

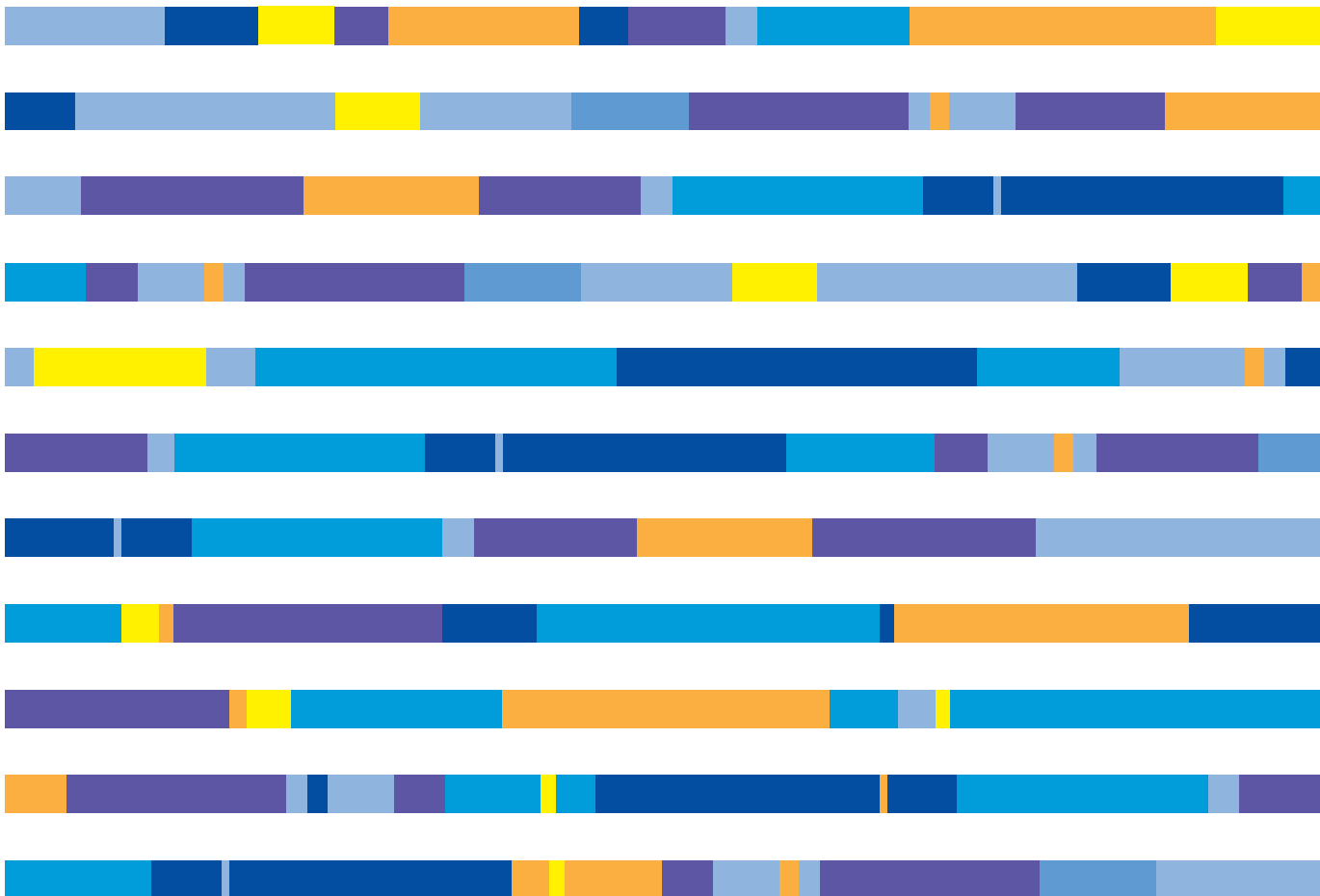


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# European inventory on validation of non-formal and informal learning 2023 update

COUNTRY REPORT:  
**BULGARIA**

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# 1 Abstract

Validation arrangements in Bulgaria have not essentially changed over the last four years i.e., a comprehensive approach covering all sectors of education and also the labour market and the third sector is still missing and validation of non-formal and informal learning (VNFIL) remains to be implemented mostly in the field of VET. There are however some developments under way to conceptualise and pilot a validation mechanism in certain areas in higher education. In the labour market, economically inactive people registered at the Public Employment Service are now allowed to receive financial support to participate in a validation procedure for acquiring a professional qualification or a part thereof. Furthermore, a National Skills Strategy including validation is in the process of being developed. Finally, the National Youth Strategy (2021-2030) defines the promotion of non-formal learning as its first strategic objective.

The take-up of VNFIL in Bulgaria has always been low by international comparison due to insufficient information, knowledge (outreach) of opportunities as well as low interest among prospective candidates. Also, only a few economic sectors regularly use validation e.g.: personal services (hairstylist, beautician), restaurant (baker), real estate (broker). Between 2019 and 2022, some new professions have started using VNFIL, namely, paramedic, technician of renewable energy sources and interpreter from and into Bulgarian sign language.

# 2 Introduction

There have been no significant changes in the implementation of validation arrangements in Bulgaria over the last four years and there is no change to the definition of VNFIL (developed mainly from a VET perspective), according to which, validation is the establishment of equivalence between vocational knowledge, skills and competences (acquired through non-formal or informal learning) with state educational requirements (SERs) related to a specific professional qualification.<sup>1</sup> National stakeholders consulted highlight that there is a need to update the validation procedure, in particular, to make it easier, quicker and less bureaucratic.

One main development since 2018 is the 2022 Amendment to the Employment Promotion Act (EPA), which allocates funds from the state budget for validation arrangements for acquiring a professional qualification or part thereof. The measure primarily targets 'economically inactive people'.<sup>2</sup> In order to access validation services (usually combined with vocational training), potential candidates have to be registered at the PES whereby the latter is also in charge of providing them with career guidance. The Amendment applies not only to Bulgarian citizens, but also to foreigners with temporary protection under the Bulgarian Asylum and Refugee Act.

External drivers for the legislation change may be related to findings and recommendations made in a recent DG Reform funded project: 'Reforming the Existing and Designing of New Measures for Activating Inactive Persons and Their Inclusion in the Labour Market in Bulgaria'. The project builds upon a recent OECD study: 'Reaching Out and Activating Inactive and Unemployed Persons in Bulgaria, Connecting People with Jobs', according to which, in 2019, the economically inactive people in the country made up one third of the Bulgarian working age population or more than 1 million individuals (OECD 2022). Based on that, a country recommendation addressed the need to 'invest more in re-skilling and up-skilling

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<sup>1</sup> VETA, Art.40, SG No.61/2014.

<sup>2</sup> These are defined as persons aged between 16 and 65 that do not work and do not have a social security number, are not registered at PES and are not in a formal education or training programme (Art. 3a, EPA).

programmes that provide people with employment opportunities in the primary labour market' (Scarpetta 2022).

While the Amendment to EPA intends to adequately respond to national skills shortages and expands the scope of ALMP measures (by including validation), not all aspects seem to be considered. For example, the Ministry of Education and Science (MES) and the National Agency for VET (NAVET) were against the Amendment as it does not include a requirement for having a minimum level of education. This requirement is defined in the VET legislation, for instance, people who wish to acquire a professional qualification at a certain NQF/EQF level through validation shall have a certificate for a completed level of upper secondary education (e.g., 12th grade for NQF/EQF level 4).

Overall, VNFIL developments in Bulgaria do not point in one direction: there are certainly areas where progress still needs to be made such as:

- the update of the regulatory framework and components thereof (e.g., funding of prospective candidates and/or VNFIL providers, monitoring, quality assurance of validation procedures);
- creating conditions for a (more) formalised coordination between career guidance and validation and thus providing better outreach and support to target groups including disadvantaged groups;
- catering for coherence between validation mechanisms used and/or tested in different sectors (e.g., VET and adult education);
- making VNFIL more visible and trustworthy in the civil society and more attractive for prospective candidates and social partners to be involved in.

On the other hand, some new initiatives have started over the last four years, for instance, in higher education, in the labour market and in other areas related to validation (e.g., the development of a National Skills Strategy), which in the longer term, may positively contribute to the implementation of VNFIL in the country.

## 3 National perspective

### 3.1 Overarching approach to validation

This section describes the general approach to validation in the country focusing on various aspects such as recent policies, the current legal and institutional basis, available data and databases.

Apart from the existing validation arrangements in VET, no other national/regional strategies and policies have been put in place: 'An overarching system of validation and recognition that covers both general education and vocational training, including employers' and other providers' training, as well as higher education, is desirable' (World Bank Group 2022a, p. 168). Judging from relevant policy documents and strategic papers, validation policies in Bulgaria are typically related to CVET in the context of lifelong learning policies. Their link to ALMP has become more prominent only recently, in particular, through the Amendment to EPA as described above.

Concerning recent policies, OECD is in the process of supporting Bulgaria to develop an action plan for skills policy covering also validation. This is done through two consecutive projects: during the first one (which ended in February 2023) the OECD conducted an assessment of the performance of the Bulgarian skills system and proposed numerous recommendations in a report: 'OECD Skills Strategy Bulgaria' (OECD, 2023). Simultaneously, OECD started working on the second project (expected to conclude in 2024) in which it partners with DG Reform in developing a Technical Support Instrument (TSI) to support Bulgaria in its efforts to implement the recommendations emerging from the OECD Skills Strategy project and other relevant

Bulgarian strategies.<sup>3</sup> Validation is an area that has been covered in both projects. For instance, the OECD Skills Strategy Bulgaria report recommends that the country reforms the recognition of prior learning (RPL)<sup>4</sup> system for adults to encourage greater take-up of RPL services and in particular, that NAVET, the MES, and the Ministry of Labour and Social Policy (MLSP) should collaborate with emerging RPL centre(s) to implement more streamlined and effective RPL processes and to incentivise greater take-up of RPL services, particularly among low-skilled adults (OECD, 2023). To do so the RPL process should be streamlined by simplifying and shortening the administrative process for both individuals and providers, altering the design of RPL certificates to match other learning certificates, collecting data on RPL outcomes through a data and evidence centre, and targeting RPL services to specific vulnerable groups such as the low-skilled (OECD, 2023). To incentivise greater take-up of RPL, the report recommends that subsidies for RPL fees be provided to individuals, similar to those provided for participation in adult education and training, and that grants should be available to adult education and training providers that offer RPL services (OECD, 2023).

A novelty also presents the National Youth Strategy (2021-2030) with its first strategic objective being defined as the promotion of non-formal learning. In particular, the Strategy emphasises the need to increase young people's access to quality non-formal learning by expanding the network of suppliers, adapting and implementing VNFIL quality standards as well as by creating respective validation tools (Ministry of Youth and Sports, 2021, pp. 21-22).

Regarding individual learning accounts (ILAs), Bulgaria does not have an ILA in place but plans to introduce it under the ESF+ funded 'Human Resources Development Programme' 2021-2027. Preparatory work on the introduction of ILAs started already in 2021, when the Bulgarian Industrial Capital Association (BICA), in its capacity of a nationally representative employers' organisation, designed and launched, in partnership with Confederation of the Independent Trade Unions in Bulgaria (CITUB), the project 'Development of digital skills', financed by the Human Resources Development Programme 2014-2020. Within the project two models for the introduction of an ILA were developed - at an enterprise level and at a national level. The two models specify implementation procedures and include a proposal for a regulatory framework. In May 2023, the Economic and Social Council (ESC)<sup>5</sup>, assigned by the Council of Ministers, adopted an opinion on the need for introduction and possible implementation of individual learning accounts and micro-credentials as a way to stimulate lifelong learning and employability. The ESC opinion recommends that the national model for ILA (designed in the 'Development of digital skills' project) can be used as reference. In addition, Bulgaria is taking part in so-called 'Individual Learning Accounts Labs' ('ILA Labs') organised as part of DG EMPL mutual learning activities.<sup>6</sup> Within the ILA Labs, key stakeholders representing national state institutions, agencies, social partners have to develop a roadmap for the implementation of ILA by the end of 2023.

In relation to legal and institutional basis for validation, apart from the 2022 Amendment to the Employment Promotion Act there has been no change in the current legal and institutional basis for validation since 2015-2016. The main legislative acts underpinning the national approach to VNFIL remain to be: the

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<sup>3</sup> <https://www.oecd.org/skills/centre-for-skills/national-skills-strategy-republic-of-bulgaria.htm>

<sup>4</sup> The report uses the term 'Recognition of prior learning' which is broader than VNFIL since it includes also recognition of formal learning.

<sup>5</sup> ESC is an advisory body representing the social partners and the civil sector organisations, <https://esc.bg/>.

<sup>6</sup> The objective is to support Member States in planning and successfully executing the next steps towards ILA implementation, based on their specific national priorities and starting points, as well as facilitating mutual learning between participating countries: Bulgaria, Croatia, France, Ireland, Italy, Poland and Romania,

Validation Ordinance for VET<sup>7</sup>, the Vocational Education and Training Act (VETA) harmonised with the Pre-school and School Education Act, which also regulates validation arrangements in general education, with the latter, however, being very rarely (if at all) used in practice.

Validation in VET can be carried out for all professions from the 'List of Professions for Vocational Education and Training (LPVET), which is the reference point for State Educational Standards for VET (see also the section on standards). Both, LPVET and a list/register of SES are available online on NAVET website in the form of pdfs.<sup>8</sup> Potential users are expected to know about LPVET and related validation opportunities mostly from awareness raising and information activities organised by e.g., national stakeholders (MES, NAVET) and/or by validation providers, which are certainly interested in recruiting potential validation candidates. According to national stakeholders consulted, there is a need of a better approach in reaching out to potential users (see the section on outreach and awareness raising).

As stipulated in the Ordinance for VET, all four VNFIL stages shall be implemented. Validation stages seem to be coherently connected across sectors to the extent to which validation outcomes from the education sector (VET) are used/transferred into a labour market context (so that individuals can access better jobs based on the validation certificate acquired). For instance, individuals, who validated professional skills, knowledge and competences receive legal documents, which give them the same rights as the rights of persons, who acquired qualification by formal education and training. These documents – certificate for validating a full qualification and certificate for validating a part of a vocational qualification (partial qualification) – can be used as an official legal document for continuing training or starting a job in EU member countries.

There is room for improvement when it comes to cross-sectoral coherence of existing and piloted validation arrangements e.g.: 'It is not clear how the system of validation of prior knowledge developed for adults' reintegration into primary or secondary basic education (see Adult Literacy Project: 'New Chance for Success' described later) is articulated with the system of validation for VET' (World Bank Group 2022a, p.163).

In relation to skills audits, these do not exist as such, but there are some similar, less far-reaching measures as commented in previous Inventory reports e.g. labour mediators at local (regional) PES are in charge of informal skills assessment of unemployed citizens. There is no evidence on the extent to which results from the informal skills assessment are being used for validation purposes, but based on national stakeholders consulted, the linkage is from rather weak to non-existent at all.

In terms of data collection and its quality assurance, the Centres of Vocational Training (CVTs) provide validation-related data to NAVET on an annual basis. Data refers to validation certificates for a full and partial qualification issued by the CVT for a specific profession (see section on validation trends). There are no specific quality assurance measures related to the data collection. In addition to CVTs, IVET schools and colleges can also be validation providers and as such they have to report related data to the regional administrations/inspection of education (RIEs) for the respective year in the respective region. This data is not publicly available, but for instance, the National Inspectorate of Education (NIE), which coordinates the RIEs, can use it as an indicator to assess the effectiveness of IVET providers in preventing dropouts from the education system (see, NIE 2020).<sup>9</sup>

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<sup>7</sup> 'Ordinance No. 2 from 13 November 2014 on the conditions and procedures for the validation of professional knowledge, skills and competences' SG 96/2014.

<sup>8</sup> The list of SES is also available from the website of the MES.

<sup>9</sup> The indicator is part of NIE's overall independent expert assessment of the quality of education provided in preschool and school education whereby this assessment is carried out on an annual basis.



## 3.2 Validation in education and training

Since 2018 there have been no major changes concerning the scope of validation in Bulgaria i.e. VNFIL continues to be predominantly implemented in the sector of VET (covering all respective qualifications or parts thereof) and this has been underpinned by the adoption and implementation of legislative acts supported also by the conduction of pilot projects highlighted in previous Inventory reports. As mentioned earlier, according to the Validation Ordinance for VET, all four stages have to be covered.

Between 2016 and 2020, an adult Literacy Project: 'New Chance for Success' created a pilot for a system of validation and recognition of prior learning for the purposes of adult second chance education. The project was designed to allow illiterate or poorly literate persons over 16 (who have not completed elementary or primary education) to take literacy courses and courses for learning curriculum of lower secondary education (i.e. literature; mathematics; English language; geography and economics). There has not been a follow-up of the project. The link between validation in AL (as conceptualised in the pilot) and validation in VET is not clear.

A new development in the sector is the launch of an Erasmus+ project, implemented by the MES that aims to develop and test validation arrangements in higher education (HE).<sup>10</sup> In particular, the project focuses on supporting the social dimension of HE including activities in two directions: a) validating the results of prior learning and b) ensuring access to and quality education for students from vulnerable groups. For both activities, there is a lack of specific regulatory provisions, as well as national practices.

Expected results by the end of the project (2025) include:

- **Development of a concept for validation of prior learning.** The development of such a concept and the identification of opportunities for its sustainable implementation are a huge challenge and imply targeted efforts of various national institutions and stakeholders. Therefore, within the framework of the project, existing international experience and good practices will be studied, the applicability of these will be assessed for different areas of higher education and a concrete mechanism will be proposed to be implemented in practice at the institutional (HEI) level;
- **Preparation of recommendations for the development of policies** and proposals for normative changes aimed at ensuring the possibility of validating previous learning and social inclusion of students from vulnerable groups;
- **Development and testing of validation mechanisms** (through pilots) aimed at achieving a more active and inclusive academic environment, with a clear commitment to the personal and professional development of students.

## 3.3 Validation and the labour market

Large scale validation initiatives in the labour market have not been implemented so far. The 2022 Amendment to the Employment Promotion Act allows for the allocation of budget for VNFIL of economically inactive people. The initiative will be implemented by the PES (responsible for the distribution of funding among potential beneficiaries) and will be complemented by training measures in the field of VET. Since the measure is quite recent, data on implementation is not available yet.

The National Skills Strategy that is currently being developed may focus on the provision of validation services to specific vulnerable groups such as the low-skilled (OECD, 2023).

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<sup>10</sup> Information on developments in the sector of HE is based on stakeholder consultation i.e. information on the Erasmus+ project is not publicly available yet since the project website is about to be launched.



### 3.4 Validation and the third sector

Validation measures in the third sector (youth organisations, NGOs, volunteering) remain to be largely missing as reported in previous Inventory reports. There is no systematic approach, but rather fragmented project-based activities carried out mostly within Erasmus+ projects. Thus, the transferability of validation outcomes to other sectors does not exist in practice.

Desk research and consultations with national stakeholders show that there is quite some interest on the side of youth organisations to be involved in validation procedures. For example, documentary work of the National Youth Forum<sup>11</sup> for the period between 2013 and 2020, highlights the need to recognise youth organisations (e.g. by state institutions) as non-formal and/or informal training providers<sup>12</sup> given that the latter conduct various trainings leading to the acquisition of relevant knowledge, skills and competences supporting personal development and labour market integration.

In addition to youth organisations, Bulgaria has a long tradition of cultural community centres, so called 'chitalishta' (читалища) that offer non-formal training, which are not directly job-related, but may have potential to become validation providers. The community centres provide access to library and internet services, which facilitates informal self-study for residents of small towns and villages.<sup>13</sup>

Considering the role that youth organisations, community centres, NGOs and voluntary organisations may play for individuals' lifelong learning, the development and adoption of validation arrangements for transversal competences (including the conceptualisation and stakeholder agreement on a transversal competence framework) may support the recognition of these organisations as providers of non-formal and informal learning.

## 4 Links to credentials and qualifications

The Bulgarian National Qualifications Framework for Lifelong learning (BQF), officially adopted in 2012, is based on state education standards (SES), covering all sectors of education. SES are structured into units of learning outcomes and this is expected to make the validation process easier and more transparent. For example, in the case of state educational standards for VET, each unit can be independently evaluated and validated i.e., as a partial qualification. The standards do not specify a maximum number of units for a qualification that can be obtained through validation.<sup>14</sup> Of note is that the BQF has not been fully developed for all qualifications e.g. not all SES for VET have their structure updated in terms of units of learning outcomes<sup>15</sup> (World Bank Group, 2022b, p.45). Furthermore, validation has not been integrated within BQF yet since the latter is restricted to qualifications from the formal education and training system only and does not regulate progression pathways between different levels and types of education. Partial qualifications acquired through validation are stackable and can be combined in order to obtain a full professional qualification on the NQF,

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<sup>11</sup> National Youth Forum (NMF) is a full member of the European Youth Forum and plays the role of a National Youth Council of Bulgaria since it is the largest youth umbrella organisation in the country with 46 youth organisations as members nationwide. Its main mission is to bring to the fore the role and the importance of youth organisations and youth work in development and creation of active and competent young people.

<sup>12</sup> E.g. a position paper from 2015, a declaration from 2017, an open letter to the Minister of Education (2020)

<sup>13</sup> For example, in 2022, there were 3,727 registered communities centres in Bulgaria, <https://chitalishta.com>

<sup>14</sup> An example of a standard for a 'daytime and evening hairstyles' (NQF/EQF level 3) is available at: <https://www.navet.government.bg/en/media/STATE-EDUCATIONAL-STANDARDS- updated.pdf>

<sup>15</sup> For example, older SES

however, there is no publicly available information on the number of persons/cases who have benefited from this opportunity.

As stated in previous Inventory reports, certificates acquired through validation do differ from those acquired upon completing regular education and training courses.<sup>16</sup>

VNFIL is currently not related to credit arrangements; however, the latter may change given that there are efforts to develop a validation mechanism in higher education, which do uses ECTS, for instance.

In relation to micro-credentials, there is still no agreed national approach and/or a common vision about how to use them, but the MES is working on this. In all cases, when conceptualising the approach, it will be important to highlight the added value of micro-credentials as compared to other similar instruments such as partial qualifications. For example, micro-credentials in Bulgarian are translated as 'micro-certificates' which may be associated with lower importance/value and thus generate mistrust among potential beneficiaries.

So far, there are no initiatives that embed validation in the curriculum and allow individuals to undertake learning with a non-formal education provider to have those validated. As mentioned above, youth organisations conduct various trainings leading to the acquisition of relevant knowledge, skills and competences supporting personal development and labour market integration, however these organisations are not officially recognised as training providers in the field of NFIL.

## 5 Standards

As highlighted in previous Inventory reports, SES for professional qualifications are the educational standards/reference points used for validation in VET and they are exactly the same as those used in formal education. SES define the obligatory competences needed in order to exercise a profession from the 'List of Professions for Vocational Education and Training (LPVET) and they are mandatory for all training institutions entitled to organise training courses and to issue the corresponding Certificates for vocational qualification or training upon their completion. SES are developed and/or updated by the National Agency for VET whereby working groups/expert commissions at NAVET (organised according to vocational fields) develop and propose to the MES drafts for new or updated SES. The commissions involve representatives of ministries (Education, Labour; relevant branch ministries) and social partners (employers' and employees' organisations from the relevant sector. According to VETA, qualification on a profession or part of a profession includes the combination professional competence (VET-specific component) and the general education knowledge and skills necessary for their formation (general education component). A current draft law on amending and supplementing VETA clearly defines for the first time what the term 'qualification on part of a profession' means. According to the amendment, at least 3 units of learning outcomes are needed in order for a person to acquire 'a qualification on part of a profession' whereby one of them shall be related to VET specific subjects.<sup>17</sup>

Although NAVET has developed new/updated existing SES for more than 80% of the professions included in the current LPVET, only approximately half of those have been approved by the MES and can thus be used in validation procedures. For those professions, for which no new/updated SES have been developed or approved, older

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<sup>16</sup> For instance, certificates for validation of a vocational qualification provide information on competences validated while certificates for a regular VET course/training completed focus on the course/training subjects included.

<sup>17</sup> More information on the draft law is available in Bulgarian at: [https://www.mon.bg/upload/35660/PR\\_zkn-nauchniltzsl-motivi\\_050502023.pdf](https://www.mon.bg/upload/35660/PR_zkn-nauchniltzsl-motivi_050502023.pdf)

reference points<sup>18</sup> (i.e., educational requirements that are not structured into units of learning outcomes) are used in VNFIL. The latter complicates the validation procedure.

There is evidence that validation providers (CVTs) are not directly notified when State Education Standards are changed. Thus, there is no clear procedure and timeframe for CVTs to accordingly adapt their training provision and validation services (World Bank Group 2022a, p. 51).

## 6 Institutions involved in validation arrangements and its coordination

There are no major changes over time of main institutions/stakeholders involved in the design, implementation and execution of validation: MES<sup>19</sup>, the Ministry of Labour and Social Policy (MLSP)<sup>20</sup>, the National Agency for VET<sup>21</sup>, the Public Employment Service<sup>22</sup> and the validation providers are the key actors. The 2022 Amendment to the Employment Promotion Act, seems to strengthen the role of the PES in the field of validation, particularly in relation to economically inactive people.

Coordination between institutions involved in validation and related activities is not defined in law. Recommendations based on the most recent report on professional training of adults highlight the need for increased coordination between the MES and the MLSP in the area of IAG (see section below) and financing. For example, the ministries were advised to jointly plan and ensure the implementation of financial support for validation services provided to disadvantaged and vulnerable groups on the labour market (Bulgarian National Audit Office 2019, 183). Furthermore, it was emphasised that responsible persons in the regional administrations/inspectors of education (RIEs) shall be appointed to provide assistance to PES territorial structures in supporting long-term unemployed persons to validate their professional competences acquired through informal training and informal learning (Bulgarian National Audit Office 2019, p.183). Also, the report recommends to the MES to set a mechanism for regular data collection and analysis covering all validation providers (Bulgarian National Audit Office 2019, 179).

Institutions that are allowed to provide validation linked to certification include Centres of Vocational Training (CVTs), which are mainly private CVET providers and vocational school and gymnasiums – typically, public IVET providers that are allowed to offer CVET to adults. As a result of the Amendment to EPA, the Bulgarian-German

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<sup>18</sup> These were called state educational requirements (SERs).

<sup>19</sup> MES prepares draft laws on validation procedures, develops guidelines, monitors and provides quality assurance of the validation system in relation to VET schools and colleges.

<sup>20</sup> MLSP provides information on the needs of validation related to unemployed people and raises awareness and organises information campaigns.

<sup>21</sup> NAVET is responsible for issuing licenses to authorise the operation of the Centres for Vocational Training (CVTs) and centers for information and vocational guidance (CIVGs). The Agency develops and proposes to the Minister of Education (for ministry's approval) the list of professions for VET and the State Educational Standards that correspond to the trainings to acquire those professions. NAVET defines indicators for CVTs to provide annual information on their activities and indicators for the centres to use in their internal processes of quality self-assessment. The Agency also methodologically supports VET institutions that conduct validation processes and promotes international recognition of VET qualifications (World Bank Group 2022a)

<sup>22</sup> The Public Employment Agency, under the MLSP, is in charge of guiding job seekers to relevant trainings that could enhance their employability. PES local branches connect prospective learners, mostly unemployed or economically inactive, with the trainings offered in CVTs, VET schools and providers of adult courses. PES also maintains close links with companies to identify their needs for qualifications and skills and direct these learners toward qualifications that are more sought after by employers, considering the predisposition, interests, and talents of each person. CVTs, VET schools' and providers of adults' courses (e.g. in key competences: literacy), in turn, are supposed to operate in close relationship with the PES (World Bank Group 2022a)

Vocational Training Center State Enterprise (DBBZ) has now become a validation provider.<sup>23</sup>

As stipulated in the Validation Ordinance for VET, to become an accredited validation provider, institutions have to fulfil various requirements among which: **appointment of a person** (usually a member of the teaching staff) in charge of the organisation and implementation of validation procedures at the institution, **establishment of a validation commission** for assessing/comparing learning outcomes acquired with learning outcomes required in order to obtain a professional qualification or a part thereof, **appointment of an individual consultant** that accompanies the validation candidate throughout the validation process, etc. According to national stakeholders consulted, the number of CVTs providing validation has remained constant during the last four years: although the accreditation procedure (the licencing process carried out by NAVET) may take longer when done for the first time, the renewal of the licences is easier afterwards. The accreditation procedure as such cannot be considered as demotivating factor *per se* for (would-be) validation providers. Challenging are rather the administrative capacities that providers need to have in place. Of note is also that validation providers (with the exception of DBZZ) are not directly financed through the state budget but by validation fees covered by candidates or through EU co-funded projects. The 2022 Amendment to Employment Promotion Act can make a difference in this context since costs for validation will be covered by the state budget as part of ALMP. It remains to be seen how it will work.

## 7 Outreach, awareness raising, provision of information, advice and guidance

### 7.1 Outreach and awareness-raising

According to national stakeholders consulted, broader awareness raising campaigns are largely missing in the country which may partly explain the low participation in validation procedures. Recommendations to the Minister of Labour and the Minister of Education (based on the most recent report on professional training of adults) emphasise the need to make validation more visible on the websites of both ministries though setting a separate validation section which: a) in a user-friendly and understandable language informs citizens about the benefits of validation, b) reference potential candidates to validation providers and c) informs about relevant ongoing or future events (Bulgarian National Audit Office 2019, p. 179, 183).

Monitoring results reported by the National Inspectorate of Education (NIE) show that since 2019 vocational schools and colleges have been prepared) to provide validation procedures (in terms of administrative capacities required), however, due to a lack of willing candidates, such procedures have not been conducted. The monitoring results refer to about 300 schools (12%) out of approximately 2,500. Based on this finding, NIE made a recommendation to school management and school teams to increase their awareness on how to effectively create conditions for validation, reaching out to prospective validation candidates (NIE 2020).

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<sup>23</sup> DBBZ was established in July 2011 with Amendment to the Employment Promotion Act, by virtue of which five Bulgarian-German vocational training centres (DBBZ) have been transformed from second level spending units to the MLSP into a legal entity DBBZ State Enterprise. DBBZ has its headquarters in Sofia and branches (which are also CVTs) in four Bulgarian cities: Pazardzhik, Pleven, Stara Zagora and Smolyan. As a licensed CVT, DBZZ provides vocational training to unemployed and employed persons over the age of 16 with acquiring a vocational qualification degree or qualification in a part of a profession, key competences training and vocational guidance, <https://dp.bgcpo.bg/en/>.

Furthermore, since a National Skills Strategy (that will cover the area of validation) is in the process of being developed, information on outreach measures and promotional activities planned is not available yet.

## 7.2 Information, advice and guidance

The main providers of information, advice and guidance on validation in the field of VET are validation providers (e.g. CVTs, VET schools and colleges), centres for information and vocational guidance (CIVGs), PES as well as training providers registered at PES. According to national stakeholders consulted, PES, CVTs, CIVGs) rarely provide information, advice and guidance on validation possibilities. The latter may be explained with the fact that roughly 1% of guidance practitioners at these organisations are aware of cases of validation and the benefits thereof.

Due to Covid-19 Pandemic, CVTs providing validation services increasingly have started to deliver telephone and online IAG (through websites or social media) to potential validation users (e.g., the CVT under the Health and Care Agency Association in the city of Vratsa<sup>24</sup>). Face-to-face IAG is delivered to validation users during the validation process. IAG after validation is usually not provided.

IAG is typically free of charge. Furthermore, if IAG is published online and the person has access to internet and has some language and digital literacy, information can be considered as easily accessible, however this may not be the case in smaller cities, towns and villages. Overall, IAG is neither tailored to the information needs of different target groups, nor is it connected to wider career guidance activities such as mentoring, counselling or follow-up guidance (i.e., following the validation procedure).

# 8 Validation practitioners

## 8.1 Profile of validation practitioners

Given that the Validation Ordinance for VET has not been updated since its adoption in 2014, the profile of validation practitioners, defined there, has remained unchanged.

In a VET context, validation practitioners refer to the members of the validation commission appointed at CVTs, vocational school/colleges and also, the individual consultant and the examination committees (see below).

The validation commission (at least 3 members) analyses the evidence provided by the person and each member prepares a preliminary comparison of the professional knowledge, skills and competences claimed to be possessed by the person with the learning outcomes included in the State educational standards (SES) for qualification in the respective profession. Possible results from the work of the commission include: a) the commission identifies deficiencies in knowledge, skills and competences with those specified in the VET qualification and in this case, the applicant is referred for further training; b) the commission establishes full compliance with the vocational competences in the SES - the applicant is admitted to take the examinations in theory and in practice of the profession for the recognition of a degree of professional qualification (or the examinations for the recognition of a partial qualification). The validation commission includes teachers meeting the requirements specified in the SES for acquiring a qualification under the profession for which the validation is performed. The composition of the commission may include external experts (e.g. employers), meeting the requirements for trainers specified in the respective SES;

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<sup>24</sup> [https://www.facebook.com/cpozdraveiqriji/?ref=page\\_internal](https://www.facebook.com/cpozdraveiqriji/?ref=page_internal)



however, employers, in general, show little interest in participating in validation commissions.

The individual consultant is a member of the validation commission and accompanies the candidate throughout the validation process. S/he is also responsible for the preparation, completion and submission of documents (e.g. person's portfolio and personal file) to the CVT archives in the in NAVET informational system.

By order of the Director of the CVT two examination committees shall be determined: one for the examination in theory of the respective profession and another for the examination in practice. These examinations are obligatory (also for regular VET students) and candidates cannot be exempted from it e.g. based on the results of the preliminary comparison of the validation commission. Requirements for the members of the examination committees are specified in the specific SES for VET.

## **8.2 Provision of training and support to validation practitioners**

Since 2014, there has not been any change in the support and training available to practitioners. In terms of online resources, the following methodological tools can be accessed: a guideline about how to organise and structure a validation procedure; a description of necessary documents and evidence that has to be collected by providers during validation procedures and examples of filled-in forms related to different validation stages. The methodological tools have been developed by the National Agency for VET.<sup>25</sup>

Since training (either initial or continuing) is not compulsory, regular provision is not available. Also, in terms of one-off measures, there hasn't been any larger training initiatives (including more than 20-30 professionals) since 2014. Also, training costs may be an issue.

## **8.3 Qualifications and experience**

The only mandatory requirements for practitioners concern the members of the validation commission and those of the examination committees which have to meet the requirements specified in the SES for acquiring a qualification under the profession for which the validation is performed. Some of the members of the validation commission and of the examination committees may be the same persons.

# **9 Inputs, outputs and outcomes**

## **9.1 Funding and costs**

There has not been any fundamental change in the funding arrangements for validation in VET since 2014 which are far from being sustainable and permanent i.e. there is neither a national framework that specifically allocates funds for validation, nor collective labour agreements covering VNFIL in specific economic sectors.

Furthermore, there are no systems/arrangements in place to collect information on the cost of validation and thus, the volume of public funding is practically unknown. Validation fees are not regulated as such in terms of amount. For instance, VETA stipulates that costs incurred by institutions for establishing, documenting, assessing and recognising the experience of candidates, as well as for conducting examinations

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<sup>25</sup> The tools are available here under the validation section: <https://www.navet.government.bg/bg/metodicheski-materiali-za-tspo/>

for acquiring a vocational qualification shall be paid at a rate determined by the institution, whereby the amounts should not exceed the actual costs. This means that prices will certainly depend on a) the qualification level (i.e. the higher the level, the higher the number of learning outcomes that need to be compared and assessed), b) whether validation is carried out for a full qualification or a part thereof; c) need of additional training and d) examination costs. Also, different target groups will need different level of support in terms of career guidance and counselling (e.g. number of one-to-one consultations with the individual consultant).

Financial support for beneficiaries may be available for specific target groups (e.g. economically inactive people under EPA) or within EU-co-funded programmes, but apart from that, candidates usually do not receive financial support. The latter certainly prevents some of them from entering into validation procedures.

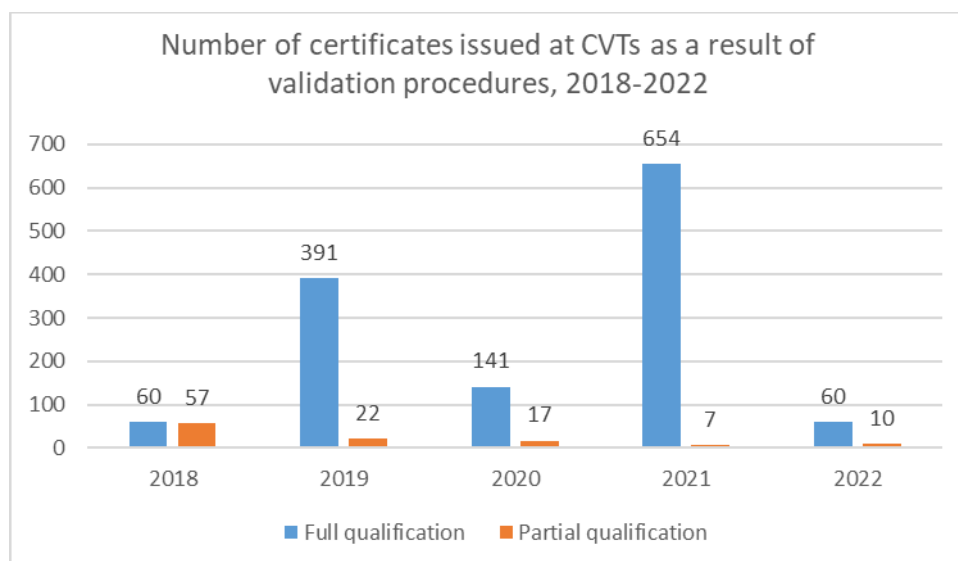
## 9.2 Beneficiaries and users of validation processes

### 9.2.1 Validation trends

In international comparison, the take-up of validation in Bulgaria is low and limited to a few economic sectors/professions e.g., personal services, restaurant, transport, construction, real estate, etc which typically use validation. This is reflected in the fluctuation in the number of validation certificates issued (see graph below). For instance, in 2018, 60 certificates were issued for the acquisition of a full professional qualification, in 2019 - 391, in 2021 - 654 and in 2022 just only 60 certificates. The increases in 2019 and 2021 are due to an increase in the need of validation for one specific profession – assistant teacher - which can be considered rather as an exception (extreme case) than as a real trend. When the need for validation for this specific profession decreases (e.g. 2022), this notably affects the overall number of validation certificates issued.

The graph below also shows that the number of certificates issued for the acquisition of partial qualifications has decreased from 57 in 2018 to just 10 in 2022, which can be explained with decreased interest on the part of potential validation candidates.

Figure 9.1 Number of certificates issued at CVTs on the basis of validation (2018-2022)



Source: NAVET. Data refers only to CVTs since for other validation providers (e.g. VET schools and colleges) data is not systematically collected:



Also, there is a huge difference between the number of licensed CVTs that may potentially provide VNFIL<sup>26</sup> (currently 900) and the number of those of them that are practically validation providers – less than 2%.

A positive trend is that during the observed period, validation certificates started to be issued for the first time for the following professions: paramedic, technician of renewable energy sources' and interpreter from and into Bulgarian sign language (all of them at EQF level 4). Typically, candidates' motivation for participation is that they will receive higher salaries based on their validation certificate (e.g., paramedics, see also the good practice example in the box).

## 9.2.2 Validation users

Data on validation users in terms of age, gender, target group, citizenship status is not collected and reported by validation providers. Data on qualification level achieved at CVTs for the last four years shows that validation users have predominantly completed validation procedures for acquiring qualifications at EQF level 4. The latter can be explained with the high number of validation cases related specifically to the profession of assistant teacher.

## 9.2.3 Validation and disadvantaged groups

The recent Amendment to EPA targets disadvantaged groups and in particular, economically inactive people. Since the measure is new, no data is available so far. Also, the National Skills Strategy that is in the process of being developed is expected to address the provision of validation services to vulnerable groups such as the low-skilled.

# 10 Validation methods

## 10.1 Methodologies and methods

There is no data on the introduction and use of innovative methods in validation by CVTs. The main point of reference remains to be the Validation Ordinance for VET, according to which, the individual consultant plays a key role during the identification and documentation phase since s/he considers the specific needs and supports the candidate in preparing, completing and delivering the candidate's portfolio and personal file in the archives of the validation institution. The validation commission uses a preliminary comparative analysis, the results of which, however, does not allow for candidates' exemption from the examinations in theory and in practice of the profession.

## 10.2 Use of ICT in validation

Candidate's portfolio and personal file (including evidence provided by the person) as well as the preliminary analysis of the validation commission are saved in the profile of the CVT in NAVET's information system (CVT's digital profile). After completing a successful exam, the validation certificate of the candidate is attached to the CVT's digital profile. Validation certificates are checked before NAVET publishes them on a public register which can be accessed e.g., by employers to compare information on

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<sup>26</sup> In order to be able to offer validation services for a certain profession(s), licensed centers (CVTs) must have experience in providing trainings of these profession(s),

candidates for different job positions. Information on validation certificate for a specific person is accessible through entering a personal identification number.<sup>27</sup>

## 11 Quality assurance

### 11.1 Quality assurance processes

The situation concerning quality assurance of validation procedures has not changed since 2018 i.e. a national/ regional/ local framework for the quality assurance of validation in VET is still missing.

For CVT validation providers, the licensing procedure, carried out by the National Agency for VET<sup>27</sup>, can be seen as a quality assurance mechanism. In order to be able to organise validation for a certain profession(s) licensed centres have to be experienced in providing trainings of these profession(s) and also, have to provide evidence of available capacity and expertise (e.g., in setting up a validation commission and examination committees, an individual consultant, etc.). Once CVTs receive the licence, they do not need to update it, however, NAVET carries out a subsequent control i.e., a regular inspection, which is scheduled for each CVT individually. The inspection is a complex procedure<sup>28</sup> covering a range of CVT activities among which conducted validation procedures. The inspection can be done based on documents submitted to NAVET's information system and additional documents (upon request) or through on-site inspection. If the inspection identifies incompliances, CVTs are first given a deadline for remedy. Immediate withdrawal of a license is only for severe cases, which happens quite rarely.

Other validation providers such as VET schools and colleges are in general, inspected by Regional Education Inspectorates whereby, the inspection refers to the overall quality assurance for educational processes carried out within these institutions.

### 11.2 Monitoring and evaluation

There are no comprehensive mechanisms for monitoring and evaluation on the take up and success of validation practices. As mentioned earlier, the MES was recommended to develop a mechanism for regular data collection and analysis on validation covering all validation providers (Bulgarian National Audit Office 2019, 179).

## 12 The position of validation in society; visibility and trust

Despite the developments described, validation remains to be rather unpopular in the Bulgarian society. Also, employers' interest to get involved remains low and there are no visible changes since 2018 concerning the extent to which validation outcomes are trusted.

In several areas actions can be undertaken to improve the overall perception of validation e.g.:

- Organisation of a wider information campaign(s) through various communication channels, aimed at different target groups (including disadvantaged groups);
- Creation of a more sustainable and flexible funding mechanisms to support individual beneficiaries in accordance with their needs (including disadvantaged

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<sup>27</sup> The register is available here: <https://www.navet.government.bg/bg/registar-na-izdadenite-dokumenti/>

<sup>28</sup> See, <https://www.navet.government.bg/bg/media/posledvasth-kontrol-za-saita.pdf>

- groups) and creation of incentives for education and training providers to offer validation services;
- Better coordination between ministries and their respective agencies in looking for linkages between career guidance and validation provision;
  - Expanding validation to other sectors e.g. higher education, the youth sector, etc.; exploring opportunities for creating validation arrangements for transversal competences;
  - Improving cross-sectoral coherence of existing and piloted validation arrangements e.g. in VET and adult education;
  - Developing an accelerated procedure for approval of new/updated SES and a notification mechanism for validation providers to quickly adapt their offer once a SES has been approved or changed;
  - Updating the regulatory basis for validation in VET (e.g. Validation Ordinance for VET) through
    - making the procedure less lengthy and bureaucratic;
    - including a requirement for minimum number of years in the profession for validation candidates and possibly an exemption from at least one of the obligatory exams (based on the results of the preliminary analysis of the validation commission)
  - Updating the profile of validation practitioners and considering opportunities and budget for providing them with regular trainings focusing on e.g., innovative validation methods and approaches;
  - Defining regular monitoring and evaluation procedures at CVTs, VET schools and colleges, etc. and exploring opportunities for the collection of more validation-specific data e.g., covering costs and benefits of different users and providers, etc.

### Example of good practice

The box below illustrates a good practice example capturing a CVT (validation provider's perspective). The example is considered good practice in Bulgarian regional context given the challenges that smaller validation providers in towns and smaller cities (with lower costs of living and average salaries) face. It is also significant in terms of the specific profession it focuses on – paramedic, provided that skills shortages in healthcare professions is a pertaining issue, particularly in less populated cities with less opportunities for CVET and career progression and in the context of the Covid-19 Pandemic.

#### Training and validation of paramedics in the northwest region of Bulgaria

##### Background information

The validation provider: The Centre of Vocational Training at the 'Health and Care Agency Association' (Сдружение "Агенция Здраве и грижи") in the city of Vratsa was founded and licensed as a CVT by NAVET in 2018. Since 2019 it provides training and validation in 10 professions, mostly in the sector of healthcare, but also in childcare. Services are provided in the cities of Vratsa, Pleven and Vidin.

Over the last three years, the Centre completed 16 validation procedures leading to the acquisition of a full professional qualification and 3 procedures for acquiring part of a professional qualification. Almost all of the procedures related to the paramedic profession whereby the increased interest is partly explained with the fact that due to the Covid-19 pandemic paramedics used to receive between 50-100 EUR on the top of their salary which does make a difference in the northwest region where costs of living and salaries are in general lower as compared to the capital and the bigger cities.

The specific profession: paramedic was included in the List of Professions for VET in 2011 and the adoption of the State Educational Standard for VET took place in 2016. The Standard differentiates three professional levels: a) Paramedic at EQF level 3: Transporting

injured and sick people and providing first aid; b) EQF level 4: Transporting, providing first aid and assisting in emergency centres and c) EQF level 5: Transporting, providing first aid and assisting the doctor in emergency rooms.

Most of the validation candidates of the Centre aimed to acquire EQF level 3 paramedic qualification since these were typically ambulance drivers with quite some practical experience on the job (10-15 years) and completed upper secondary education (12<sup>th</sup> grade according to the national education system).

### **Information and outreach**

As the Centre is a small one, prospective candidates are mostly reached out through social media (Facebook) combined with other channels e.g. brochures, telephone calls, face-to-face. Spreading the information through word-of-mouth was an important way of reaching out to the target group.

### **Personalised and individually tailored services**

Initially, validation candidates were supported in groups e.g. during information stage. However, it turned out that a more suitable approach would be the personalised one given that candidates need different support with some of them facing social problems. The individual approach has also proved to be a good solution for people who are not very used to using digital platforms, particularly relevant for distance learning (if additional training is required), downloading of learning materials and preparatory tests. Overall, digital tools (personalised emails, Viber) were used for communication purposes rather than as tools supporting one or another validation stage.

### **Validation and career guidance practitioners**

The director of the Centre fulfils the function of personal consultant (counsellor) of the candidates i.e. she prepares the individual plan (including costs) of each of them. The director has a long-year experience as a professional in the healthcare sector, knows in-depth the job descriptions, further training and career opportunities available for paramedics. Such a background enables the provision of a high-quality career guidance centred on the needs and possibilities of the person. In addition, the director/personal consultant acquired validation expertise through practice whereby the methodological guide for validation providers (developed by NAVET) was seen as a very helpful tool.

### **Costs and benefits**

Validation providers do not receive grants from the state for the provision of their services, so the costs for validation are fully covered by the beneficiaries who do not receive grants or any other form of financial support. There was a possibility for getting training vouchers (see the section on ILAs), however, it does not exist anymore, and it was also not flexible enough in order to be used in a validation context. Beneficiaries are motivated to cover their validation costs with own sources (most of them are working) because of the possibility to get higher salaries upon receiving the validation certificate. Also, costs are paid step-by-step. Nevertheless, the lack of grants or other forms of individual subsidies can certainly be a limitation for the participation of some candidates.

Major validation costs include: a consultation tax which covers the filling in of a formular and a detailed information map, around 10-15 pages altogether describing individual knowledge, skills, competences acquired. These documents are then analysed by the three members of the validation commission – with each of them filling in a separate assessment formular, which is a summary comparative analysis of learning outcomes acquired by the person and learning outcomes included in the respective educational standard for VET. Based on the results of the analysis and gaps identified, the individual consultant (counsellor) prepares an individual plan for each candidate, which usually includes additional training. Subsequent major costs relate to the additional training itself and tax for exams. So depending on the individual plan, the overall validation costs (producing the individual, additional training / exam where relevant, etc.) vary between 450-550 EUR per candidate.

In terms of duration, validation procedures shall be accomplished in up to three months including additional training if required and also exams.

The documents produced during the validation procedure are saved on paper (in a so-called individual portfolio of the candidate) and electronically at the CVT and in NAVET's information system.

From the point of view of the validation provider, the biggest benefit is to successfully support people in using career opportunities, which will otherwise get lost. For example, further education for paramedics (EQF level 3 to 4) and related professional mobility, higher salaries etc. is in shortage particularly in smaller cities since further training is available in the capital and in a few bigger cities. Thus, on a small scale, but important though, the Centre is an example of bridging the shortage of training and career opportunities for paramedics in the northwest region of Bulgaria. For example, 80% of the beneficiaries of the Centre are now working as paramedics and have achieved the career progression they were striving for.

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# European inventory on validation of non-formal and informal learning 2023 update

This report is part of the 2023 update of the [European Inventory on the validation of non-formal and informal learning](#). The inventory provides a comprehensive overview of validation practices across Europe, covering 32 systems in EU-27 Member States and EFTA countries.

The European inventory is the product of a long-standing cooperation of the European Commission, Cedefop and ETF on the field. The inventory was endorsed by the [Council recommendation of 2012](#) on validation and works together with the [European guidelines](#) as a tool to support countries in developing and implementing validation arrangements.

A rich source of information, the inventory informs dialogue and learning between countries and stakeholders developing and implementing validation in Europe. Our key objective is to support Member States so that more learners and workers can acquire and make visible new skills, which will support their career and further learning and improve their quality of life.

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