

InTheLoop4VET - Memorandum of Understanding:

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

This Memorandum of Understanding (MoU) establishes the set of rules concerning the protection of personal data (GDPR) in the use of a digital repository for interactive reporting on the feedback loop mechanism created in the framework of the Erasmus+ project InTheLoop4VET. This MoU also provides the cooperation framework, establishes a communication channel and determining specific working arrangements between the Signatory Parties, who share a common vision and willingness to **improve VET Providers' Uses of Graduate Tracking feedback** – based on the principles of **protection of personal data**, common interest, reciprocity and complementarity.

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

1. Concept

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

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

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

2. Objectives and scope

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

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

The signatory parties unite in pursuing the following main objectives:

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

In this way, the InTheLoop4VET MoU intends to contribute also to the **principles and objectives defined at European level**, as most recently stated in declarations such as the [Osnabrück Declaration \(2020\)](#), which identifies quality VET as an enabler of innovation and recovery and an essential foundation for green, digital and sustainable growth, the [Pact for Skills \(2020\)](#), initiative promoted by the European Commission to upskill and reskill the European workforce, embedded in the European Green Deal, supporting green and digital transitions as well as industrial and SME growth strategies.

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

a. Protection of personal data

The right of [Protection of personal data](#) as stated in article 8 of the [European Charter of Fundamental Rights](#):

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

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

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

The European Commission has appointed a [data protection officer](#) who is responsible for monitoring and the application of data protection rules in European institutions. The data protection officer independently ensures the internal application of data protection rules in cooperation with the European data protection supervisor.

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

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

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

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

Personal data shall be:

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

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

4. Legal nature of the MoU

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

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

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

5. Signatory parties

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

For the Signatory Party

Name:

Job position / Field of expertise:

Organisation:

Country:

Signature: