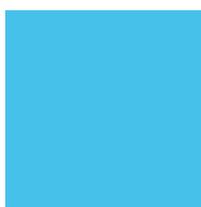
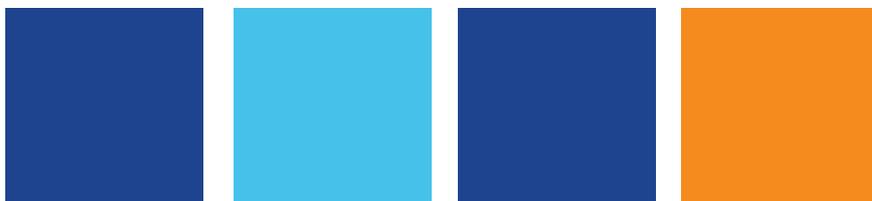

INTERNATIONAL MOBILITY
IN APPRENTICESHIPS: FOCUS
ON LONG-TERM MOBILITY
BULGARIA





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Author: Assenka Hristova

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#refernet

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CHAPTER 1.

Introduction

Bulgaria's education system went through a restructuring in 2016, introducing a two-stage secondary education, offering more flexible educational pathways. The current structure of the school system is organised in 12 grades, consisting of 7 years of basic education (subdivided to 4 years of primary and 3 years of lower secondary education), followed by 3 to 5 years of upper secondary education. Pupils enroll in secondary stage 1 (grades 8 to 10, with no EQF/NQF level assigned) at the age of 14. The end of this stage is also the end of compulsory schooling (at the age of 16). The graduates have a choice to continue their education in general or vocational tracks or to enter the labour market. At the end of the first secondary level graduates receive a certificate for completion of secondary education with access to vocational training for adults but not to tertiary education. Stage 2 of upper secondary education (grades 11 to 12, EQF/NQF level 4) is optional and allows the graduates to enroll in higher education. Vocational tracks are provided by vocational schools, arts, sports and religious schools, as well as by vocational classes in general schools. VET programs last from two to five years and have a compulsory general part (covering all the main curriculum in general secondary education) and vocational part. Depending on the framework program defining the level of vocational qualification, the duration of VET programmes is between 2 and 5 years. Most students enroll in VET at the age of 14. The enrolment rate in upper-secondary VET programmes (51%) is higher than the EU-average (48%) (1). VET graduates receive a VET qualification certificate in addition to the general education diploma. (2). After taking the State matriculation exams³, VET graduates may progress in post-secondary VET programmes, or in higher education. VET learners may choose between seven study forms (4), depending on the scope of the choice envisaged by the specific VET programme.

Work-based learning (WBL) is an integrated part of all VET programmes. It involves (a) study practice (*учебна практика*) at school premises as part of

(1) Eurostat, online data code: educ_uoe_enrs04

(2) CEDEFOP (2019)

(3) Currently, the compulsory State matriculation exam is the exam in Bulgarian language and literature. The state exams for acquiring VET qualification will become compulsory as from 2020.

(4) Daytime, evening, part-time, individual, distance, dual and self-learning.

regular classes during the school year and (b) production practice (*производствена практика*) delivered in a company (usually at the end of grades 11 and 12). This WBL is not considered apprenticeship, because it does not involve the signing of an employment contract and payment of remuneration. Depending on the framework program defining the VET qualification level, WBL could vary between 50% and 70% of the respective VET program ⁽⁵⁾. The Pre-school and School Education Act, adopted in 2016 introduced the apprenticeship (dual training) as a specific learning form alternating between practical training in a real working environment and school-based training. Although the students enroll in dual VET classes after grade 7, their in-company apprenticeship practice is implemented only in grade 11 and 12, involving 2 days per week in-company placement in grade 11 and 3 days per week in-company placement in grade 12, alternating with school-based learning.

Apprenticeships could be organised by a vocational school in a partnership with one or several employers on the basis of partnership agreements. The work-based placement of apprentices is defined by an employment contract.

Bulgaria is piloting an apprenticeship model (dual training model) since 2015. It has been introduced within the project “Swiss Support for the Introduction of Dual Track Principles in the Bulgarian Vocational Education System” (DOMINO project), financed by the Bulgarian-Swiss Cooperation Programme and implemented in cooperation with the Ministry of Education and Science, Ministry of Labour and Social Policy and Ministry of Economy. The project provided financial and capacity-building support to Bulgaria in developing its model of dual education, including support for curricula development and training of trainers. Additional support has been provided also by the Austrian Chamber of Commerce and the German-Bulgarian Industrial Chamber of Commerce, again through the implementation of projects targeted at the development of the apprenticeship model. In 2018/2019 3 884 students were enrolled in 177 dual VET classes ⁽⁶⁾. The largest number of apprentices is seen in the manufacturing of machinery and equipment, and manufacturing of apparel and furniture. Apprentices receive remuneration directly from the company providing the apprenticeship placement.

Bulgaria lacks a specific national policy to support the development of VET mobility in general and long-term mobility of apprentices specifically. There are no legal provisions explicitly regulating such mobility. Overall, long-term mobility of apprentices involved in dual training is constrained by the design of VET provision,

⁽⁵⁾ Minimum (a) 70% of VET programme time at NQF/EQF level 2, (b) 60% at level 3 and (c) 50% at levels 4 and 5.

⁽⁶⁾ Based on publicly announced data by the Ministry of Education and Science, accessible at <https://www.mon.bg/bg/news/3664> accessed 9.05.2019

requiring (a) simultaneous delivery of compulsory general education courses and qualification-oriented training and (b) strict weekly school-work alternation, with no options for higher flexibility of the education and training program. At the same time, employers face increasing challenges imposed by a serious gap between the specific knowledge and skills acquired at schools and the real requirements of their business and technologies used. Apprenticeship is considered a particularly effective tool in improving the labour market transition, meaning that any improvement in its delivery and quality (including through cross-border mobility) could facilitate quicker and more adequate transition into the world of work.

CHAPTER 2.

Exogenous factors influencing mobility of apprentices at upper secondary level

2.1. Economic sectors and actors

The Bulgarian economy is experiencing a strong growth momentum with robust growth of the real GDP at 3.1% in 2018 (3.8% in 2017). It is expected that the economy will continue to expand by 3.4% in 2019 and 3.3% in 2020⁽⁷⁾, mainly driven by domestic consumption and improving export potential. Despite the ongoing process of convergence, Bulgaria remains the Member State with the lowest GDP per capita, at 50 % below the EU average in 2018 (8).

Bulgaria has an open economy with the export accounting for 49.6% of GDP in 2018⁽⁹⁾. In terms of markets, Bulgaria's top 5 major partners (Germany, Italy, Romania, Turkey and Greece) are accounting for 46% of the total export. The major trade partner is Germany concentrating 15% of the total export.

A significant part of the large local enterprises is foreign-controlled, with a concentration of EU foreign direct investments in trade, finance, automotive industry, electronics, electrical engineering, cement industry, textile, construction, energy, etc ⁽¹⁰⁾. All top six FDI contributing countries in 2018 were EU-member states (Netherlands, Hungary, Germany, Norway, Belgium and France). Many Bulgarian companies are well integrated into the EU supply chain as suppliers and subcontractors for large European manufacturing companies.

The internationalisation of enterprise activity could contribute to increasing interest in longer-term cross-country mobility in apprenticeship. A coordinated exchange of apprentices between foreign companies and local subsidiaries, suppliers and subcontractors could provide an integrated approach to the development of technical and soft skills. However, as the predominant part of the employment is concentrated in SMEs, this offers rather limited opportunities for involvement in large scale international mobility.

⁽⁷⁾ Ministry of Finance of Republic of Bulgaria (2019)

⁽⁸⁾ Eurostat, online data code: prc_ppp_ind

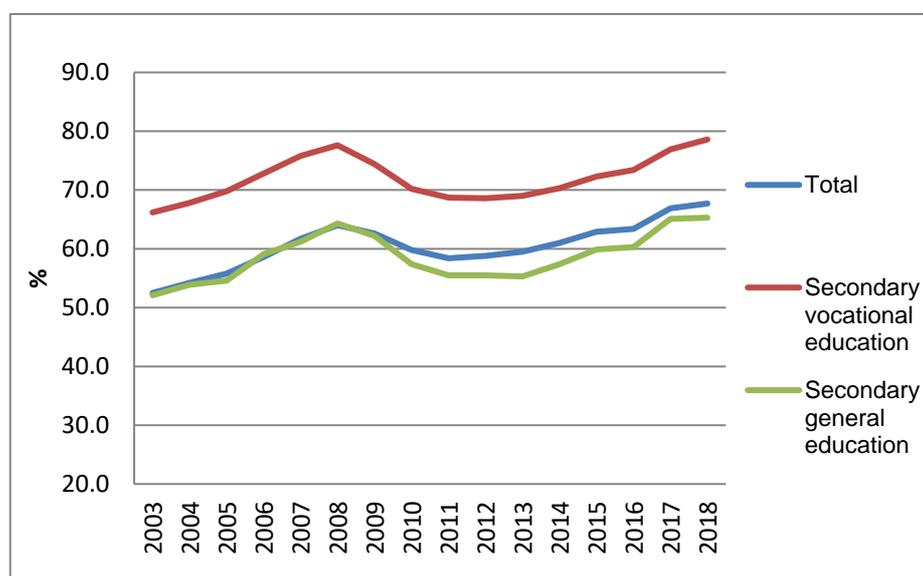
⁽⁹⁾ Bulgarian National Bank, External sector indicators, available at www.bnb.bg/Statistics/StMacroeconomicIndicators/index.htm accessed 13.05.2019

⁽¹⁰⁾ InvestBulgaria Agency, <https://www.investbg.government.bg/en> accessed 13.05.2019

2.2. Dynamics of skills demand and supply at the medium level occupation level

Bulgaria's labour market has improved considerably in recent years. Employment has expanded to the highest level since the country joined the EU. People with upper-secondary vocational education have significantly higher employment rate than those with secondary general education. However, in terms of labour market transition, VET still does not provide any sizeable advantage over general upper secondary education, with an employment rate of recent VET graduates lower than those of recently graduated from general education and considerably below EU-average (Figure 2). To some extent, this is due to the overall low-level labour mobility of young people and discrepancies between education and labour market demands for skills. As apprenticeships are considered a particularly effective tool in improving the labour market transition, any improvement in their delivery and quality (including through cross-border mobility) could facilitate quicker transition into the world of work ⁽¹⁾.

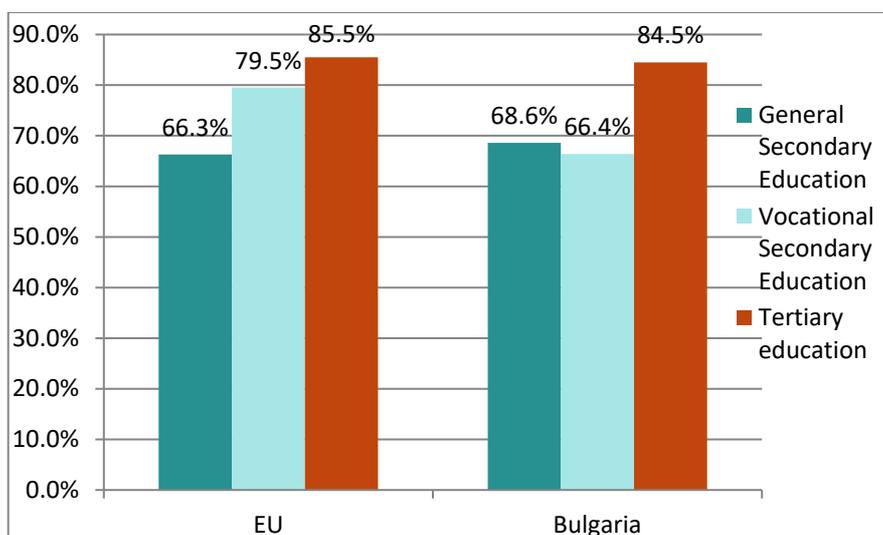
Figure 1. **Employment rate in Bulgaria (15-64 years-old) by education attainment, 2013-2018**



Source: NSI

⁽¹⁾ European Commission (2019).

Figure 2. **Employment rate of recent graduates (aged 20-34) not in education and training, 2018**



Source: Eurostat (online data code : edat_lfse_24)

Despite the recent positive labour market developments, the country faces significant challenges related to the skills shortages and skills gaps, as well as to the overall low employability of the low-skilled adults and young people.

Bulgaria's skills system is a source of concern. It is scored among the lowest-performing in the EU in terms of CEDEFOP's European Skills Index, with poor performance in skills activation and skills development, and fairly good performance in skills matching ⁽¹²⁾. There is a huge room for improvement in skills activation, as the local skills system is ranked 27th out of 28 countries. Introduction of apprenticeship is seen as an important mechanism for improvement of the skills formation system.

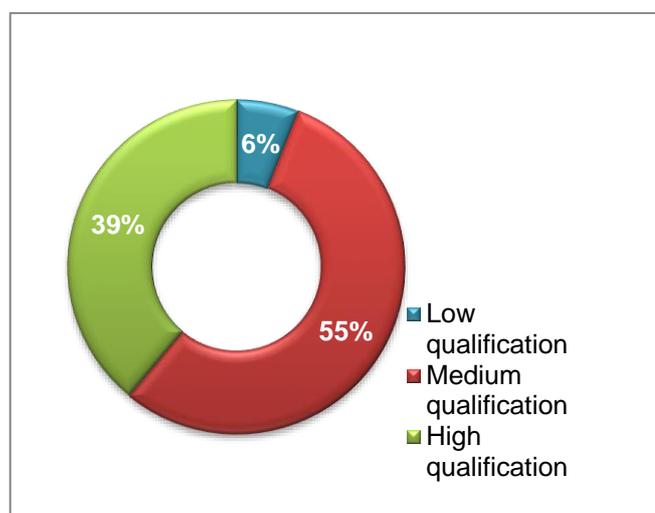
The wage levels in Bulgaria remain considerably lower than the EU-average attracting labour-intensive investments. The structure of employment in manufacturing is dominated by low (56% of all) and medium-low tech jobs (24% of all), while some 52% of jobs in services requires skills with a lower level of knowledge intensity ⁽¹³⁾. At the same time, an increasing need for technical and professional skilled workers is emerging. Among the top demanded skills are those related to introducing and using new technologies and equipment, or promoting

⁽¹²⁾ www.cedefop.europa.eu/en/publications-and-resources/data-visualisations/european-skills-index accessed 29.05.2019

⁽¹³⁾ Ministry of Labour and Social Policy (2019)

new products and services ⁽¹⁴⁾. Despite the growing demand for digital skills, the level of basic digital skills remains one of the lowest in the EU. Consistent measures to increase labour market relevance of VET and availability of apprenticeships are needed in order to address the short- and mid-term skills shortages and skills gaps in a consistent way ⁽¹⁵⁾. According to CEDEFOP's forecasts, 55% of job openings by 2030 will require medium-level qualifications, and only 6% will require low-level qualifications ⁽¹⁶⁾.

Figure 3. **Share of total job openings by level of qualification in Bulgaria (2016-2030)**



Source: CEDEFOP

A significant structural deficit of upper secondary graduates across sectors is expected in medium and long-term ⁽¹⁷⁾. To some extent, this deficit will be fueled by the intensifying intra-EU labour mobility. Bulgarian nationals are among the top-five national groups that contribute to over 50% of EU-28 labour migration in 2018 ⁽¹⁸⁾, with a predominance of younger emigrants (aged 20-34). The participation in longer-duration work placements abroad may contribute additionally to workforce drain, increasing the chances for easier and more effective integration to more advanced labour markets within the EU.

⁽¹⁴⁾ Employment Agency (2019).

⁽¹⁵⁾ EC (2019)

⁽¹⁶⁾ <https://www.cedefop.europa.eu/bg/publications-and-resources/country-reports/bulgaria-2018-skills-forecast> accessed 29.05.2019

⁽¹⁷⁾ MLSP (2019)

⁽¹⁸⁾ European Commission (2019)

Due to demographic changes, intra-EU labour mobility, global competitive forces, the upward income dynamics, labour market imbalances, changing the educational structure of population and deepening skills shortages, a gradual shift towards more technology-intensive investments could be expected in a long run. This could gradually put Bulgaria's economy on the path of skill-biased technological change. The future technological sophistication of economy depends on the availability of domestic and foreign investments allowing the large-scale technological transfer, higher innovation activity and improvement in skills. Efficient VET practices, including (long-term) outgoing mobility in apprenticeships, are a possible channel through which upskilling and technological diffusion could be enhanced. Granting the right for any school at the secondary level to provide vocational education ⁽¹⁹⁾ raises concerns about the adequacy of the technical equipment of VET classes in general and profiled secondary schools and gymnasias. Moreover, there are indications that Bulgaria faces difficulties in the provision of adequate upskilling and reskilling of VET teachers and trainers in technical specialities, particularly with the rising number of schools providing a dual system of education. This is a significant challenge that impacts negatively the quality of training in specific VET areas. At the same time, the outgoing international mobility, especially in technology-intensive industries could contribute to better access for Bulgarian apprentices to new technologies and adequate training related to the use of those technologies.

2.3. Attitude of employers towards training

Eurostat data ⁽²⁰⁾ demonstrate that IVET involvement of Bulgarian employers is gradually expanding but the share of enterprises employing IVET participants (7.6% in 2015) is still lower than most of the EU member states. Overall, VET schools still experience serious difficulties in finding a sufficient number of employers interested in the provision of apprenticeship (dual classes). Partly this is due to the fact that Bulgaria does not offer any sizeable tax reliefs or other financial incentives for businesses to invest in education. Existing "business-to-school" partnerships have evolved in a more structured and sustainable manner as part of the corporate social responsibility programs of large (often international) employers who target specific vocational schools with the prospect of supporting customised (more tailored to their needs) training and employing part of VET

⁽¹⁹⁾ Introduced in 2016 with the Pre-school and School Education Act

⁽²⁰⁾ Eurostat, online data code: [trng_cvt_34s]

<https://appsso.eurostat.ec.europa.eu/nui/submitViewTableAction.do>

students. But these business practices while important for a handful of schools are still limited. Given the fact that the predominant parts of the companies in Bulgaria are small and medium-sized, their lack of interest in investing in provision of apprenticeship placements (and mobility) is related to (a) lack of long-term strategic planning, (b) lack of capacity and (c) lack of guarantees that supported students will remain working for them after graduation.

2.4. Other relevant factors

Bulgaria is among the countries with the highest share of pupils in VET studying foreign languages, with 46.5% learning 1 foreign language and 49.6% learning 2 foreign languages ⁽²¹⁾. The most common languages studied are English (84% of pupils), Russian (29.3%) and German (23.7%) ⁽²²⁾. Nevertheless, the high level of attendance of foreign language classes in VET could be seen as an enabler for cross-border mobility, it is the proficiency of language usage that could turn into the main obstacle for outgoing mobility of apprentices. On the other hand, Bulgarian is not a popular language among European VET students, meaning that the incoming mobility of apprentices depends heavily on the foreign language proficiency of Bulgarian employers, mentors and co-workers.

⁽²¹⁾ Eurostat, online data code: educ_noe_lang02

⁽²²⁾ Eurostat, online data code: educ_noe_lang01

CHAPTER 3.

The link between the apprenticeship scheme design and apprentices' mobility

The dual apprenticeship scheme within the current school-based VET system in Bulgaria has been introduced in 2015 with the Preschool and School Education Act. It is established as a specific form of training for acquisition of vocational qualifications through (a) practical instruction in a real working environment and (b) class-based training at a vocational school.

The delivery arrangements are defined with the Vocational Education and Training Act (VETA) ⁽²³⁾, Labour Code²⁴ and Ordinance №1 of 8.09.2015 regulating dual VET ⁽²⁵⁾. There is no legal provision specifically related to the international mobility of apprentices.

Dual training is delivered at upper-secondary education stage 2 on the basis of partnership agreements between a VET school and one or several employers. Apprentices are organised in classes or groups in grade 11 and grade 12. The number of apprentices per class is determined on the basis of the numbers requested by the employer(s). The relationships between employers and apprentices are based on an employment contract. Apprenticeship scheme involves a cost-sharing arrangement, with the state budget covering the apprentices' health insurance contributions for the duration of on-the-job training. The main features of the scheme are summarised in Table 1.

Table 1. **Main characteristics of the apprenticeship scheme (dual VET) in Bulgaria**

Scope of programme	Combination of general secondary education and VET
Mode of delivery	Alternation between school-based and work-based learning
Minimum educational requirements	Secondary education stage 1
Learner age	16+ years

⁽²³⁾ <http://www.mon.bg/bg/57> accessed 3.05.2019

⁽²⁴⁾ https://mlsp.government.bg/ckfinder/userfiles/files/TPOOUT/BG_TPOOUT%3DNORMATIVE%20DOCUMENTS/Labour/Codes/KODEKS_na_truda.doc accessed 3.05.2019

⁽²⁵⁾ <https://www.navet.government.bg/bg/naredba-1-ot-8-septemvri-2015-g-za-usloviyata-i-reda-za-provezhdane-na-obuchenie-chrez-rabota-dualno-obuchenie/> accessed 3.05.2019

Duration	1-3 years; determined by the framework programs
Partnership between VET provider and employers	Compulsory contract between VET school and one or more employers
Type of contract and status of apprentices	Employment contract
Remuneration of apprentices	Grade 11 – minimum 2 x maximum amount of monthly scholarship ²⁶ Grade 12 - minimum 3 x maximum amount of monthly scholarship
Remuneration of trainers (mentors)	Yes, funded by employers.
Requirements for trainers (mentors)	VET qualification of higher; 3+ work experience Mandatory pedagogical training ²⁷
Cost-sharing arrangements	Yes, health insurance contributions are covered by the state budget.
Organisation of alternance	grade 11 – 2 days per week in company / 3 days per week in school; grade 12 – 3 days per week in company / 2 days per week in school
Obligation of the employer to offer a job after completion of training	No
Obligation of the employer to offer a job after completion of training	No
Access to tertiary education	Yes
Certification	Certificate for vocational qualification

Source: Adapted from CEDEFOP (2018) ⁽²⁸⁾

3.1. Apprenticeship type

Bulgaria's apprenticeship scheme is not designed as a separate VET pillar but is embedded into the existing school-based VET system, incorporating both compulsory general courses and qualification-oriented training. The general education minimum is compulsory for all schools and is a basis of acquiring general education. For VET students, the general compulsory courses ⁽²⁹⁾ are class-based and cover the entire syllabus of upper secondary general education, in addition to the VET-specific training syllabus. Moreover, the compulsory general education classes are evenly distributed within the entire school year (see also section 3.4). As long-term absence is not possible or leads to serious complications for

⁽²⁶⁾ Set with Ordinance № 328 of 21. December. 2017. The current maximum amount of monthly scholarship is BGN 60 (some EUR 31).

⁽²⁷⁾ Established with VETA amendments in 2018.

⁽²⁸⁾ CEDEFOP (2018). *Vocational education and training in Bulgaria: Short description*. https://www.cedefop.europa.eu/files/4161_en.pdf accessed 18.06.2019

⁽²⁹⁾ The 'core' compulsory subjects include Bulgarian language and literature foreign languages, mathematics, computer science and information technology, social sciences and civic education, natural sciences and ecology, arts, home economy and technology, physical education and sports.

students, it could make apprentices and their families particularly averse to involvement in longer-term international mobility.

3.2. Apprenticeship governance

Governance of vocational education and training in Bulgaria involves a rather complicated mechanism for distribution of functions and responsibilities across governance levels (horizontally) and between national and local levels (vertically).

At the national level, VET policy is defined by the Council of Ministers, while minister of education and science is responsible for the management, coordination and implementation of the policy. Apart from MES, Ministry of Culture (as owner of culture and arts schools) and Ministry of Youth and Sport (as owner of sports schools) participate in development of state educational standards for acquisition of qualifications, in provision of funding to their VET schools, in coordination of admission planning and in development of the list of professions for VET. Ministry of Labour and Social Policy and Ministry of Health also participate in the implementation of VET policy and in the coordination of the list of professions for VET. Separate agency - Human Resource Development Centre - coordinates the EU Erasmus+ program, which provides opportunities for long-term VET mobility.

At the same time, the state-ownership over predominant part of VET schools is combined with the allocation of a complicated (involving a wide range of stakeholders) decision-making autonomy at regional and local level with respect to VET planning and provision, including in deciding the number of students and vocational (dual) classes offered each year. Multiple social partners are involved in VET design and delivery. This decentralised governance framework, however, does not envisage apprenticeship-specific governance structures and still does not support the development of any coordinated practices for stakeholders' involvement and collaboration in the area of apprenticeship mobility programs.

Awareness is one major obstacle for Bulgarian employers (SMEs in particular) to actively participate in the delivery of dual training and in mobility projects. The latest amendment of VETA introduced a requirement for the Ministry of Economy to develop and maintain an information system providing information for all employers involved in the provision of apprenticeship. This could add additional value in terms of tackling existing information asymmetries, as currently the identification of host employers offering appropriate training opportunities is an overarching obstacle for the cross-border mobility of apprentices ⁽³⁰⁾. Bulgaria

⁽³⁰⁾ European Commission (2019).

lacks a centralised repository with information regarding apprenticeship opportunities abroad.

3.3. Duration of apprenticeship and of the company placement

Duration of apprenticeship (dual VET) training is between 1 and 3 years, depending on the occupation. Although students are admitted in dual classes in grade 8, based on employers' requests, during the first two years (grades 8 and 9) they study only the compulsory general education subjects. In most cases, their vocational training starts in grade 10 (mainly school-based) and expands to the real working environment (in-company placements) in grades 11 and 12. . The on-the-job training is delivered evenly throughout the school year according to a working schedule jointly elaborated by VET school and employer. The company placement excludes school holidays. However, the apprentices could be employed during the summer holiday on temporary contracts with the same employer. Although the duration of apprenticeship in most occupations could be seen as long enough to support the potential long-term placement of apprentices in companies abroad, none of the programs currently envisage a specific option for provision of such mobility.

3.4. Organisation of alternance

Under the current compulsory alternance scheme in Bulgaria, the possibilities for organising cross-country mobility of apprentices for longer periods are extremely scarce. Typically, apprentices in grade 11 alternate 2 days per week of WBL and 3 days of classroom-based education, while in grade 12 the alternation is vice versa: 3 days per week WBL and 2 days classroom-based education. No variations are possible within the programme. The apprentices are obliged under their employment contract to attend regularly their workplace. Apart from the rare cases (if any) of apprentices under individual or self-learning study forms, all other apprentices should compulsorily spend 2 or 3 days per week in their classrooms, without legally secure options to rearrange the combination of WBL and SBL.

3.5. Type of contract and status of apprentices

In-company placements of apprentices are based on a special type of employment contract, with a special clause for provision of on-the-job training. Bulgarian labour

legislation imposes a strict requirement for special protection of young people aged less than 18 years. Employers should have an individual permit for every single apprentice, issued by the Labour Inspectorate, which is a time-consuming and administratively burdensome procedure that often discourages employers. Moreover, apprentices should be employed only after a thorough medical preliminary examination and the medical conclusion that they are fit for the job. All this could be seen to add to the cost of placement and to present a barrier to mobility.

In fact, apprentices have a status of employees and all requirements of the Labour code apply. They are entitled to an extended annual paid leave (but in this case they must have obtained at least 8 months of service), unpaid leave and all other employment benefits. This employment status could be considered as a disabler for long-term mobility placements abroad. On one hand, any prolonged periods of absence from work due to mobility should be approved by the employer. On the other hand, having the strict rules of employment protection legislation, long-term mobility could be seen as a disadvantage from the employers' point of view.

3.6. Remuneration

Apprentices receive remuneration directly from the company providing the apprenticeship placement. The apprentices' wage levels are fixed below the levels of workers' wages. The minimal remuneration threshold for apprentices is based on the maximum amount of monthly scholarship (2 times the maximum amount of monthly scholarship ⁽³¹⁾ in grade 11 and 3 times – in grade 12) and depends on the number of working days. However, employers are free to negotiate higher remuneration. The obligation to pay remuneration could be seen as an additional disadvantage for employers in case of long-term mobility. Despite the fact that the minimum remuneration is set at very low levels, it could be especially challenging in case of small employers who in principle are very sensitive to their investment in apprentices. A recent study ⁽³²⁾ has found that investment in providing dual training is the biggest concern of Bulgarian companies, mainly due to lack of

⁽³¹⁾ The current maximum amount of monthly scholarship is BGN 60 (some EUR 31).

⁽³²⁾ Gallup International, Survey about the knowledge, attitudes and practices (KAP) among bulgarian companies and schools regarding the dual vocational education and training (DVET) and information regarding the DOMINO project impacts on the DVET knowledge attitudes and practices in the project companies and schools, DOMINO Project, 2019 <http://dominoproject.bg/wp-content/uploads/2019/10/Gallup-DOMINO-Project-survey-report-EN.pdf>

guarantees that they will be able to retain the student and the unclear prospects for return on investment. Having the fact that in-company placement does not involve summer holidays, for the employer additional absence of the apprentice due to long-term mobility would mean missed productive gains for a period up to one year. Provision on occupational health, safety and social insurance

As apprentices are employed on employment contract and receive remuneration, all relevant labour and health and safety regulations are applicable. Apprenticeship scheme involves a cost-sharing arrangement, with the state budget covering the apprentices' health insurance contributions for the duration of on-the-job training.

Having a low age and lack of skills and experience of apprentices, employers face certain risks related to health and safety hazards. This could have an adverse effect on their willingness to host international mobility apprentices, especially in more technology-advanced and hazardous industries.

3.7. Curriculum/training standards specification

In Bulgaria, all VET programmes leading to the acquisition of qualification are developed in accordance with the State educational standards (SES). The programmes for the in-company part of the training are developed in collaboration between VET teachers and company mentors and are endorsed by the VET school principal. According to the latest amendments in VETA ⁽³³⁾, the training programs should be updated at least once every five years.

The SESs are based on the ECVET recommendations and they provide a basis for linking units of learning outcomes with credits in VET. However, VET programmes are rather slow in responding to the complex and fast-changing needs of the world of work. Mobility is not part of the VET curriculum and this is a serious disabler, especially having the limited ability of schools to adapt the centrally-defined curricula to any mobility-specific needs.

3.8. Use of validation in apprenticeship

Currently there is no adopted mechanism for validation of learning outcomes acquired abroad. This presents a major impediment to long-term mobility of apprentices with strongly discouraging effect in terms of participation.

⁽³³⁾ in November 2018

CHAPTER 4.

Lessons learnt from existing policies, initiatives, projects of apprentices mobility

Bulgaria lacks specific national policy to support the development of VET mobility. There are no explicit legal provisions related to VET mobility and mobility in apprenticeship. No policy targets for removing the existing institutional and administrative obstacles to mobility in VET have been set up ⁽³⁴⁾.

Erasmus+ is the only funding mechanism for supporting apprenticeship mobility in upper-secondary VET. There are no funding schemes for non-Erasmus+ VET mobility at the national level.

The current experience is entirely related to short-term mobilities (Erasmus+ Ka1). A country-specific experience in the area of long-term cross-border mobility of apprentices is completely missing. In 2019, the new Erasmus Pro mobility programme has been launched to support the long-duration work placements of Bulgarian apprentices abroad. However, no long-term mobility projects have been funded under the first call for proposals.

Nevertheless the lack of publicly available data on VET mobility in Bulgaria, some important lessons could be identified at the implementation level:

- (a) the design of Bulgarian VET system seems to impact the short-term mobilities as well. As the prolonged absence is not possible within the current school-based system, the average duration of VET learner mobility in Bulgaria (18 days) is significantly lower than the EU-average duration of 32 days ⁽³⁵⁾. Work placements and exposure to work-based environment are the most common forms of mobility due to the fact that those placements are recognised as study practice;
- (b) schools in certain VET areas are more active in seeking opportunities for work placements abroad than in other. There is significant concentration of short-term mobilities in the areas of agriculture, tourism, textile and apparel, trade, construction, food technologies, etc ⁽³⁶⁾.

⁽³⁴⁾ CEDEFOP Mobility Scoreboard. <https://www.cedefop.europa.eu/en/publications-and-resources/data-visualisations/mobility-scoreboard/country-fiches> accessed 3.07.2019

⁽³⁵⁾ https://www.xarxafp.org/wp-content/uploads/2019/02/The-future-of-International-VET-Mobility_DG-EMPL_05022019.pdf accessed 3.07.2019

⁽³⁶⁾ <http://hrdc.bg/news/результати-от-селекция-на-проектни-пре-2/> accessed 20.06.2019

- (c) many VET schools have established long-lasting partnerships with one or several similar institutions abroad in order to carry out mobility projects. However, Bulgarian VET providers have rather limited access to wider mobility networks within the EU. They also lack access to a centralised repository of information regarding existing mobility opportunities and often have to rely on intermediary organisations.
- (d) for most schools, transnational mobility is more an ad-hoc activity than an integrated part of a comprehensive school development strategy or internationalisation policy. This could have important implications for their involvement in longer-duration mobilities, as the latter requires more careful planning.
- (e) many VET schools still experience capacity gaps to manage international projects. More specifically, the lack of language proficiency among the staff is a specific barrier discouraging some of the schools to actively develop and implement mobility projects.

CHAPTER 5.

Conclusion

Bulgaria's apprenticeship (dual training) scheme is in its initial phase and is still relatively uncommon among VET students and companies. At the same time, the internationalisation of enterprise activity, increasing demand for technical and professional skilled workers and search for effective tools to better adapt the skills formation system to enterprises' needs provide for increasing interest in dual training in general and in longer-duration work placements of apprentices abroad in particular.

Although the transnational mobility could contribute towards improving attractiveness and effectiveness of apprenticeship in Bulgaria, the current VET system design and structure pose serious impediments to the implementation of such mobility, especially for prolonged periods of time. Particular barriers at the framework and system/design-levels concern:

- (a) lack of targeted national policy to support and foster cross-border mobility of apprentices and related legislative approach to it
- (b) school-based structure of VET, combining both compulsory general courses and qualification-oriented training and leading to serious complications for students in case of prolonged absence
- (c) compulsory alternance scheme and lack of legally secure options to rearrange the combination of work-based learning and classroom-based learning
- (d) lack of mobility component in VET curricula and lack of opportunities for schools to adapt the curricula to any mobility-specific needs
- (e) lack of a mechanism for validation of learning outcomes acquired abroad
- (f) time-consuming and administratively burdensome procedure related to employment of apprentices aged less than 18 years
- (g) lack of access to centralised repository with information regarding apprenticeship opportunities abroad
- (h) weak stakeholder involvement in the governance of the apprenticeship system and lack of systematic collaboration between schools and employers.

At the implementation level, the most relevant and pressing obstacles for mobility in apprenticeship are related to:

- (a) lack of comprehensive school development strategies and internationalisation policies based on mobility
- (b) lack of awareness among companies about the opportunities and benefits from involvement in mobility placements

- (c) limited access of local VET providers to wider mobility networks within the EU
- (d) information gaps regarding existing opportunities for work placements abroad
- (e) lack of available data and research on mobility
- (f) capacity gaps related to management of international projects
- (g) lack of sufficient linguistic proficiency

List of abbreviations

ECVET	European credit system for vocational education and training
EQF	European qualifications framework
FDI	foreign direct investment
GDP	gross domestic product
EU	European Union
ICT	information and communications technology
MES	Ministry of Education and Training
NQF	national qualifications framework
SBL	school-based learning
SES	state educational standards
SME	small and medium enterprises
VET	vocational education and training
VETA	Vocational Education and Training Act
WBL	work-based learning

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