





InTheLoop4VET

O4 - T4 Development of recommendations for policy makers and regulatory authorities for facilitating the uptake of project results

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Introduction

The project Mission

InTheLoop4VET sets out to develop a framework and tools for the operationalisation of a feedback loop involving graduate data collection, data processing and adaptation to constantly shifting labour market environment by VET providers themselves.

This objective is driven by the need for VET providers to strengthen their capacities for independent self-adaptation (effectively exploiting advantages of flexibility, local market intelligence, proximity to communities), through efficient graduate data handling and processing, within processes of alignment with labour and other market needs. Simultaneously, the project adopts an integrated approach aiming to promote harmonization of such feedback loop practices and resources across VET contexts and the development of international standards, data sharing, co-processing and transparency in implementing them.

InTheLoop4VET forms a partnership of leading institutions in the field of vocational education, and research to meet the objective of increasing the involvement of VET providers in feedback loop design, development and implementation. The partnership is composed by three VET providers — Folksuniversitetet (SE), Ernestas Galvanauskas (LT), CIPFP Valle de Elda (ES), an EU-wide association representing VET providers (EVBB, DE) and a research organisation with cross-sectoral research expertise (PROMEA, GR). Bringing in a diversity of capacities and organizational experience,

InTheLoop4VET project encompasses capacity development activities on graduate data generation and use, institutional adaptation, development of digital feedback loop supporting tools and networking for data sharing and interoperability of feedback loops. The methodological approach is modular in design in addressing distinct stages required for setting up a feedback loop mechanism at VET provider level, based on generating and using graduate tracking data and market intelligence in a targeted and combined provision adaptation approach.

The approach is bottom up in valorizing the potential of micro-reforms implemented independently by VET providers with increased data handling skills for responding to market needs and aligning its provision means and content accordingly.

The consolidation of the InTheLoop4VET framework in complementarity to existing EU-wide QA frameworks and arrangements will bring added value derived from the empowerment of VET providers in the relevant decision-making processes and consultations. The dissemination of the InTheLoop4VET framework and tools – developed as context-specific and amenable to harmonisation at the transnational level – is foreseen to be impactful for the majority of VET schools beyond the partnership countries, increasing their flexibility, competition-drive and synergistic profile in effecting adaptation to evolving socio-economic needs. Finally, through the non-proprietary digital resources that the project is going to make available, we facilitate the establishment of common reporting standards and sustainable outlets for sharing tracking and adaptation data.





The project objectives:

- Increasing engagement of VET providers in the establishment and implementation of feedback loops
- Building VET providers' capacities for generating & collecting graduate tracking data
- Improving VET providers' uses of tracking data for provision adaptation purposes
- increasing graduate data sharing rates and comparability of VET graduates' data

The project targets:

- VET providers
- Associations of VET providers
- VET quality assurance authorities and Policy-Makers





1. The state of Graduate Tracking Systems (GTS) in European Union

A. Why is GTS important?

- According to CEDEFOP: "A better understanding of the performance of VET graduates in the labour market is one of the key sources for assessing and improving the quality and labour market relevance of VET, alongside forecasts of skills supply and demand"
- COUNCIL RECOMMENDATION of 20 November 2017 on tracking graduates: "Member States should improve the availability and quality of data about the activities of graduates, that should be compatible and available for comparison to all EU member states, in an anonymized way through graduate surveys at education system and, where appropriate, institutional level"
- Recommendations of expert group, DG EAC, 2021: "High-quality data on the pathways of higher education and vocational education and training (VET) graduates after they finish their studies enable policy-makers and educational institutions to improve future teaching and learning outcomes, the employability of graduates, tackle skills gaps and mismatches, and ensure social inclusion in education."

B. Types of feedback mechanisms in Europe

Liberal, Statist, Participatory, Coordinated co-exist in each EU country (source: CEDEFOP):

- **Liberal,** characterised by a *low degree of coordination*, where feedback between VET providers and the labour market is mainly regulated through the market (IE)
- **Statist,** characterised by *strong state regulation* of education and weak links between education and labour market in terms of communication **(BG, EE, PL)**
- Participatory, which allows for the *participation of social partners* in the processes, but mainly in a consultative role (Es, Fr, Hu, Fl)
- Coordinated, where *social partners are the drivers* of renewal processes and play an active role in its implementation (DK, NL, De)





2. The Memorandum of Understanding to build the VET Adopters

Since 2019, InTheLoop4VET project has managed to tackle most of those challenges through the development of a framework and tools for the operationalisation of a feedback loop involving graduate data collection, data processing and adaptation to constantly shifting labour market environment by VET providers themselves. It also succeeded to develop an integrated approach aiming to promote harmonisation of such feedback loop practices and resources across VET contexts and the development of international standards, data sharing, co-processing and transparency in implementing them.

To achieve this last part of the project's objectives, a network of InTheLoop4VET adopters (O4 - T1) was created through the signature of a Memorandum of Understanding (annex).

This network is mainly comprised - to this date - by more than 20 important European VET providers who share a common vision and willingness to improve VET Providers' Uses of Graduate Tracking feedback – based on the principles of protection of personal data, common interest, reciprocity, and complementarity.

Among the various activities listed in the MoU that the signatories agreed to, we can find this one that is probably the most important one to ensure the lasting impact of the InLoop4VET project: "Vocal advocacy vis-à-vis policy makers to increase and improve the use of VET Graduates tracking Systems."

This document aims to provide the network with a **recommendations paper** for policy makers and regulatory authorities for facilitating the uptake of project results. Its main rationale is to persuade policy makers regarding the benefits of small-scale institutional amendments, the high value of graduate tracking data collection and uses, and the need for harmonised tracking measures (data sharing & comparability).

3. The Policy Recommendations Paper

A. The need of a Policy Recommendations Paper

As we saw through the entire development and implementation of the "InTheLoop4VET" project, it is obvious that tracking the destinations of VET graduates is one of, if not the, most efficient method to provide crucial intelligence on the quality of learning programmes in higher and vocational education and training and the extent to which they meet labour market needs.

The ability to track VET graduates is also considered a core component of effective Quality Assurance systems as it provides a mechanism for gathering intelligence on skills utilisation in the labour market and placement rates. This is recommended in both the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), the European Quality Assurance Framework for Vocational Education and Training (EQAVET) and reinforced by the European Framework for Quality and Effective Apprenticeships.

The current challenges facing the efficient implementation of Graduate Tracking Feedback loop mechanisms for monitoring and improving the efficiency of vocational education and training (VET) provision are the following:

- **Non compatible data sets:** Since there is not a standardized approach for the implementation of VET Graduate Tracking systems, the information derived is complex and its value for comparison between institutions or at national / EU level is likely to be limited.





- **Poor tracking approaches:** Over-surveying or poor surveying, lack of timelapse, poor analysis, random use of tracking results, provide limited use or comparison of results.
- Lack of use of tracking results: Tracking results are sometimes not used, e.g. due to insufficient resources at institutional level or due to national regulations (i.e. GDPR).
- **GDPR:** Tracking systems should take into serious consideration and respect Data Privacy. Ethical considerations have to be made, while the anonymization of the data collected has to be ensured.
- Costs: Development of VET Graduate Tracking systems has to take into account the availability of funds and resources that are necessary for the implementation and sustainability of the VET Graduate Tracking actions

B. Definition of a Policy Recommendation paper

A policy recommendation paper is a written document with policy advices prepared for some group or person that has the authority to make or to influence policy decisions, whether that is a minister, a member of parliament, a local authority, parliamentary committee or other public body. Policy recommendations serve to inform people who are faced with policy choices on particular issues about how research and evidence can help to make the best decisions. It is about using research to solve a public policy problem or to provide evidence about how a policy is working. Getting a recommendation accepted by policymakers depends on many factors but a recommendation which is based on strong evidence, is cost effective to implement and takes account of international best practice has a better chance of being accepted and influencing policy debates.

C. The importance of a policy recommendation paper

Communicating research findings is a crucial part of maximising the beneficial impact on society, the economy and individual lives. Academic researchers should write policy recommendations based on their research so that people in positions of influence can use the findings to enact real change to policy and society.

Its objectives are to:

- Promote the collaboration between VET centers and companies and influence policy-making towards initiatives that aim to increase VET provision's supply, quality, and attractiveness by better aligning training content with actual workplace requirements.
- Impact on policy-making for education and training.
- Influence decision-making towards enhancing practical components in VET provision, empowering cooperation between VET providers and employers, and promoting the establishment of skill development policies and strategies.





D. How to efficiently prepare a "policy recommendation paper"?

There is a set of guidelines that can help academics and other researchers for writing policy recommendations based on research, among those we can find:

a. Clearly define the objective:

The first step in crafting a policy recommendation paper is to decide what the objective of the recommendation is.

In our case, the objective is to support and guide national officials to develop or strengthen their measures for tracking their graduates.

b. Determine a target audience

The next step in developing a policy recommendation is to determine the target audience.

Here, we aim to support **national and regional governments** to achieve high standards in undertaking VET graduate tracking.

c. Set out the issue clearly

Having a **clear outline of the existing issue** is highly important to policymakers. It is also important to remember that **academic and technical language should never appear in policy recommendations**. They should be presented in clear, readable, and simple language: easily understandable to any passing reader with no prior knowledge of the subject area. In general, the audience for policy recommendations will not be interested in methodology other than knowing that the findings are robust. The important thing is to prioritise information for policymakers.

d. Fit in with Existing Strategies

A policy recommendation may have a bigger independent impact if it can fit in with an existing strategy, programme for government or legislation. Research is best at influencing policy that is currently in development. A recommendation can influence the development of new policy, in framing recommendations, it is important to be aware of current and future developments in policy in that area.

In our case, it is aligned with the European Council Recommendation of 20 November 2017 on tracking graduates, which stated that Member States should improve the availability and quality of data about the activities of graduates, that should be compatible and available for comparison to all EU member states, in an anonymized way through graduate surveys at education system and, where appropriate, institutional level. It also goes hand in hand with the recommendations of an expert group from the European Directorate-General for Education and Culture (GG EAC) which stated on 2021 that High-quality data on the pathways of higher education and vocational education and training (VET) graduates after they finish their studies enable policy-makers and educational institutions to improve future teaching and learning outcomes, the employability of graduates, tackle skills gaps and mismatches, and ensure social inclusion in education.

e. Show and explain the benefits on society and the importance of action

It is important to write recommendations that present clear arguments as to why the research shows that the recommendation will benefit society, at individual, community and national levels. Also, since Policymakers are faced with a large number of issues which require attention and action, the paper needs to convince them that the issue highlighted by research is important, and the recommended course of action will be beneficial to society in some respect if action is taken.





Conclusion:

Based on this set of rules, desk research, previous projects Outputs findings and achievements, the following policy recommendations paper was drafted and then used by the partnership and shared with the network of InTheLoop4VET adopters to clearly explain to policymakers the current issues surrounding VET Graduates tracking Systems and what needs to be done to improve them and their application at local/national level.

E. The "InTheLoop4VET" Policy Recommendation Paper

Toward an effective national feedback loops and graduate tracking system that enable the timely adaptation of learning provision to evolving labour market needs.

The **2017 Council Recommendation** invited Member States to take steps to ensure the timely, regular and broad dissemination and exploitation of the results of their analysis of data from their graduate tracking systems, with the following objectives:

- Strengthen career guidance for prospective students, current students and graduates.
- Support the design and updating of curricula to improve the acquisition of relevant skills and employability
- Improve skills matching so as to support competitiveness and innovation at the local, regional and national levels, and to resolve skills shortages.
- Plan for and forecast evolving employment, educational and social needs
- Contribute to policy development at both national and EU levels.

But since then, while the implementation of the systems used for the Higher Education (HEIs) Graduates was improving and increasing, that was not the case for the Vocational education and training (VET) Graduates.

Challenges

There are many challenges to implementing an efficient VET Graduates tracking system:

- Non compatible data sets: Since there is not a standardized approach for the implementation of GTS, the information derived is complex and its value for comparison between institutions or at national/EU level is likely to be limited.
- **Poor tracking approaches**: Over-surveying or poor surveying, lack of timelapse, poor analysis, random use of tracking results, provide limited use or comparison of results.
- Lack of use of tracking results: Tracking results are sometimes not used, e.g. due to insufficient resources at institutional level or due to national regulations (i.e. GDPR).
- **GDPR:** Tracking systems should take into serious consideration and respect Data Privacy. Ethical considerations have to be made, while the anonymization of the data collected has to be ensured.
- Costs: Development of VET GTS systems has to take into account the availability of funds and resources that are necessary for the implementation and sustainability of the VET GTS actions





Recommendations for an efficient <u>VET</u> Graduates tracking system

- 1. The VET Graduates Tracking System must be fully in line with the GDPR requirements
- 2. The VET Graduates Tracking System is well promoted to the main VET institutions of the country
- 3. The VET Graduates Tracking System is properly implemented and used by the main VET institutions of the country

4. The VET Graduates Tracking System follows those principles:

- put the students' right to high-quality, inclusive, relevant and efficient education and training at the centre of the tracking process, as set by the first Chapter of the European Pillar of Social Rights, with special focus on the right to quality education, training and lifelong learning and to active support to employment.
- be underpinned by a quality assurance system.
- respect private information in line with the data protection rules and ensure confidentiality for all graduates who are tracked.
- demonstrate clear links with other education policies.
- supplement other sources of intelligence to support the evaluation, planning and governance of complex skills systems.

5. The VET Graduates Tracking System follows those standards:

- contribute to the agreed objectives of the VET system(s).
- aim at covering all initial and continuing VET programmes.
- aim at providing quality data on the full graduate population.
- enable comparative analysis between subgroups of learners.
- use comparison groups.
- be based on multiple measurement points in order to create a longitudinal analysis.
- define the desired quality of the tracking information and use quality assurance to support the graduate tracking system.
- ensure that information from graduate tracking systems is accessible in a form that meets the agreed needs of stakeholders and social partners.
- strengthen cross-border partnerships by including graduates who move to another country following the completion of their programme.
- contribute to EU-level cooperation in VET.





6. The VET Graduates Tracking System collects those <u>ESSENTIAL</u> factual background information from the Graduates:

- Date of birth (month/year)
- Gender
- Country of birth and citizenship
- Country of residence
- Completed degree (possibly with indications of the final grade and field of education)
- Employment status
- Sector and occupation (for those employed)
- Geographical destination of employment
- Basic information on working conditions (full time vs. part time; contract type)
- Educational achievement level of parents
- Information on career progression (job history before present job), including further formal learning after graduation
- International study mobility (i.e. degree and credit mobility of graduates while studying)
- International labour mobility of graduates





Annex – the Memorandum of Understanding





<u>InTheLoop4VET - Memorandum of</u> <u>Understanding:</u>

Joining the Network of Adopters to Improve VET Providers' Uses of Graduate Tracking feedback

This Memorandum of Understanding (MoU) establishes the set of rules concerning the protection of personal data (GDPR) in the use of a digital repository for interactive reporting on the feedback loop mechanism created in the framework of the Erasmus+ project IntheLoop4VET. This MoU also provides the cooperation framework, establishes a communication channel and determining specific working arrangements between the Signatory Parties, who share a common vision and willingness to **improve VET Providers' Uses of Graduate Tracking feedback** – based on the principles of **protection of personal data**, common interest, reciprocity and complementarity.

The MoU was created in the framework of the Erasmus+ Project "InTheLoop4VET", which aims at Improving VET Providers' Uses of Graduate Tracking feedback, as an answer to VET providers' need to strengthen their capacities for independent self-adaptation (effectively exploiting advantages of flexibility, local market intelligence, proximity to communities), through efficient graduate data handling and processing, within processes of alignment with labour and other market needs.

1. Concept

This MoU is conceived in the framework of the Erasmus+ project "InTheLoop4VET" that aims to respond to VET providers' need to strengthen their capacities for independent self-adaptation by improving and spreading the use of Graduate Tracking feedback tools.

InTheLoop4VET research findings revealed that according to the Final Report "Mapping of VET graduate tracking measures in EU Member States" (2018) of the European Commission, there are still four EU Member States that do not have any VET graduate tracking measure (Bulgaria, Cyprus, Greece and Latvia). It is crucial for the viability and impact of VET institutions to have graduate tracking systems in place, to keep their skills provision up-to-date and aligned with the skills needed by the constantly transforming market, in order to ensure high employment rates of their participants – ideally close to 100%. Tracking graduates, knowing their destinations, and getting their feedback on if and how participating in VET courses secured them a place in the job market or helped them move to further education/training is the most efficient and factual method to assess the success of VET curricula and adjust them according to facts and information on skills demand and supply.

In short, the tracking of VET graduates' employment is an important indicator of financing educational institutions, assessing the quality of training in individual institutions, and forecasting the sectors and areas of education that will be in demand in the future.

2. Objectives and scope

While the main goal of the "InTheLoop4VET MoU" is to ensure VET providers to adhere to the Personal Data Protection framework when using the interactive reporting repository of the project, this MoU is





also meant to support and spread the use of Graduate Tracking Feedback loop mechanisms for monitoring and improving the efficiency of vocational education and training (VET) provision, by establishing an EU-wide strategic partnership, which could bring together key actors and stakeholders involved in formal and non-formal education and training provision: from VET providers to Higher Education institutions; from policy makers and public authorities to employers' and workers' associations; from apprentices and students to academic, scientific and technical researchers.

The signatory parties unite in pursuing the following main objectives:

- Supporting regional, national and European initiatives aimed at the development and use of Graduate Tracking Feedback tools and mechanisms.
- Promoting the integration of **Graduate Tracking Feedback methods and tools** in their own premises as well with their collaborators network.

In this way, the InTHeLoop4VET MoU intends to contribute also to the **principles and objectives defined at European level**, as most recently stated in declarations such as the <u>Osnabrück Declaration</u> (2020), which identifies quality VET as an enabler of innovation and recovery and an essential foundation for green, digital and sustainable growth, the <u>Pact for Skills</u> (2020), initiative promoted by the European Commission to upskill and reskill the European workforce, embedded in the European Green Deal, supporting green and digital transitions as well as industrial and SME growth strategies.

- 3. Protection of personal data and the General Data Protection Regulation GDPR (REGULATION (EU) 2016/679)
 - a. Protection of personal data

The right of <u>Protection of personal data</u> as stated in article 8 of the <u>European Charter of Fundamental</u> <u>Rights</u>:

- 1- Everyone has the right to the protection of personal data
- 2- Such data must be processed fairly for specified purposes and on the basis of the consent of the person concerned or some other legitimate basis laid down by law. Everyone has the right of access to data which has been collected concerning him or her, and the right to have it rectified.
- 3- Compliance with these rules shall be subject to control by an independent authority.

The authorities of EU countries are bound to comply with the Charter of fundamental rights only when implementing EU law. Fundamental rights are protected by your country's constitution.

The regulation on the protection of individuals with regard to the processing of personal data by EU institutions established a <u>European data protection supervisor (EDPS)</u>. The EDPS is an independent EU body responsible for monitoring the application of data protection rules within European Institutions and for investigating complaints.

The European Commission has appointed a <u>data protection officer</u> who is responsible for monitoring and the application of data protection rules in European institutions. The data protection officer independently ensures the internal application of data protection rules in cooperation with the European data protection supervisor.





b. The General Data Protection Regulation - GDPR (REGULATION (EU) 2016/679)

The <u>EU REGULATION (EU) 2016/679 of the European Parliament and of the Council</u> on the protection of natural persons with regard to the processing of personal data and on the free movement of such data was adopted on April 27th, 2016 and:

- Lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data.
- Protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.
- The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons with regard to the processing of personal data.

The principles relating to processing of personal data (Article 5 - REGULATION (EU) 2016/679):

Personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purposes ('purpose limitation');
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject ('storage limitation');
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').
- g. The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability').

Read in detail: Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016





4. Legal nature of the MoU

In view of nurturing their cooperation, the signatory parties agree to respect the GDPR regulations while engaging, within their capacities and available resources, in joint areas that encompass, but not limited to, the following (collaboration) activities:

- Contribution to the development of the repository of VET provision adaptation results. The database will be available for use by any registered stakeholder who will thus have access to data reflecting the outcomes (e.g. proposed or implemented changes) of VET providers' self-assessment through tracking and feedback loop mechanisms.
- Widespread dissemination of the Graduate Tracking feedback digital tool of InTheLoop4VET
 with VET Providers to help them improve the tracking of VET graduates' employment is an
 important indicator of financing educational institutions, assessing the quality of training in
 individual institutions, and forecasting the sectors and areas of education that will be in demand
 in the future.
- Active participation in **seminars, conferences and events** addressing topics such as VET graduates' employment and the methods / tools to track efficiently those valuable data.
- Facilitating meetings and matchmaking among signatory parties, to explore possibilities for joint research, actions and projects in the field.
- Mutual exchange of information and knowledge between signatory parties on public and private initiatives aimed at increasing the efficient use of Graduate Tracking Feedback tools and mechanisms.
- Vocal advocacy vis-à-vis policy makers to increase and improve the use of such methods / tools.
- Raising awareness on the societal and economic benefits emanating from the active use of Graduate Tracking Feedback tools and mechanisms.

This MoU is a statement of intent and does not create any enforceable rights or obligations by the Signatory Parties. The Parties are expected to fulfil their tasks under this MoU on a best-effort basis, and based on their available resources. This MoU does not modify or supersede any EU law or any national laws nor does it affect any provisions under other multilateral or bilateral agreements in force and applicable to the Parties.

5. Signatory parties

This Memorandum of Understanding between the InTheLoop4VET partnership and the Signatory Party will enter into force once the Signatory Party signs the present document or submits the form available at this link: https://forms.gle/MtVKwone6eLLLgfCA

Name: Job position / Field of expertise: Organisation: Country:

For the Signatory Party

Signature: