING THE VOCATIONAL QUALIFICATION DEPENDING ON THE TRAINING FORM, AND THE RATIO OF THEORETICAL AND PRACTICAL TIME**

**CAN THE TRAINING BE IMPLEMENTED IN THE TRAINING FORM OF „INDIVIDUAL PREPARATION“?**

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b>INDIVIDUAL PREPARATION</b>                  | MINIMUM | MAXIMUM |
|--|---------|---------|
| TOTAL NUMBER OF TRAINING HOURS OF THE TRAINING |         |         |
| RATIO OF THEORETICAL TRAINING TIME (%)         |         |         |

|                                      |  |
|--------------------------------------|--|
| RATIO OF PRACTICAL TRAINING TIME (%) |  |
|--------------------------------------|--|

**CAN THE TRAINING BE IMPLEMENTED IN THE FORM OF „GROUP TRAINING“?**

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b>GROUP TRAINING</b>                  | MINIMUM | MAXIMUM |
|--|---------|---------|
| TOTAL NUMBER OF TRAINING HOURS         |         |         |
| RATIO OF THEORETICAL TRAINING TIME (%) |         |         |
| RATIO OF PRACTICAL TRAINING TIME (%)   |         |         |

**CAN THE TRAINING BE IMPLEMENTED IN THE FORM OF „DISTANCE TRAINING“?**

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b>DISTANCE LEARNING</b>               | MINIMUM | MAXIMUM |
|--|---------|---------|
| TOTAL NUMBER OF TRAINING HOURS         |         |         |
| RATIO OF THEORETICAL TRAINING TIME (%) |         |         |
| RATIO OF PRACTICAL TRAINING TIME (%)   |         |         |

**10. LABOUR MARKET RELEVANCE OF THE PLANNED TRAINING**

|  |
|--|
|  |
|--|

## 11. CRITERIA OF ISSUING THE DOCUMENT TO CERTIFY THE OBTAINMENT OF THE VOCATIONAL QUALIFICATION

1. PARTICIPATION IN AT LEAST SEVENTY PERCENT OF THE NUMBER OF TRAINING HOURS AS STATED IN THE ADULT TRAINING AGREEMENT, AND
2. SUCCESSFUL COMPLETION OF THE FINAL VOCATIONAL REPORT

### 3.1.DETAILED DESCRIPTION OF THE VPR MODULE

|                      |  |
|----------------------|--|
| NUMBER OF VPR MODULE |  |
| NAME OF VPR MODULE   |  |

#### 3.1.1. MINIMUM AND MAXIMUM NUMBER OF TRAINING HOURS OF THE TRAINING DEPENDING ON THE TRAINING FORM, AND THE RATIO OF THEORETICAL AND PRACTICAL TIME

CAN THE MODULE BE IMPLEMENTED IN THE TRAINING FORM OF „INDIVIDUAL PREPARATION“?

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b>INDIVIDUAL PREPARATION</b>          | MINIMUM | MAXIMUM |
|--|---------|---------|
| NUMBER OF TRAINING HOURS               |         |         |
| RATIO OF THEORETICAL TRAINING TIME (%) |         |         |
| RATIO OF PRACTICAL TRAINING TIME (%)   |         |         |

CAN THE MODULE BE IMPLEMENTED IN THE TRAINING FORM OF „GROUP TRAINING“?

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b>GROUP TRAINING</b>                  | MINIMUM | MAXIMUM |
|--|---------|---------|
| NUMBER OF TRAINING HOURS               |         |         |
| RATIO OF THEORETICAL TRAINING TIME (%) |         |         |
| RATIO OF PRACTICAL TRAINING TIME (%)   |         |         |

**CAN THE MODULE BE IMPLEMENTED IN THE TRAINING FORM OF „DISTANCE LEARNING”?**

- ☐ YES  
☐ NO  
☐ NOT RELEVANT

IF YES:

| <b><i>DISTANCE LEARNING</i></b>        | <b>MINIMUM</b> | <b>MAXIMUM</b> |
|--|----------------|----------------|
| NUMBER OF TRAINING HOURS               |                |                |
| RATIO OF THEORETICAL TRAINING TIME (%) |                |                |
| RATIO OF PRACTICAL TRAINING TIME (%)   |                |                |

### **3.1.2 DESCRIPTION OF VOCATIONAL REQUIREMENTS**

DESCRIPTION OF THE VOCATIONAL KNOWLEDGE, SKILLS AND INDIVIDUAL COMPETENCES, SOCIAL COMPETENCES AND METHOD COMPETENCES DESCRIBING THE VOCATIONAL COMPETENCES REQUIRED FOR PERFORMING/FILLING THE MOST TYPICAL ACTIVITY/FIELD OF WORK ACCORDING TO LEARNING OUTCOMES

| <b>KNOWLEDGE</b> | <b>SKILLS</b> | <b>ATTITUDE</b> | <b>RESPONSIBILITY, AUTONOMY</b> |
|------------------|---------------|-----------------|---------------------------------|
|                  |               |                 |                                 |
|                  |               |                 |                                 |

## Annex 3. The process of including adult training VPR in the register

