

Peer Learning Activity on Quality Assurance in continuing vocational education and training (CVET)

27-28 April 2021

Synthesis Report

1. Policy context

Continuing Vocational education and training (CVET) is an important part of lifelong learning and helps equip citizens with knowledge, skills and competences required in many occupations, responding both to learners' and to the economy and societal needs. **Quality assurance policies and mechanisms** are essential for CVET, to provide desirable and useful outcomes for learners, employers, and the overall society. The <u>Council Recommendation of 24 November 2020</u> on vocational education and training (VET) for sustainable competitiveness, social fairness and resilience, underlines that VET is underpinned by a culture of quality assurance.

During the ten years of its implementation, EQAVET has stimulated reforms in national quality assurance systems, but the EQAVET Secretariat Surveys (the last one from 2018) indicate that there are differences in implementing EQAVET in IVET and CVET. The general perception is that EQAVET was mostly applied in school-based IVET and to a much lesser extent in CVET and adult learning. Moreover, in a majority of EU-countries, there is no overarching system-level quality assurance framework for CVET.

This situation was partly attributed to CVET operating in a less regulated environment than IVET. Only in a few countries publicly funded CVET is delivered by the same providers as publicly funded IVET, and the quality assurance requirements are the same. The main issue for discussion is, given the need to increase upskilling and reskilling of adults, how can Member States contribute to increasing the quality of CVET and, in particular, to help all stakeholders better understand the meaning of 'quality CVET programmes':

- How to deal with the diversity of CVET provision, as an asset, in designing and implementing national
 QA arrangements for CVET from the lifelong learning perspective?
- How to take onboard the strengths of the international (such as ISO and EFQM) and company owned QA arrangements?
- How to boost participation in CVET and how to stimulate learners to choose quality assured VET, by personal entitlements such as 'individual learning accounts' (ILA)?

2. Objectives and content of the PLA: case studies, discussion and reflection

The participants at the PLA were representative of the variety of the VET systems from within and outside the EU: 61 participants from large and small systems, from centralized but also from decentralized systems, from Northern and Southern, from Eastern and Western Europe, from the Caucasian Region and Northern Africa.

To prompt discussions, some of the members of the National Reference Points (NRPs) of the EQAVET Network (from IE, CZ, Fr, NL and PT), were requested to present their experiences, good practices and challenges in relation to one or several issues proposed for the three work sessions:

- 1. The main challenges for Quality Assurance in CVET.
- 2. The use of the international or company QA labels and instruments.
- 3. Actual and possible policies regarding QA of individual learning accounts.

This section reviews the situation on the three topics under discussion by:

- Presenting relevant policies and practices (issued from the <u>case studies presentations</u> and the following Q&A sessions) as answers for the questions asked to prompt discussions.
- Summarizing the discussions in plenary meetings (for sessions 1 and 3) and in simultaneous workshops (session 2) on the three issue under scrutiny, beyond the experiences presented via case studies and other input materials (such as the background paper).

A. Quality Assurance in CVET – challenges and solutions

How can the quality of CVET be improved, considering its diversity? Which models and incentives may be used, for providers, companies, and learners?

CVET is more diverse than IVET in all aspects and focused on 'here and now', on the immediate needs for upskilling and reskilling. Moreover, a lot of CVET providers are small and operate in market conditions. Thus, they may have a limited capacity to implement sophisticated QA arrangements, established at system level and they expect public support in this regard.

Financing VET raises, as well, some major challenges for designing and implementing QA systems. For many CVET providers, the funding is ensured from different sources: national, regional and local; public (employment services, educational institutions) and private, from companies; national and international / EU funding (such as ESF or Erasmus+ Programme). The different funding bodies may have their own, maybe different, quality requirements and the public sector funds, usually, some CVET providers and, hence, national quality assurance requirements are applicable only to a selection of CVET providers.

The case studies reflected the diversity of CVET provision in different systems.

For instance, in <u>Ireland</u>, the publicly funded CVET is delivered by the same providers as publicly funded IVET, and quality assurance requirements are identical, based on standards for education and training, based on the National Qualifications Framework and on other regulations – for instance, concerning recognition of qualifications.

There are, as well, several strategic documents (the Further Education and Training Strategy - 2020-2024 and the National Skills Strategy - to 2025) acting as steering and unifying factors, focusing on skills, pathways and inclusion.

Quality Assurance is implemented through partnerships and stakeholders working together: Strategic Performance Agreements are signed between the 16 Education and Training Boards (ETBs) and SOLAS (the CVET funding & policy agency). Common Quality Assurance guidelines are developed by QQI (Quality and Qualifications Ireland), which also monitors and reviews the CVET providers. The QA requirements are comprehensive, but, considering the diversity of VET provision, they are not prescriptive – the provider being responsible for QA. They consist in a set of guidelines based, mainly, on the providers' own QA arrangements – approved, monitored annually, and confirmed by periodical external reviews.

In <u>Portugal</u>, CVET programmes are delivered by public schools (authorized for adult education and training by the Ministry of Education), Qualification Centres (authorized for adult education and training and for competences validation process, by the National Agency for Qualification and Professional Education - ANQEP) and vocational training centres (owned by the Public Employment and Vocational Training Service - IEFP).

All qualifications are registered in a national Catalogue, organized by learning outcomes, monitored by ANQEP, and the teachers and trainers are required to demonstrate pedagogical competencies (certified by the Ministry of Education or by IEFP).

The quality of VET provision is certified by The Directorate-General for Employment and Labour Relations – DGERT. The certification is not compulsory and aims quality recognition of providers' capacity for developing VET activities in different areas of education, in compliance with specific quality standards.

In the <u>Czech Republic</u> the CVET programmes provided outside the formal system are not regulated, but a system of validation of non-formal and informal learning outcomes has been gradually developed since 2007.

There are centrally set qualification and assessment standards for 1380 professional qualifications listed in the National Register of Qualifications.

The vocational qualification standards, drafted by employers, based on description of occupations and periodically updated, are the core of the quality system. The authorizing bodies are the Ministries in charge for the specific sector. The Ministry of Education and Youth, the Ministry of Labour Affairs, the Ministry of Interior, the Ministry of Health etc. are responsible for accreditation of some specific CVET programmes (e.g., for specific or regulated professions or re-training programmes).

The employers are, via the Sector Councils, are crucial part of the QA arrangements, because they have the best knowledge regarding the needs of the labour market, and they propose, usually, new qualifications and VET programmes.

How can the quality information available to users be improved? How can bad actors be more easily identified?

The immediate need seems to be to improve data collection and the indicators used for quality assurance purposes, at system and at provider level. Usually, there are data only on some CVET providers and programmes — mainly for the public financed ones. In a lot of VET systems there are no compulsory accreditation / authorization requirements for the CVET providers operating under the market rules and not intending to offer nationally recognized completion certificates.

The 2018 <u>EQAVET Secretariat Survey</u> shows that the CVET subsystems have, generally, more difficulties in collecting relevant data and to report on the 10 EQAVET indicators, especially regarding the effectiveness of CVET provision (for instance, the Indicators No 5 - Placement rate in VET programmes - and No 6 - Utilisation of acquired skills at the workplace) and the indicators relevant for closing of the quality cycle (such as Indicators No 9 - Mechanisms to identify training needs in the labour market - and No 10 - Schemes used to promote better access to VET).

The public has, often, a poor understanding of QA arrangements and it is difficult for users to find reliable, independent information on to the quality of a CVET programme or about the reputation of a specific provider. PLA participants added that even experts do not always have a clear overview of the specifics of various private QA systems. Most online platforms offering CVET (such as alison.com or LinkedIn Learning), use a user 'star' rating as the main indicator for quality, in terms of transparency. This shows the general 'satisfaction' level, based more on opinions and less on independent evaluation, reliable data or visible standards and indicators.

Form the CVET providers' perspective, a sophisticated data collection system (as a part of the national QA arrangements) may be prohibitively expensive and time consuming in the absence of national platforms and support.

How to improve the relevance of CVET, from lifelong and life-wide learning perspective? How to design and measure the quality of outcomes (mainly the learning outcomes) as match between learners' needs and the specific employers / workplaces needs?

Another challenge the QA systems for CVET must face is ensuring continuity and progress in career, from the lifelong learning perspective, and avoiding targeting too narrow and ultra-specialized skills. The main role, in this respect, is played by the regulating institutions established at system level and the data collection system, already mentioned, is essential in this regard.

The relevant regulations (including on standards, guidelines and other QA arrangements) and the National Skills Strategies, existing in most of the VET systems, may ensure this unifying role, by bringing together the essential institutions, such as Qualification and Quality Assurance Agencies, Ministries, organizations representing social partners, teachers and learners etc.

One recurrent topic discussed during the PLA was the need to define 'quality assured CVET', for both learners and companies, in easy-to-understand terms. Often, the QA arrangements (standards, procedure etc.) are very

technical, for national / system level QA systems and, as well, for international / company labels. So, in order to increase knowledge and trust in CVET, defining, explaining and promoting 'quality VET' becomes a necessity at policy level.

As a provisional conclusion, the most challenging aspect may be how to balance between 'flexibility' (needed by CVET providers and programmes to respond, in time, to the changing needs of individual and of the labour market) and 'quality' (i.e., observing pre-established requirements / standards while meeting the customers' needs) in QA arrangements.

Another important conclusion in this regard is that the 'one size fits all' policy type is no longer adequate: different needs, of different stakeholders, need different approaches.

B. The use of international Quality Labels/QA instruments

What is the experience of VET providers with the use of international / company specific QA instruments? Do learners take into account international QA instruments in their choice?

A well-known set of standards applied in organisations is the family of ISO Management System Standards: mainly ISO 9001:2015 (creating, implementing, and maintaining a Quality Management Systems); less ISO 21001:2028 (requirements and guidance for implementing Management Systems for Educational Organisations) and ISO 29993:2017 (Service requirements for learning services outside formal education).

'Excellence models' such as EFQM are also adopted by many players in the field. All these standards or sets of requirements are based on the PDCA ('plan-do-check-act') cycle – the same as the EQAVET framework.

The relevance of the international / company quality labels for the general public meets the same challenges, already mentioned – due to the lack understanding regarding QA and quality audits requirements. Choosing a relevant CVET provider or programme is, usually done on the basis of its public branding, rather than being based on independent evaluation, by known standards or procedures.

Aligning the EQAVET Framework with the EFQM Excellence Model and the ISO 9001 Standard was a topic for the work done by the EQAVET Secretariat (working groups and network), to identify common elements, redundancies, synergies and gaps. The conclusion of this analysis was that the background/principles, the goals & objectives, the perspective (stakeholder needs and satisfaction) and the methodology used (the PDCA cycle) are common. Moreover, ISO 21001 includes an annexe that maps its criteria against EQAVET, allowing for it to be used to implement EQAVET.

One perceived general issue is the lack of management and personnel with QA-related competences, often leading to the need to hire consultants to design and implement the quality systems – including those leading to international / company quality labels –, especially when there are differences between system level requirements (for instance, the national quality standards) and the requirements of the international or sectoral quality systems.

Do the Governments need to stimulate the use of the international / company specific QA instruments? Should Governments or the Commission specify rules for such QA instruments, similar to those in Annexe IV of the EQF?

The policies in this regard are very diverse. For instance, in Hungary, within the new regulations on CVET, EQAVET plays an important role (being considered more user friendly and easy to understand), but the role of international labels diminished. In Belgium (Flanders), on the other hand, when CVET is provided by public/private providers, they can register for a quality label from the labour market – the only condition being to demonstrate 'quality assured VET provision'. In Portugal, the same, the CVET providers, acting on the free market, may choose to adopt an international quality system. In Romania, a 'middle-of-the-road policy was adopted: a 'soft' QA system, based on authorizing the CVET providers willing to deliver nationally recognized qualifications, combined with the request for certification of the quality management system according to ISO 9001:2015 (as for all companies using public money or participating in public acquisition procedures). Finland

requires CVET providers to have an internal quality management system, which may be based on ISO/EFQM or other systems. In Malta, QA audit panels have been known to take an ISO/EFQM certification into account as proof of a quality policy while auditing.

As a general characteristic, the **international quality labels appear to be used mostly by private CVET providers**, **where there are no national / system requirements (or fewer requirements).** Moreover, there is evidence that **international quality labels can be important marketing vehicles** to increase the visibility and 'good public image' of the CVET providers (as in Tunisia, for instance).

Moreover, because the sources of CVET finding are more diverse, the different funding bodies may have their own, sometimes different, quality requirements. For this reason, in most of the CVET systems, **the national QA arrangements coexist with international / company ones**. But the degree of recognition and integration is very different from a system to another.

Quality assurance systems and frameworks need to encompass four key components, that could be the base for further development and convergence between QA arrangements at system level and the international / company quality labels:

- Quality assurance culture within the organisation mainly, how quality assurance is integrated into policy and everyday operations of the organization.
- Internal review, done by internal quality managers, with specific checkpoints to analyse the performance and allowing opportunities to solve the quality issues internally.
- External review, done by external auditors, assessing the organizational performance against a set of agreed benchmarks.
- Review of reviewers: the auditing organizations are reviewed, themselves, periodically, in terms of independence, objectivity, professionalism etc.

One issue, to be further analysed, is the business model of ISO and EFQM: in both models the process is copyrighted and have limited links with the public institutions in charge with VET, one of the main guiding principles being the independence of auditing organizations and of auditors. For instance, the audits of the quality management systems according to ISO standards are, explicitly, 'third party' audits – thus, independent from both providers and clients. For this reason, most of the organisations in the field are consulting companies entitled to perform quality audits, according to ISO or EFQM standards, by accrediting bodies. The CVET provider requesting quality audits based on international labels (or different company franchises) need to purchase the standards and/or the audit, and, often, the services of a consultant (different from the one involved in the quality audits).

What is the best for CVET quality management systems, to accredit CVET providers nationally, to leave this to the market, or to promote a hybrid approach?

Very few CVET systems have comprehensive accreditation arrangements for all types of CVET providers. Usually, only some CVET providers and / or programmes are supposed to follow the accreditation procedures and observe accreditation standards: if they are funded from public money and/or they are delivering qualifications recognized at national / system level (being registered in the National Qualifications Frameworks).

Generally, it is very difficult to require accreditation for all types of 'in-company' CVET and professional development programmes (for instance, the ones offered by employers for their own employees, including internship or apprenticeship schemes): many of them are short, focused on a limited number of skills or competences, and not leading to full qualifications. Moreover, limiting the types of professional development programmes may infringe the free-market and competition rules especially now, when the share of workers working in atypical forms of work and employed by atypical types of contracts has increased. In this respect, further discussion is needed to establish the role and the mechanisms of accreditation, especially for CVET providers, to cope the new market conditions in which CVET is functioning.

Data on the volume of quality labels granted within the ISO and EFQM systems is not publicly available. Surveys are published periodically but data is often incomplete.

The experience in VET systems regarding the adoption of international labels for accreditation is very different, as well. In some systems the CVET providers adopt, usually, the ISO standards, in others they do not. In some systems, the ISO or EFQM accreditation is used mainly by the private CVET providers, in others is recommended also for public CVET providers, in others the ISO or EFQM accreditation has no role.

C. Individual learning accounts

The discussion on 'individual learning accounts' emerged in the frontline of skills policies, at EU level, due to the need to ensure continuity and progress in career, for learners and graduates, and to enhance participation to lifelong learning, especially for at risk / vulnerable groups and individuals. The rapid changes in the economic conditions, the mobility of the workforce, the globalization and the challenges raised by the new technologies increased, exponentially, the need for reskilling and upskilling.

Data shows that the target of 15% participation in adult learning has not been reached by 21 of 27 Members States and progress is slow – including a setback in 2020 (according the <u>provisional data</u> published by Eurostat) due to objective factors (the COVID-19 pandemics).

Moreover, unequal access to training has been maintained, with many at risk / vulnerable groups not receiving sufficient support from employers and public institutions to increase participation in adult learning.

The 'individual learning accounts' (personal accounts in which training entitlements can be accumulated and spent on quality-assured training) may support the creation of flexible and viable upskilling / reskilling pathways, according with individual and social needs, and may support the underrepresented categories of adult learners to overpass the financial and non-financial barriers to participation. Furthermore, policies such as ILA, may promote quality assured transitions to, within and from the labour market.

How can QA arrangements be organised in the context of ILAs?

For the reasons mentioned above, a EU wide <u>consultation</u> on individual learning accounts has been launched, to see the potential for an EU initiative empowering all adults to participate in training, in order to reduce skills gaps and labour market shortages as well as ensuring social fairness. A <u>presentation</u>, in this regard, was made by the representative of the European Commission.

Several initiatives in Europe already support individuals to access CVET and other adult education programmes, from simple training vouchers granted to individuals, to complex arrangements involving individuals (employees, unemployed, adults in general or from specific groups etc.), training providers and public institutions. We underline that not all of them may be considered 'individual learning accounts', as defined in the case studies presented below.

There are a lot of individual barriers to be tackled by such initiatives, financial but also non-financial (e.g., time constraints, lack of motivation). One important issue, relevant for both CVET providers and learners, is how to facilitate the navigation across the training landscape and how to find trusted, quality training. The learners also need to have certainty about recognition of qualifications acquired. In this regard, the implementation of ILA initiatives is conditioned by increasing, as much as possible, the transparency and understandability of CVET programmes (including the QA arrangements) for individuals.

Closing the participation gap in adult learning is possible only with active and integrated measures: the classical publicity (using printed or digital marketing materials) has not enough potential to reach vulnerable individuals and groups. In this regard, there is a need to blend improved governance (mainly in terms of flexibility and promptness in response), with quality assurance systems (and quality culture) and with active support for learners themselves.

How to boost participation in CVET using ILAs? How to raise awareness and motivation to participate in CVET, in particular for vulnerable ('hard to reach, hard to motivate') individuals?

<u>France</u> developed and implemented, since 2019, an ILA system ('compte personel de formation' – personal training account).

In 2018, France introduced new regulations on VET, considered 'the big bang of the VET system', including ILA as an important component of the QA system, in order to empower individuals to participate in lifelong learning. For a fully autonomous person, with capacity and resources to choose learning programmes, the quality of provision becomes the main issue.

The first relevant component of the French QA system is the quality certification programme ('Qualiopi'), mandatory for VET providers delivering public funded training programmes. The Qualiopi brand applies to all providers (including independent trainers) of training and associated services (skills assessment, recognition of prior learning and apprenticeship training).

The register of such programmes includes all data needed for an informed choice, such as, the aims, the content and methods and the success rate for each training programme.

From 2022, the certification process will follow the franchise model: the accreditation committee (COFRAC) will accredit the certifying bodies, entitled to apply the Qualiopi certification to VET providers.

The second relevant component is the 'personal training account', allowing individuals to acquire training throughout their entire professional life, from the age of 16 to retirement. The personal training account is open for all private and public employees (with higher allocations for people with disabilities and for other vulnerable groups) no matter the changes in the employment situation (or the loss of employment) occur. With personal credentials (i.e., the social security number), each individual can see the personal rights / allocations for training, can apply and enrol in a specific programme at a registered provider, the costs of the training being reimbursed directly to the provider. The accounts may be fed from different sources (public, private, individual). In 2020 there were 13 million active accounts and 1 million individual training programmes financed.

In the Netherlands, a voucher scheme, named STAP (an acronym from the Dutch equivalent of 'Stimulus Labour Market Position'), implemented by the Public Employment Service, will be introduced from 2022, replacing the existing fiscal deduction system. It includes a subsidy for training (1000 euros per person, every year – the equivalent of a year of Master degree programme –, from the age of 18 to retirement, with a total of 200 million EUR yearly budget in the first year) and a system for recognition of prior learning, both available for unemployed and employed persons.

The eligible VET providers (and their programmes) are included in the STAP training registry. There are several conditions for a VET provider to be registered (e.g., to be recognized at national or sector level, to have accredited trainers, to implement a QA system etc.) and, very importantly, the training programmes must be relevant for the Dutch labour market (a methodology in this regard will be developed in the near future). The VET provider choses the quality assurance approach, from the five different quality labels available (involving self-evaluation, external assessment and the use of international labels, as well).

To monitor the quality of the VET provision, an independent committee will be set up and will carry out specific investigations (in case of abuse and improper use) and monitoring activities. To work towards comparable quality criteria, a quality framework for STAP is currently being drawn up, in which a minimum standard of quality control of the five categories will be established.

After selecting the provider and the programme from the STAP register, the interested individual registers with the provider and completes the training. The reimbursement of the costs is made directly to the training provider, after receiving the proof of attendance.

The discussions around these two models highlighted several issues:

 permanent social dialogue, including with VET providers, plays a vital role in implementing ILA: the training programmes must be relevant for the labour market in the same measure as for the individual learners;

- more flexibility is needed in reviewing qualifications and qualification frameworks. In this respect, it is important to open the discussion on micro-credentials and on partial qualifications;
- there are already concerns, but also arrangements, regarding QA of ILA. For instance, there were introduced quality control mechanisms such as: input requirements for eligible CVET providers and individual learners, monitoring independent bodies and procedures etc;
- with ILA initiatives being relatively new, there are no impact studies available, yet. For now, in France are implemented, as feedback mechanisms, learners' satisfaction and follow up surveys, aiming to find out if the training was useful to find a job or for reconversion. But impact evaluation is needed to measure the return for investment of ILA initiatives.

What types of support services (information, guidance etc.) are needed to ensure the effectiveness of ILAs? How can ILAs promote their provision?

Some support services were mentioned in the presentations and during discussions, but the topic was not discussed, in depth. For instance:

- Registries of available training opportunities with or without rating systems from beneficiaries.
- Information on services available using conventional or digital means for individuals searching training opportunities and for CVET providers, as well.
- User friendly access for the enrolment portals.
- Counselling / guidance for applicants to choose the right training programme, from both perspectives (individual needs and labour market needs).
- Other learning support services such as mechanisms for validation of prior learning, support for key-competencies development etc.

However one important issue remained less discussed: how to boost the enrolment of vulnerable ('hard to reach, hard to motivate') individuals in CVET programmes, by using ILA. The available research shows that, usually, educated persons are searching for further education and that the amount of individual investment in education is positively correlated with the individual income.

3. Lessons learned

This section summarises a few takeaway points in view of the objectives of the PLA.

How to develop and improve QA arrangements in CVET at VET system level and VET provider level in order to enhance the learners' and companies' trust and to boost participation and effectiveness?

The role of the governance arrangements at system level needs be preserved, to ensure transparency and trust and to ensure the inclusive character of CVET. The QA arrangements will ensure the cooperation of all stakeholders in developing:

- More flexible and responsive regulating institutions. Very important in this regard, is to ensure the cooperation between the institutions in charge for education and labour (Ministries and similar central institutions).
- National Qualifications Frameworks and quality standards (as unifying instruments from the lifelong and life wide learning perspective).
- Strategic documents such as national strategies on skills, VET or QA.
- External, independent evaluation and accreditation / certification mechanisms.

There is an obvious need to expand institutional arrangements and make them more flexible, to include and to recognize all learning outcomes – including from apprenticeships, internships and other forms of work-based learning, and from online or blended learning programmes. In this respect, it is necessary to improve and generalize the mechanisms for recognition, validation and certification of prior learning, including for competencies acquired in informal and nonformal contexts.

How to use the strengths and mitigate the weaknesses of international / industrial QA systems / labels?

Member states show a clear preference to maintain direct control over accreditation of CVET providers, deciding who should be accredited, under what conditions, and also in operating any auditing / inspection procedures. However, given the high diversity in CVET and its QA, international / industrial QA systems / labels can play an important role in helping institutions build QA systems that meet these requirements, and in creating some level of harmonisation between QA Systems in different institutions.

Ensuring that QA officials and reviewers have a proper understanding of common QA systems in use within a country would simplify the review the process and allow them to rely on these instruments in coming up with their conclusions, recommendations, and assessments.

Another direction for action is to ensure convergence in developing QA systems for VET (mainly for CVET) with the international and / company owned QA systems, by focusing on advantages and by minimizing costs and bureaucratic burden.

How can QA arrangements be organised in the context of individual learning accounts?

The first step is to support stakeholders to devise standards and agree on common criteria for 'high-quality CVET programmes', so that it is easy for learners to recognise and to access quality CVET. Yet, publicizing the offer on websites is not enough to reach and motivate low-skilled groups who are, traditionally, hard to reach and hard to motivate to learn lifelong and life wide.

Further discussion on the quality assurance of individual learning accounts is needed, including the following topics:

- How to correlate ILA with micro-credentials: from a life-long learning perspective it is important to consider short, but quality assured, training programmes, as well, as tools for bringing, as fast as possible, adequate training to the individuals needing it.
- How to stimulate participation through financial incentives: e.g., a 'wage replacement' to compensate individuals and/or employer for the time spent in training programmes.
- How to clearly define the preferred target groups: for instance, only 'low-skilled' individuals or to extend the programme for 'medium-skilled' or 'high-skilled' persons.