ANNEX 3

of the Commission Implementing Decision on the Annual Action Programme 2014 in favour of Belarus

Action Document on the Employment and Vocational Education and Training in Belarus

1. **IDENTIFICATION**

Title/Number	Employment and V Belarus CRIS number: ENI/2	ocation Education and 2014/030-979	nd Training in	
Total cost	Total estimated cost: EUR 11 500 000 Total amount of EU budget contribution: EUR 11 500 000			
Aid method / Management mode and type of financing	Project Approach Direct management – procurement of services and supplies			
DAC-code	11330	Sector	Vocational training	

2. RATIONALE AND CONTEXT

2.1. Summary of the action and its objectives

The present action covers the EUR 11.5 million support to employment and vocational education and training in Belarus under the 2014 European Neighbourhood Instrument (ENI) budget. The action is in line with the draft Country Strategy Paper and with the Multi-annual Indicative Programme for Belarus 2014-2017, as well as with the National Strategy of Sustainable Socio-Economic Development of Belarus until 2020, the Programme for Social-Economic Development of Belarus for 2011-2015 and the National programme for Demographic Security for 2011-2015. It will also align with "Education and Training 2020", a new strategic framework for European cooperation in education and training.

The <u>main objective</u> of the programme is to enhance the employment prospects of youth and adults by ensuring greater synergy between the vocational education and training (VET) system supply and the needs of the modern labour market, and to improve quality and attractiveness of the VET system in Belarus.

The action will promote flexible pathways between VET and higher education in the context of the national qualifications frameworks. Furthermore, it will contribute to an increase of VET attractiveness among young people, who will be more adaptable to work requirements, nationally and internationally mobile, technologically competent and capable to implement innovation, and as a consequence will have a positive impact on youth employability. Furthermore, while focusing on broader human capital development – including skills of youth and adult learners – the action will apply the special horizontal priorities aiming at greater sensitivity of all

supported government policies and implementation measures to the special needs of vulnerable groups of population, as well as gender equity criteria and sustainable development. These three priorities will be cross-cutting in the project design and will be subject to close monitoring.

2.2. Context

2.2.1. Country context

2.2.1.1. Economic and social situation and poverty analysis

Belarus, like most Eastern Partnership countries, has suffered a demographic decline. Both education and employment are thus faced with the constraints imposed by an ageing population and a shortage of a skilled and competitive workforce.

A mismatch of skills and the requirements of modern jobs are widening both in the public and in the private sector, worsened by the oversupply of graduates with tertiary degrees. The greatest demand of the labour market (77.6% of all vacancies) is registered with regard to worker occupations. The current Torino Process Report urges Belarus to deploy comprehensive policies and measures supporting the development of qualified workers, capable of implementing innovations, taking initiative and able to learn throughout their lives and improving labour mobility.

In Belarus, implementation of employment policies is mainly the responsibility of the local level within the general framework conditions set up nationally. The national employment plans give highest priority to ensuring inclusive character of its employment policies and support to vulnerable groups of population, especially young people, women and people with special needs, aiming at enhancing the mobility of young specialists in the labour market, as well as launching more active labour market measures and special programmes for disabled people. The Government also declares greater emphasis on the development of private entrepreneurship, especially small and medium-sized enterprises, thus measures have been implemented to assist broader categories of unemployed people in developing entrepreneurial skills. According to the Ministry of Labour and Social Protection the key challenges are quality of qualifications and employability of VET graduates, especially those relevant to innovation-intense economic sectors and future occupations, improvement of labour market analysis and information, including future skill needs' anticipation, collection of labour statistics in line with the International Labour Organisation methodology, career guidance, problems linked to the ageing population, specific measures for employment for disabled people, and the development of standards that can make Belarusian qualifications comparable at the European level.

2.2.1.2. National development policy

The programme envisaged in this Action Document is consistent with the state-supported development priorities reflected in the country's main strategic documents – the National Strategy of Sustainable Socio-Economic Development until 2020, the Programme of Social and Economic Development of Belarus for 2011-2015 (PSED) and the National Programme of Demographic Security for 2011-2015. These

National Report of the Republic of Belarus Torino Process 2012", prepared by Eduard Kalitski and Olga Sinelnikova, Republican Institute for Vocational Education in cooperation with the European Training Foundation.

documents promote the objectives of improvement of education and integration of the national education system into the global education environment, as well as ensuring sustainable population employment. The documents also highlight the concepts of skills-based and integrated education, especially for the vulnerable groups of the population. The PSED sets priorities of innovative development and competitive growth, and therefore puts great emphasis on the importance of improvement of quality of education, especially VET. Support to the development of high-technology industries presents new quality requirements to the human resources and stresses that the young generations need to possess flexible skills, be adaptable, mobile, technologically competent and capable to implement innovations.

The main beneficiaries, including the Ministry of Education, the Ministry of Labour and Social Protection and the Ministry of Economy, are committed and supportive to the modernisation of the VET system. Furthermore, the national stakeholders - Office of Prime Minister, Ministry of Labour and Social Protection, Ministry of Education, Republic Institute of Professional Education (RIPO), Institute of Labour, employer organisations and other stakeholders – have been involved into consultations in the course of the preparation of this document. A government decree is under implementation aiming at the introduction of the National Qualifications Framework (NQF) and the adoption of the concept of Sector Skills Councils. The Ministry of Education and the RIPO with the assistance of the European Training Foundation (ETF) have engaged themselves into the process of designing the concept and measures for VET Quality Assurance (QA), as well as support to continuing vocational training and pilot introduction of Sector Skills Councils.

2.2.2. Sector context: policies and challenges

The crucial role of VET in ensuring the country's economic and social development is undeniable. VET qualifications are absolute champions in terms of demand from the employers, while higher education still remains traditionally more attractive for young people, so, this creates imbalances in the quantity of supply and demand for specialists. At the same time, ensuring quality of - and trust in – qualifications, especially modern and new ones, remains a very serious challenge and thus contributes to the choice of priorities of support under the current activity. VET sector feels a severe lack of input from the side of employers due to undeveloped labour market intelligence, lack of systemic interface between economy and education, low involvement of experts from the side of employers into the definition of occupational standards and development of qualifications which are both critical elements of improvement of quality and relevance of VET provision.

The Belarusian education system is characterised by a centralised management and control by the state. Despite the progress and reforms over the past 10 years, the VET system still has major challenges ahead to prove its relevance to economic and social needs and to increase its attractiveness for young people as an alternative. Financing of the VET systems is still based on central budget allocations and multi-source financing has not been yet introduced.

Over the past years, the VET system in Belarus has undergone a number of organizational and structural changes in education and training. There have been significant developments in Belarus regarding development and strengthening of social partnership in VET. One of the key initiatives is improving labour market relevance of skills and competences of human resources, with the focus on the establishment of Sector Skills Councils and the introduction of the National

Qualifications Framework, as well as modernisation of standards and upgrading curricula. In April 2013 "The Comprehensive Plan for Development of National Qualifications System of the Republic of Belarus for 2013 – 2015" was adopted by the Deputy Prime Minister, which gave a framework and provided guidelines for these developments.

At present, there is low stakeholders' involvement in the improvement of VET system's quality, especially in terms of its responsiveness in provision of skills required in the labour market. The VET system has limited information on the quality of on-the-job training, where communication and exchanges regarding learning outcomes need to be strengthened. The culture of VET quality management should be improved and would need to include measures to strengthen motivation of teachers and masters to ensure their personal contribution into the overall VET provision quality. In addition, the anticipation of future skills is needed for improvement of VET quality and relevance by better addressing the local labour market needs.

Overall, the quality of VET needs to be improved to make the system modern and attractive, and to provide skills and knowledge for young and adult learners needed in the transitioning and globalising economy of the country. As part of this approach, measure for implementation of QA approach in VET are needed, to analyse and assesse the strengths and weaknesses of the system both at the levels of policy-making and VET institutions, supported by sharing, benchmarking and learning of experiences from other countries. At the centre of the QA in VET needs to be a wide scale capacity building of policy-makers and practitioners as well as social partners and other stakeholders who need to agree on the strategies for VET improvement towards meeting the country's economic and social development goals.

The current programme puts VET in a lifelong learning perspective and contributes to the public-private dialogue in Belarus on a broader scope of human capital policies. In the scope of lifelong learning approach, VET needs to provide flexible continuous VET and lifelong learning for adults, including recognition and validation of non-formal and informal learning.

2.3. Lessons learnt

Belarus and the EU have a limited record of cooperation in the educational sector in general and in the VET sector in particular, but an extensive experience of work in the field of support to quality infrastructure. The experience of the projects Support to quality infrastructure in food safety (AAP 2009) and Support to Belarus in the field of norms and standards (AAP 2010) show that Belarusian counterparts are willing to co-operate on technical proposals which can open doors to advocate necessary system changes and reforms in the concerned sector. The combination of technical supply with policy advice and capacity building proves to be the most efficient mode of intervention.

As an ETF partner country, Belarus participates in the Torino Process, a biannual participatory analytical review of the status and progress of VET in the ETF partner countries. The key priorities for further VET development in the ETF Torino report 2012 analysis of Belarus are inter alia the enhancement of quality, effectiveness and efficiency of the VET system, with special attention given to capacity development for evidence based policy making, monitoring, evaluation, as well as implementation

of quality assurance measures and tools both at the VET system and VET institution level. VET quality assurance and quality management, co-ordination and co-operation between different stakeholders as well as enhancement of capacity building are getting into the focus of attention of national policy makers, employers, social partners and education stakeholders in Belarus. The ETF report 'Support to establishment of Sector Skills' Councils in Belarus' (2013) notes that recently there have been significant developments in Belarus regarding development and strengthening of social partnership in VET.

Overall, the development of QA in VET is seen to be complementary to other reforms in VET in Belarus.

2.4. Complementary actions

Belarus has benefited from the EU higher education initiatives and programmes, but similar support to the VET Sector in Belarus was not available through EU programmes. The EU programme in the field of VET, like Leonardo da Vinci (under the Lifelong learning programme 2007-2013), was not opened for the participation of partner countries such as Belarus.

In general there are a limited number of donors active in the sectors of VET or that of the labour market. Only some small-scale initiatives are supported by a limited number of donors.

Since 2008, the ETF and national stakeholders started a discussion on possible future scenarios for the modernisation of the system. The ETF actions include:

- Support to contribute to human resource development (HRD) in Belarus (2009-2011);
- The Torino Process and Education and Business study (2010);
- The second Torino Process report and country self-assessment (2012);
- A number of initiatives related to piloting of quality assurance in VET and the development of accreditation, NQF and Sector Skills Councils in VET in Belarus.

During 2011-2012 Belarus was part of the Small Business Act (SBA) policy assessment in the Eastern Partner region. The final report was prepared by the European Commission, OECD¹⁶, ETF and EBRD¹⁷ (2012), and included policy recommendations in the area of human capital development.

In 2013 the EU Delegation commissioned a study on quality assurance measures in VET in Belarus in cooperation with the ETF and in the framework of its Torino Process, followed by a row of national consultations with different stakeholders. The study and the national consultations have informed the formulation of the present action on Employment and Vocation Education and Training in Belarus.

¹⁶ Organisation for Economic Co-operation and Development.

European Bank for Reconstruction and Development.

2.5. Donor coordination

The EU Delegation in Minsk is involved in several donor and sector coordination mechanisms, in line with the principles of the Paris Declaration and Accra Agenda for Action, aimed to ensure maximum aid effectiveness.

In addition, the European Commission and the European External Action Service organise regular implementers and donors meetings both in Brussels and in Belarus (2-3 times per year). EU Member States; United Nations family, Council of Europe and other donors such as the United States, Norway, etc. take part.

Although there is no formal sector coordination mechanism for VET, the different involved stakeholders actively share information in order to avoid overlaps and to seek more synergies.

3. DETAILED DESCRIPTION

3.1. Objectives

The <u>overall objective</u> of the action is to enhance the employment prospects of youth and adults by ensuring greater synergy between the VET system supply and the needs of the modern labour market, and improve quality and attractiveness of the VET system in Belarus.

Specific objectives:

SO1. To strengthen the link between VET provision and labour market demand to improve the relevance of qualifications in life-long learning perspective;

SO2. To improve quality assurance measures for VET qualifications and VET provision, and to develop relevant capacity of the VET system for enhanced employability of graduates;

SO3. To improve the Labour Market Information System (LMIS) for VET modernisation and enhanced employability of human resources.

3.2. Expected results and main activities

Strategy selected

Education, including vocational education and training, has always been one of the key government priorities in Belarus. The interest of the Belarusian government to initiate co-operation in this sector is seen as an excellent opportunity to directly contribute to the welfare of the Belarusian population by sharing best EU experiences. This programme could also provide an entry point for further cooperation programmes in the area of education and employment. The proposed set of interventions is based on a request of the Ministry of Education and the Ministry of Labour and Social Protection.

Technical assistance will be used to assist the national authorities (Ministry of Education, RIPO, and Ministry of Labour and Social protection) to implement measures targeting quality assurance of VET qualifications and VET provision, to further develop VET and labour market legislation and policies, to introduce and implement the national qualification framework and to create approaches for the systematic review and improvement of occupational and qualifications' standards, as

well as curriculum and teacher training for the implementation of competence based approach in VET. Along with this broad set of measures, more in-depth assistance will be provided to three sectors of the economy which tentatively could be: machine building, construction, and sustainable sources of energy. The sectors will be further refined and may be amended during the inception phase.

One pilot Resource Centre linked to one of the priority sectors of economy (indicatively, sustainable sources of energy) will be equipped technically and methodologically. The Centre will play the key role in piloting new policy measures. This would include upgrading the Resource Centre and improving the learning environment (learning complexes including equipment, software needed for running the learning programmes). The support is foreseen in the form of provision of supplies. The Centre will play the key role in piloting new policy measures.

The Steering Committee (SC) consisting of representatives of the implementing organization, Belarusian authorities, CSOs and the EU Delegation of the European Union to Belarus will be established to have a general guidance of the programme implementation.

The project will start from the inception phase, during which the baseline is to be established. The baseline indicators and the target values will be adapted accordingly.

Expected results

Under specific objective 1:

- R1. A National Qualifications Framework (NQF) and methodological approach for implementation are developed and applied in 3 selected economic sectors.
- R2. A National/sectoral mechanism for a dialogue and partnerships between social partners and VET system for ensuring relevance of qualifications to labour market demand is established.

Under specific objective 2:

- R3. VET quality assurance measures are adopted at national level and piloted at the provider level.
- R4. Improved capacity of VET providers.

Under specific objective 3:

- R5. Labour market information system collects data on skills' needs and provides access to providers, social partners and wider population.
- R6. Enhanced employability for youth and adults in Belarus, sensitive to the special needs of vulnerable groups of population, as well as to the principles of gender equity and sustainable economic development is enhanced.

Components

<u>Component 1: "Strengthen the link between VET provision and labour market demand to improve relevance of qualifications in a life-long learning perspective".</u>

This Component will strive at establishing a national/sectoral mechanism for a dialogue and partnerships between social partners and VET system. It will also contribute to developing and implementing the National Qualification Framework and its methodological approach.

This component will include capacity building activities for VET institutions, employment support services, employers` organisations, trade unions, civil society organisations, and other partners.

Indicative (non-exhaustive) list activities:

Design and adoption of the National Qualifications Framework;

Identification of emerging needs in the three selected sectors of economy and definition of priority occupations for these sectors;

Identifying current and future job market opportunities;

Providing analysis of the labour market based on the economic development of Belarus;

Making accessible the information on skills available on the labour market;

Review/definition of 20 new competency-based occupational standards for the three selected sectors of economy, including the piloting of methodology of development and review of standards:

Review/definition of 20 new qualifications for the three selected priority sectors of economy based on revised occupational standards and linked to NQF;

Revision of policies and legislation related to the adoption of NQF, including definition of the vision and strategy for the use of learning outcomes and validation of non-formal and informal learning;

Measures to improve statistical capacity and methodology of statistical data collection and analysis with the view to improve expertise and Government's capacity for evidence based policy making, monitoring and evaluation;

Adoption of the concept and regulation of Sectors Skills Councils;

Piloting and evaluation of the introduction of Sector Skills Councils in the three selected sectors of economy, which will develop and approve new elements of the national qualification systems - occupational standards, sectoral qualification framework, model cards for professional development and career growth, career guidance and counselling, etc.;

Exploring new approaches to education and business cooperation, including work-based learning options, alumni cooperation and promotion of employers'- and graduates' satisfaction surveys;

Identification of key information and data for anticipation of future skills' needs at national and at sector levels;

Piloting of methodology for anticipation of skills' needs and matching of supply and demand for skills at national level, including the development of a system of

Training Needs Analysis for Continuing Vocational Training (CVT) in the three selected sectors and with emphasis on emerging rather than current skill needs;

Support to definition of approaches and government policy capacity for embedding social inclusion in VET provision and ensuring implementation of government policies sensitive to the needs of vulnerable groups of population.

<u>Component 2: "Improving quality assurance and developing centres of excellence for the VET system".</u>

This component will deliver technical assistance to relevant national stakeholders (Ministry of Education, Ministry of Labour and Social Protection, and VET providers) to identify the most important issues to be addressed in the modernisation of the VET system, including quality assurance in VET; to improve capacity of VET providers and employability of graduates.

The component foresees the upgrading of a Resource Centre and improving the learning environment in order to pilot new policy measures.

This component will also include capacity building for organisations responsible for dealing with state statistics and VET, employment, labour market and entrepreneurship monitoring.

Indicative (non-exhaustive) activities:

Support to the concept development and preparation of the road map for introducing VET QA measures;

Identification of key VET QA indicators and development of measures for external and provider self-assessment;

Developing the methodology for QA in pre-service and in-service VET teacher training;

Implementation and testing the new concept of VET Resource Centre as a Centre of Excellence, which has a role in piloting and dissemination of self-assessment methodology for QA as well as in the development of methodology and piloting the new types of qualifications for curriculum development and teaching;

Provision of VET Resource Centre/s in one of the priority sectors with "turn-key learning complexes/systems" including equipment and software needed for running the learning programmes;

Capacity building activities (training, study visits, etc.) for VET institutions, employment support services, employers` organisations, trade unions, policy markets and other partners;

Training the main stakeholder groups involved in the implementation of VET QA measures aiming at capacity to implement external and self-assessment.

3.3. Risks and assumptions

Risks:

Repercussions of possible political 'collisions' between the EU and Belarus: This risk is considered as medium and will be mitigated by putting strong emphasis on the technical aspect of the project and its overall benefit for the population of Belarus. Project activities should reflect the critical need of national reforms and this makes them less dependent on the political climate.

Low level of commitment by the Government to reform the VET system in the country: The social and economic consequences of modernisation of the VET system may affect the motivation of the Government to carry out the necessary changes. Mitigation measures should include a high-level of consultancy with the Government, as well as development of the strategic sustainable partnerships among different stakeholders.

Resistance within VET institutions, VET teachers and other stakeholders to the introduction of new quality systems, career paths, qualification and curricula. Mitigation measures should include a high-level of consultation and involvement of the relevant stakeholders to the project and the intensive capacity building.

Assumptions:

- Financial and economic stability;
- Government of Belarus is committed to reforms;
- All relevant stakeholders are ready for an open and constructive dialogue.

Sustainability

Strong ownership by the main beneficiaries, including the Ministry of Education, the Ministry of Labour and Social Protection and the Ministry of Economy, will guarantee the sustainability. The demand-driven character of the intervention together with the deep implication of the Beneficiary during identification and formulation phases will ensure the necessary level of ownership. Capacity building measures will be implemented in close cooperation with the lead Ministries and other stakeholders.

The modernisation of the VET system in Belarus will contribute to the successful development of VET quality and increase compatibility of the country on the global labour market. This will guarantee the interest of the Belarusian side to ensure the ownership and further extending of the gained competence after the completion of the project.

3.4. Cross-cutting issues

All policies and measures developed, promoted and adopted under the project will be audited for sensitivity to vulnerable groups of population (with focus on people with special needs), gender equity criteria and in view of support to sustainable development. These three issues will be cross-cutting in project design and will be subject to close monitoring.

Among the special target groups are women in the view of their position in the labour market and employability, as well as their access to VET and continuing

education and training opportunities. Other important target groups include youth, elderly and people with special needs; so, all proposed policies and measures will be tested for being inclusive and supportive to the integration of these target groups into the active employment and ensuring their equitable access to all forms of vocational training and non-formal learning.

Modernisation of VET quality in Belarus will aim at integrating best environmental EU practices and supporting sustainable national economic development. The provision of skills for sustainable development in reformed (competence-based) curricula will contribute to equip the country for the transition to a low carbon economy. Furthermore, one of the indicative target sectors to be considered in VET includes the sustainable sources of energy.

3.5. Stakeholders

At the national level, the Ministry of Education and the Ministry of Labour and Social Protection in Belarus are the key institutions to ensure policy development, legislation and regulation improvements related to the VET system in the country. The Ministry of Economy should also be considered as an essential stakeholder in the sector.

The Republican Institute of Vocational Training (RIPO) has the role of supporting the Ministry of Education in coordinating and implementing the national programme and piloting of QA in VET, involving the VET Resource Centres (VET RCs) and institutions at the level of practice.

The role of VET RCs will become significant in the piloting and implementation of the national programme of QA in VET.

The Scientific Research Institute of Labour under the Ministry of Labour and Social Protection plays an important role is the field of research and acts as a facilitator of the development of qualification framework in VET. It also aims at ensuring the synergy between the labour market needs and the VET providers.

In addition to social partners, civil society organisations, as well as student organisations need to be systemically included across all activities of the programme to provide their stakeholder view on QA in VET. VET institutions need to diversify their provision addressing different target groups of adults and other learners. Flexible learning arrangements for adults with recognition of non-formal and informal learning are issues to be developed in the partnerships of stakeholder within the recent programme and piloting of QA in VET for adult lifelong learners. QA in VET should include civil society associations to secure quality and relevance of VET for learners who need social protection.

The end beneficiaries, who should directly benefit from the proposed action, are VET students, job-seekers, workers, elderly people and vulnerable groups of population. From the education system side, the final beneficiary institutions of formal VET: education institutions of Initial VET and Secondary Specialised Education, represented by VET Colleges and Resource Centres, corresponding to ISCED¹⁸ 3-4 levels, as well as a small fraction of ISCED-5.

¹⁸ International Standard Classification of Education.

4. IMPLEMENTATION ISSUES

4.1. Financing agreement

In order to implement this action, it is foreseen to conclude a financing agreement with the partner country, referred to in Article 184(2)(b) of Regulation (EU, Euratom) No 966/2012.

4.2. Indicative operational implementation period

The indicative operational implementation period of this action, during which the activities described in sections 3.2. and 4.3. will be carried out, is **60 months** from the date of entry into force of the financing agreement or, where none is concluded, from the adoption of this Action Document, subject to modifications to be agreed by the responsible authorising officer in the relevant agreements. The European Parliament and the relevant Committee shall be informed of the extension of the operational implementation period within one month of that extension being granted.

4.3. Implementation components and modules

4.3.1. Procurement (direct management)

Subject	Туре	Indicative number of contracts	Indicative trimester of launch of the procedure
Component 1 Capacity building activities; expert support in developing VET related documentation/standards/strategies; establishment of national/sectoral mechanism for dialogue; visibility activities.	Services	1	Q2 2016
Component 2 Capacity building activities; expert support in developing VET related documentation and revision of legislation/policies; visibility activities	Services	1	Q2 2016
Component 2 Technical and methodological provision of the VET Resource Centre	Supplies	1	Q2 2016
Evaluation and Audit	Services	2	Q4 2017 Q2 2020

4.4. Scope of geographical eligibility for procurement and grants

The geographical eligibility in terms of place of establishment for participating in procurement procedures and in terms of origin of supplies and materials purchased as established in the basic act shall apply.

The responsible authorising officer may extend the geographical eligibility in accordance with Article 9(2)(b) of Regulation (EU) No 236/2014 on the basis of urgency or of unavailability of products and services in the markets of the countries concerned, or other duly substantiated cases where the eligibility rules would make the realisation of this action impossible or exceedingly difficult.

4.5. Indicative budget

Component/Module	Amount EUR
Component 1 "Strengthening the link between VET provision and labour market demand to improve relevance of qualifications in a life-long learning perspective" + Component 2 "Improving quality assurance and developing centres of excellence for the VET system"	11 400 000
Evaluation and Audit	100 000
Totals	11 500 000

4.6. Performance monitoring

The programme will be monitored according to standard procedures. Such monitoring will include reviewing of feedback from the stakeholders involved into the programme. Objectively verifiable indicators (OVI), both qualitative and quantitative, will have to be part of the methodologies included in the technical proposals. Given the demand-driven character of the programme, the final OVIs must be designed properly and should be further revised at the start of the third year.

4.7. Evaluation and audit

It is foreseen that independent consultants directly recruited by the Commission on specifically established Terms of Reference will carry out programme's mid-term and final evaluations.

Furthermore, a strong focus will be applied on impact evaluation and systemic measures will be implemented to create an evaluation baseline and to adopt the

Monitoring & Evaluation framework, methodology and instruments prior to the start of implementation, ensuring that the same approach and methodology will be used for the evaluation of results achieved and the future impact. Results-oriented monitoring will complement regular evaluations systemically, in the course of all stages of activity implementation.

Complementary to the expenditure verifications the Commission may recruit independent external audit services to carry out external audits at any time during or after the Project's implementation.

4.8. Communication and visibility

Communication and visibility of the EU is a legal obligation for all external actions funded by the EU.

This action shall contain communication and visibility measures which shall be based on a specific Communication and Visibility Plan of the Action, to be elaborated before the start of implementation and supported with the budget indicated in section 4.5 above.

The measures shall be implemented either (a) by the Commission, and/or (b) by the partner country, contractors, grant beneficiaries and entrusted entities. Appropriate contractual obligations shall be included in, respectively, financing agreements, procurement and grant contracts, and delegation agreements.

The Communication and Visibility Manual for European Union External Action shall be used to establish the Communication and Visibility Plan of the Action and the appropriate contractual obligations.

In line with the recommendations of the EU-funded report "TVET¹⁹ and skills development in EU development cooperation", the emphasis on visibility should be shifted to communication strategies that entail a great deal more than web sites and logos. Communication initiatives should involve career guidance and intermediary services including labour exchanges and professional associations, social partners and civil society organisations.

On starting activities, communication and visibility plans will be prepared and submitted to the EU Delegation for approval.

¹⁹ Technical Vocational Education and Training.