FIRST ITALIAN REFERENCING REPORT TO THE EUROPEAN QUALIFICATIONS FRAMEWORK – **EQF**

SUPPORTING DOCUMENTS

Adopted on December 20th, 2012

CONTENTS

STATE-REGIONS AGREEMENT OF 20TH DECEMBER 2012 N.252 ON REFERENCING THE ITALIAN QUALIFICATIONS SYSTEM TO THE EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING (EQF) IN ACCORDANCE TO THE RECOMMENDATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL OF 23 APRIL 2008

THE PERMANENT CONFERENCE FOR THE RELATIONS BETWEEN THE STATE, THE REGIONS AND THE AUTONOMOUS PROVINCES

OF TRENTO E BOLZANO,

In consideration of

(List of national regulations – few citations):

- Legislative Decree of 15 April 2005, *Right-duty to Education and Training;*
- Decree of the President of the Council of Ministries of 25 January 2008, *Guidelines for the re-organization of Higher Technical Education and Training System and for the establishment of Higher Technical Institutes;*
- State-Regions Agreement of 20 March 2008, *Definition of minimum standards for accreditation;*
- Law 30 December 2010, *University System and quality standard;*
- State-Regions Agreement of 27 July 2011, *New system of VET provision;*
- Legislative Decree of 14 September 2011, *Apprenticeship;*
- State-Regions Agreement of 19 January 2012, *Integration of National Register of professional profiles;*
- State-Regions Agreement of 19 April 2012, *Definition of a National System of certification of competences acquired during Apprenticeship;*
- Law 28 June 2012 n.92, *Reform of the Labour Market in a growth perspective;*

(List of European regulations – few citations):

- Resolution of the Council of the European Union of 12 November 2002 on the *promotion of enhanced European cooperation in vocational education and training;*
- Decision 2241/2004 for the *establishment of an European framework for the transparency of qualifications and competences (EUROPASS);*
- Recommendation of the European Parliament and of the Council of 18 December 2006 on *key competences for lifelong learning;*
- Recommendation of the European Parliament and of the Council of 23 April 2008 on the *establishment of the European Qualifications Framework for lifelong learning (EQF);*
- Recommendation of the European Parliament and of the Council of 18 June 2008 on the *establishment of European Credit System for Vocational Education and Training (ECVET);*

- Recommendation of the European Parliament and of the Council of 18 June 2009 on the *establishment of a European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET);*

also considered that

- The designation of ISFOL as National Coordination Point of the European Qualifications Framework;
- The Document titled "*Criteria and procedures for referencing national qualifications levels to the EQF"* as adopted by the EQF Advisory Group;

Provided that

1. The *Europe 2020* strategy is focused on lifelong learning and on the validation and certification of competences. EQF is, therefore, the reference framework for the recognition of individuals' learning paths and working experiences within the European space;
2. Law 28 June 2012 n.92 provides definition of formal, non-formal and informal learning and of the main elements of the national system for the certification of competences;
3. The Italian Government, the Regions and Autonomous Provinces share the purposes of the EQF Recommendation aimed at making EQF the tool for comparing the levels of the national systems, of the qualifications, and for promoting lifelong learning in respect of the diversity of the education and training systems;
4. The first national referencing Report includes those national qualifications issued by public authorities, i.e. by the State, Regions and P.A. in relation to their jurisdiction and role on the matter.

THE MINISTRY OF LABOUR AND SOCIAL POLICIES, THE MINISTRY OF EDUCATION, UNIVERSITY AND RESEARCH, THE REGIONS AND AUTONOMOUS PROVINCES OF TRENTO E BOLZANO

AGREE ON:

1. Adopting the national referencing Report to the EQF as attached to the present Agreement;
2. Referencing the qualifications included in the Report to the 8 levels of the European Qualifications Framework for lifelong learning according to the table named "Referencing Framework";
3. Adopting all necessary measures so as, starting from 1 January 2014, all qualifications issued in Italy will clearly indicate the corresponding EQF level;
4. Promoting and supporting the referencing Report through institutional websites;
5. Authorizing the EQF National Coordination Point to provide the European Commission with all publication data and related support;
6. Providing legally binding translation into English of those Italian qualifications referenced to the EQF as to be more transparent and usable within the European context;
7. Committing on referencing at a later stage to the EQF those qualifications not currently part of the first referencing Report, and specifically:
   - Qualifications issued by Regions and Autonomous Provinces not regulated by State-Regions Agreements;

- Licensed for regulated professions as per Directive 2005/36/EC;

8. Completing the Report with what mentioned in the above point 7 on the basis of a common method and in compliance with the EQF Recommendation and referencing criteria elaborated by the EQF Advisory Group;
9. Proceeding annually with the necessary revision and update of the Report.

THE PRESENT AGREEMENT IS ADOPTED THROUGH MINISTERIAL DECREE AS SIGNED BY THE MINISTRY OF LABOUR AND SOCIAL POLICIES AND BY THE MINISTRY OF EDUCATION, UNIVERSITY AND RESEARCH

The Secretary of the Conference	The President of the Conference
Cons. Ermenegilda Siniscalchi	Prof. Giampaolo Vittorio D'Andrea
(*signed*)	(*signed*)

THE MINISTRY OF LABOUR AND SOCIAL POLICIES

in concert with

THE MINISTRY OF EDUCATION, UNIVERSITY AND RESEARCH

In consideration of

the Recommendation of the European Parliament and of the Council on the establishment of the European Qualifications Framework for lifelong learning (23 April 2008);

the first Italian Qualifications Referencing Report to the European Qualifications Framework (EQF) (20 December 2012);

the State-Regions Agreement of 20 December 2012 deed n.252 on referencing the Italian qualifications system to the European Qualifications Framework for lifelong learning (EQF) in accordance to the Recommendation of the European Parliament and of the Council (23 April 2008);

DECREE that

Art.1

1. Through this decree, the **Agreement** sanctioned within the Permanent Conference for the relations among State, Regions and Autonomous Provinces of Trento and Bolzano (session of the 20 December 2012 deed n.252) on referencing the Italian qualifications system to the European Qualifications Framework for lifelong learning (EQF) in accordance to the Recommendation of the European Parliament and of the Council (23 April 2008) and its annexes (to be considered as integral part of this act) is adopted.

The Ministry of Labour and Social Policies

Elsa Fornero

The Ministry of Education, and Social University and Research

Francesco Profumo

THE NATIONAL PUBLIC CONSULTATION PROCESS ON THE ITALIAN REFERENCING REPORT TO THE EQF

SUMMARY OF THE RESULTS

During Summer 2012 a public consultation on the first Italian referencing Report to the EQF took place with the specific aim of sharing considerations and remarks on the referencing process and its mail results. The national consultation involved different subjects. On behalf of the Ministry of Labour and Ministry of Education, almost all the relevant stakeholders of the vocational education and training sector were invited and specifically the employers' organizations and trade unions, the scientific community, the bigger organizations of VET providers. Moreover, it was an open consultation. The info on it with the invitation to participate was published on the websites the actors involved in the referencing process: Ministry of Labour and Ministry of Education, Department for the European Policies, Regions, Isfol.

The national consultation was a needed step in the referencing process before the formal approval by the Advisory Group as requested for the official presentation; at the same time it proved to be an important opportunity to introduce the EQF, to disseminate information of the referencing process, to share opinions and comments at national level with the relevant stakeholders.

The national consultation has been conducted on line from July 12th to August 17th, 2012. Users interested in taking part in the consultation have been asked to download the Report from three websites (ISFOL, Ministry of Labour, Presidency of the Council of Ministries – Department for European Policies) and to fill in a short questionnaire available on (https://docs.google.com/spreadsheet/viewform?formkey=dFMxRV9tU1Vkd09qM1dvNUpqUE14Unc6MQ)-

The main purpose of the national consultation was to assess the capability of the Report to represent and promote the Italian system within the European context and, more in general, the level of clarity and transparency of the referencing structure.

The questionnaire included an Identity Record to be filled in and the following 6 questions:

1) Do you know, or have heard about, the European Qualification Framework for Lifelong Learning (EQF)?

2) Does the Italian referencing Report to the EQF clearly describe the education and training system?

3) The referencing framework described in Section 3 of the Report shows the correlation between the national qualifications considered in the referencing process and the EQF levels. Is the referencing framework fully comprehensive and exhaustive?

4) In relation to your specific professional context, do you think the EQF is actually useful?

5) Additional comments on the referencing process and on the national Report.

Through the consultation the contents of the Referencing Report have been widely shared, while remarks and comments have been expressed by the main actors and users of the education and training systems, by the organizations representing the labour world, by enterprises and the scientific community, by operators and experts and, generally, by citizens. Round 3000 invitation letters have been sent to participants asking them to take part in the national consultation by filling in the questionnaire. 150 completed questionnaire were sent back.

Main results of the national consultation are as follows:

1) TARGET GROUP

The participants who answered the questionnaire represents all the relevant stakeholders of the VET system. As regards the participants' professional sector, 56% are from the Education sector; 23% come from the Vocational Training sector, managed by the Regions; 5% are representatives from Trade Unions and employers' organizations; 2% from Universities; 1% from Enterprises. The remaining 12% were classified as "other categories"; it refers to consultants, freelance professionals/self-employed, people working in the Regional administrations.

The mentioned percentages show a wider participation by the Education sector and especially from the school sector; the major interest by these actors maybe is linked to the prevailing role of qualifications awarded by the national educations system in the referencing process to the EQF.

2) GEOGRAPHICAL CONTEXT

As for the geographical coverage, the questionnaires arrived from different areas of the country: 39% were sent by South Italy (39%); an almost equal number came from Northern Italy (34%) and the remaining 27% were expressed by VET experts and operators from the central Italian Regions.

3) DATA PROCESSING

Data processing showed an extremely positive feedback on the referencing document and on the entire referencing process. In particular:

- 94% of participants declared that they already knew, or had heard about, the European Qualifications Framework for Lifelong Learning (EQF); so the most respondents are people already informed on the referencing process and eager to participate with their comments.
- According to 90% of participants, the Report describes clearly enough (63%) or very clearly (27%) the Italian Education and Training system; only 10% of participants consider the Report not very clear, having a difficult classification. Actually, many reforms were approved in the last decade, affecting the Education system, so that the resulting picture is not completely clear even for those operating in it.
- According to 90% of participants, the referencing framework in Section 3 of the Report is comprehensive and exhaustive. As for the methodological choices and reasoning supporting the referencing process, 93% of participants consider the Report a positive result and a valuable document;
- Almost all the participants to the national consultation believe EQF to be useful in relation to their professional context (96%);
- 15% of participants considered worthwhile adding comments concerning the referencing process and the national Report. Most comments asked for a wider diffusion of the referencing of the qualifications at the national level and in all sectors so that to enhance the quality of the VET system and support mobility through Europe.

INTERNATIONAL EXPERTS CONSULTATION: FEEDBACK RECEIVED

In response to Criterion 7, stating the involvement of international experts in the referencing process, some international experts were invited to participate to the Italian referencing process on behalf of the Ministry of Labour and Social Policies on collaboration with the Ministry of Education, University and Research. The five experts involved are:

Father Friedrich Bechina – Responsible for international relations of the Holy See for Higher Education

Richard Curmi – Senior Manager at the Department for Evaluation and Accreditation of the Malta Qualification Authority

Claudia Gelleni – Official at the International Centre for educational cooperation – CIEP (Centre international d'études pédagogiques) France;

Adi Edlira Kahani – Official at the Department for the recognition of the qualifications, Division of International Relations and Unesco of the Ministry of Education of Israel;

Jean Philippe Restoueix – Official at the Council of Europe and member of the EQF Advisory Group.

The criteria that led to the identification of the experts were related to their membership of the European institutions involved in the process of implementation of the EQF and Bologna Process, as well as their ability to understand the Italian language. In addition Jean Philippe Restoueix is a member of the EQF Advisory Group, while Richard Curmi and Claudia Gelleni come from two countries that had already completed their referencing process.

The consultation process was carried out in two different phases: first, through a web seminar, held on May 24th, 2012 with the aim of presenting the stages of the Italian referencing process, the methodology adopted, the draft of the referencing Report and the guidelines supporting the evaluation.

On June 13th, was organized a face-to-face seminar in Rome, which was attended, in addition to the international experts, by representatives of the Ministry of Labour and Social Policy, the Technical Coordination of the Regions, the Regions, the ISFOL working group and the EQF National Coordination point. During the meeting, after the comments and feedback of the experts on the Italian referencing Report, followed an interesting debate among the participants.

The key points for the evaluation and the discussion were:

1. Quality of the Report: ability of the Report to represent and promote the Italian system in the European context (readability, clarity and completeness of the document).
2. Quality of referencing: level of clarity and transparency of the referencing system (quality of procedural and methodological choices, and reasoning underlying the referencing process).

3. Comments and suggestions: considerations, possible critical issues or suggestions for improvement.

Quality of the Report

With regard to the ability of the Report to represent and promote the Italian system in the European context, in general, all the experts were unanimous in considering the description of the system very clear and sufficiently comprehensive at all levels. In particular, experts have appreciated the methodological approach used, which outlines the system in all its cycles, and the visualization through the charts, which helps the understanding of the system.

Comments and suggestions have been proposed to improve the readability of the report, especially for international readers, but also in view of the national consultation. In conclusion, for what concerns the ability of the report to represent and promote the Italian system in the European context the advice of experts are:

- clarify the political vision of the Report and its use for the future political strategy of the education and training system;
- include a description of the governance of the education and training system, and a brief history, to make clearer the process that led to the current structure of responsibilities, and places of inter-institutional consultation on education between State and Regions;
- place law references in footnotes or in appropriate appendices;
- expand the study on non-formal and informal learning;
- simplify the language and lighten some parts in order to improve the readability.

Quality of referencing

With regard to the level of clarity and transparency of the referencing system, all the experts agreed on the clarity of the methodological choices and procedures outlined in Section 3. Were very much appreciated informational sheets describing the qualifications laid out in the Annex to the Report and was therefore suggested to include one for each EQF level.

Also in this respect they made suggestions and proposals for improving the readability of the text in relation to the clarity and transparency of the referencing system. In summary, to improve the level of clarity and transparency of the referencing system presented experts recommend to:

- explain the connection with the Italian Framework of the Bologna Process;
- clarify and expand the part relating to quality assurance;
- describe the Italian answers to the 10 criteria and procedures, formulated by the Advisory Group, for each criterion;
- develop guidelines to describe the 8 levels;
- describe more extensively qualifications referenced at levels 1 and 2 of the EQF;
- include information on Europass and ECVET.

Comments and suggestions

All the experts agreed that the Report should give account not only of the referencing technical work, but also of the political will of the Italian institutional actors, reiterating that the main purpose of referencing is to make the national systems of qualifications transparent and use this opportunity to make the educational system of the countries more "attractive" for European citizens.

In addition, they pointed out that it is necessary to include a precise description of the future developments in Italy after the presentation of the Report to the Advisory Group, focusing in particular on the dissemination of the Report and on the outcomes of the process. Finally, to facilitate the understanding of the terminology used, experts suggest to draw up a glossary to be attached to the Report.

In view of the 13th June seminar experts had prepared notes which formed the basis for discussion. Many of the remarks were then acquired, in a new version of the referencing Report that was

submitted to the national consultation. Consequently, the experts were asked to review and update their comments, which are given below in their original full versions.

Father Friedrich Bechina

Responsible for international relations of the Holy See for higher education

The report has been read and examined from the point of view of someone who is working mainly on the global scale of *Higher Education*, with special interest in the issues of recognition, cooperation and quality. All these items are explicitly related to tools like National qualifications frameworks (NQF).

The author is familiar with various Education Systems, and is not inexperienced with the Italian Situation. He has been living in Rome for almost 20 years. At present, he is the Official in charge of these matters at the Congregation for Catholic Education of the Holy See. A good number of the Higher Education Institutions (HEI) of the Holy See is located in Italy and, therefore, the issue pertaining to mutual comprehension of, and comparability between these two systems of Higher Learning is crucial in his daily work.

General remarks regarding the overall quality of the Report:

The Report evokes a good general impression. It offers a valuable and concise introduction to the Italian Education/Training System in all its complexity, and is able to prove that this system is understandable and compatible with the common European Frameworks of learning and qualifications.

In particular, the Report introduces the reader to various competent authorities at the national as well as at the regional levels. It demonstrates, with precise references to the different legal norms, how the system is rooted in the law of the Italian State.

The remarks it provides on the historical and cultural contexts and developments of the System, also facilitate the comprehension of the particularities of the Italian world of Education and qualifications, drawing a quite complete picture of the whole issue and taking into account the different forms of learning, as well as the areas of labor and other possibilities for gaining qualifications and competences.

Where it is necessary or important, the specific situation of private contributions to the relative processes is also well considered and presented.

In this sense, in my opinion, the report fulfills its purpose and; it helps, both those who already know the Italian situation as well as those who are not yet familiar with it, to gain better understanding of this System and to be able to compare it with other national systems in Europe, and even beyond.

Some repetitions (which could have been avoided) make certain parts of the Report more difficult to read. However, with a certain amount of further effort, one will be able to understand the Italian System and compare it with other national systems.

Probably in the near future, an English version of the report could be drafted in order to facilitate a better understanding of some quite complicated formulations. It is suggested to express these formulations in simpler, clearer, more readable terms that retain the same precise presentation of ideas as those found in the original Italian version.

An executive summary and, eventually, brief summaries at the end of the major parts/chapters of the report are highly recommended to make the gist of the contents accessible also to those readers who are not able to go through all of the 130 pages.

General remarks regarding the overall quality of the "referencing":

The goal of the exercise of "referencing" of the Italian System of qualifications against common European frameworks is not to show that everything is the same and not everything corresponds exactly to what other countries offer in the same or in similar contexts. Rather, the said exercise aims at creating both *credibility* and *transparency* of the Italian System within the European context. This goal seems to be quite well achieved in the present Report, which does not try to hide the complexity and particularity of the system and its educational and vocational traditions. This Report helps the reader to understand the system and to learn situating it in a broader context that has been culturally, legally and historically shaped by the developments in the Country.

The Report is not the ultimate tool to overcome the complexities of the System, or to solve some contradictions within it. But it succeeds to constructively live with it. It is an invitation to the reader to learn thinking beyond his own paradigm, and to recognize also the value of something different from what is usual in other systems.

The Report is also good in analyzing the areas, which are not yet sufficiently explored; the overlapping competences, which are not yet clearly defined (e.g., between the national and regional authorities); and the tools, which are still on their way to implementation (e. g., a fully operational National Qualifications Framework). Nevertheless, the hope is that this Report could help in encouraging political decisions, which are still missing in order to build a more complete national qualifications framework, which takes into account the differences and complexities of its components, as essential to the System.

Specific remarks:

General structure, Introduction and Reader's Guide (pages 2-9):

- The three steps, which give structure to the Report (1 = general description of the System; 2 = Mapping of qualifications awarded within the System and 3 = referencing framework) are logically coherent. Even though this structure leads to some unavoidable repetitions, it still helps the reader to orient himself more easily within the complex subject.

- Although the Report is quite long, one could appreciate the visible attempt to keep the document short. Nonetheless, one important consideration could be made in view of making the presentation (especially the introduction) easier to comprehend for readers who are not familiar with the particularities of Italian culture, language expressions, and (educational) traditions.

- The most common problem raised about the first pages of the Report is on the translation of terminologies. On page 8, for example, it is not easy to find the corresponding Italian term for the English word "qualifications". Definitely, neither "qualificazione" nor "qualifica" corresponds to "qualifications", which (also in modern English language) seems to be an "ad hoc" term to define something that is not yet included in the traditional use of the term. In this context, especially in the introductory part of the report, it is difficult to reach a common understanding of terminologies, since some parallel words are used without clear distinctions and without giving the reason why this and not another term is used. This partial ambiguity could have been caused by the fact that the Report is about a situation of different origin, in which certain terms could be used in different contexts and could take on different nuances. It will be very helpful if at least some key notions (like for example: *titoli, qualifiche, competenze, qualificazioni, certificazioni, abilitazioni* ….) could be given explicit definitions (probably best within a glossary). With such definition of terms, it would be possible to examine if the relative words and concepts are used consistently and in the

proper sense (especially if these terms are taken from different documents with different goals and contexts).

- Finally, it is good that the report immediately and clearly points out that it is still a "work in progress". All systems of Education and Training will always remain as such. However, in the current Italian System which encounters challenges, this status is particularly observable.

Section 1, First part: "Il Sistema di Istruzione e Formazione" (pages 11-43):

- At a first glance, the structure at the beginning of this section (1.1; 1.2.; 1.3. and the following subtitles) seems peculiar: 1.1 refers to the competent authorities, 1.2 describes the system as a whole. Meanwhile, 1.3 and the following subtitles refer to single cycles within the system. Both the general description of the system, as well as the explanation of competent authorities are necessary and are very well expressed. However, these two general subtitles could find their suitable place as an introductions to the various cycles of education/formation.

- The introduction regarding the competent authorities is necessary and is very well elucidated in the present report. This gives the reader prerequisite information that helps at giving an orientation regarding a complex system of responsibilities and the corresponding competent authorities in charge.

- Nonetheless, the problem regarding some perceived contradictions remains. It was not the fault of the report. It is just that this complex system is governed by existing legislations in the Country. For those who are not familiar with the Italian system, it is not easy to have a precise comprehension (from the legal point of view) of the difference among various distinctions present therein, e.g., "istruzione obbligatoria" and "diritto-dovere d'istruzione". One can feel that these concepts are products of historical (political) developments, which one day could probably be given a clearer and an ever more coherent form. It could have been useful if more explanations about the pertinent Italian laws, there reasons and (historical) backgrounds had accompanied the report in this case.

- As regards the "first cycle of education" (1.3), it is important and appropriate to give an introductory explanation about the specificity of private education in Italy, defining the difference between the two existing forms: "scuola paritaria" e "scuola non paritaria".

- In the section 1.4, the description of the responsibilities of competent authorities is well defined. It would be helpful if the concept of the "contratto di apprendistato", as well as the relationship between "l'obbligo di istruzione" and "diritto-dovere all'istruzione e formazione" are given clearer explanations. A brief background about the historical or political reasons that gave rise to such distinction seems relevant also.

- Even if the Italian System of professional training is very complex (considering the various distinctions regarding the competences regional and federal authorities), section 1.6 of the Report was able to give a good presentation of the relevant qualifications within this System.

- Regarding the field of Higher Education (1.8), the report was able to describe the Italian System and thus, making this System transparent and comparable with other Higher Education Systems. It would be helpful to demonstrate (at least in a footnote) how the Italian credit systems (CFU = credito formativo universitario; and CFA = credito formativo accademico) correspond to the European Credit Transfer System (ECTS).

- In section 1.10, there is a need to have a more comprehensive definition of the concept of "apprendistato", which is not easily understandable to non-Italians due to a limited (one sentence) and quite vague explanation given to it at the beginning of the section.

- The Appendix: “La validazione degli apprendimenti non formali e informali”, is definitely useful and appropriate. Notwithstanding the good intention to have a brief presentation, the use of a more readable font size for this attachment might be more reader-friendly.

Section 1, Second part: “Le professoni regolamentate” (pages 46-49):

- The whole of the Second part is well done. It gives the necessary complementary information in addition to the description of the system of education/formation. Text and illustrations have succeeded well in providing the readers with a suitable orientation to the complex system of regulations that govern professional training and qualifications, as well as to bureaucratic structure of that facilitates the flow of transactions and the tasks of competent authorities.

Section 2: “Qualificazioni rilasciate nel sistema italiano” (pages 51-69):

- Looking at the general description of the different educational and training systems of Italy, one could say that the second part of the report has succeeded in presenting the various qualifications (awarded by recognized authorities) related to the different forms of education in Italy. It was able to make the complex system and its context transparent and understandable. The graphical overview of these certificates (on page 52), and their respective competent and granting authority is helpful in this regard.

- Section 2 seems to have a clearer and more precise explication than the previous one. This can point to: either a different authorship, or a more structured presentation of arguments given to this section.

- As regards the important initial definition in the first paragraph of page 53 (“La legge italiana … dell’ordinamento didattico nazionale”), it might be more suitable to place this definition directly after title 1 (“Titoli, Diplomi … e Formazione”), and before title 1.1 (“Titoli acquisibili attraverso … di istruzione”), since this definition is related to the subsequent titles.

- Under 1.4, as already mentioned, it could be helpful to demonstrate how CFU corresponds to ECTS.

- The third title of this section (“Qualificazioni rilasciate da soggetti privati”) explains well the need of taking into account all forms of education and qualifications, also those related to a growing private sector. In this context, it is interesting that the report speaks (on page 68) about “private competent authorities”, which could be seen as a special feature of the Italian System that allows “private authorities” or providers to offer education and also, to some extent, to set commonly accepted standards for private education.

Section 3: “Referenziazione all’EQF delle qualificazioni rilasciate nel sistema italiano” (pages 71-111):

- Obviously, the third section is the core of the present Report. It aims at demonstrating the readability, and compatibility of the Italian System with the common European Qualifications Framework. The methodological scheme to distinguish between criteria related to processes, and the technical ones is useful for avoiding repetitions. However, this part could have been more concise. This, and the general task of the making Italian System more transparent could have been easier, if Italy succeeded to officially put into place its National Qualifications Framework, and included this NQF as instrument already in its report. Studying the whole Report (along with its description, graphics, and references), the reader would wonder why – at this stage, where the more complicated work has already been done (and done quite well) – the attempt to put into place the NQF has not been completed yet. It could be easily taken as work in progress just like the report itself. Nonetheless, it would substantially facilitate the efforts in making the Italian System transparent and comparable, as well as in providing a good exercise in referencing the system to the European standards. In that sense, the compliance of crit. 3 remains conditioned and weak. In my

opinion, however, this does not challenge the general value of the exercise, of the Report, and of the proof that demonstrates the Italian System of Education and qualifications is compatible with European standards and frameworks.

- It is regrettable and at the same time understandable that (as stated and explained on page 78) the qualifications under regional authorities were not fully discussed in this exercise. In my opinion, making these qualifications visible in the Report and providing appropriate explanations regarding this arrangement could have been helpful for a better understanding of the strengths and weaknesses of the national system, which these regional authorities do not challenge but provide supplementary support. Today, even if many systems centralize competences, especially in the labor market, keeping regional authorities in the scenario, and letting them develop qualifications according to the regional and local needs could also have real advantages. But again, this would strongly call for a National Qualifications Framework or other useful tool to facilitate clearer comprehension and comparison of the different types of qualifications and the various competences within and outside a particular country.

- Regarding the criterion 6 (quality assurance), a weak point of the Italian system today (and probably also of the Report) is demonstrated by the fact that the Report does not always clearly mention which provisions or instruments for quality assurance are already legally established and/or fully operational, and which ones are still part of future plans for the system.

- Some questions remain regarding the role of "competent authorities" in "assuring" the "quality" of Higher Education Institutions (cf. for example page 95). In line with general developments in European and global Higher Education policies, seems not to be enough that a "competent authority" issues an approval or certification of accreditation to fulfill the purpose of "quality" assurance. On one hand, one cannot deny the necessity and importance of the responsibility of the competent authority towards the quality of education and qualifications. On the other hand, there is more to it when we speaking about quality assurance. Nowadays, it has become evermore a standard of practice for (educational) systems to create their own procedures, mechanisms and tools to promote and maintain a "culture of quality" and quality enhancement which means explicitly strengthening the responsibility of the institutions themselves. Due to the fact that these issues are still under discussion in Italy, it seems that the Report does not give enough critical distinction between these two basic aspects involved in QA. The two aspects of quality assurance should be distinguished according to two key-concepts: "*accreditation*", i.e., the examination and certification of minimum standards; and "*quality promotion*", i.e., the expression of a quality culture under the responsibility and cooperation of all relevant stakeholders, who set standards of expectations (cf. page 109-110).

- Regarding level 7 of the EQF (page 86), some qualifications, like "master universitario", are classified in level 7. However, a student could acquire this qualification without fulfilling all the conditions of a typical level 7 qualification (like a "real" "Master"), and without giving the degree holder access to a specified higher cycle/level of qualifications. This creates a certain ambiguity. In other systems, these qualifications could be classified under level 6. It will be important to unambiguously assign a suitable place for these qualifications within the future Italian NQF, giving it clear definitions. The term "master" should be avoided in the future since it creates a lot of misunderstanding in the international context.

- In comparing both European Qualification Frameworks (the EQF for LLL of the European Commission) as well as the Overarching Qualifications framework of the EHEA with the Italian System (Cf. page 05), the R eport speaks about "equivalence" to demonstrate the compatibility of these Systems with that of Italy. The term "equivalent" does not seem to give the precise relationship between the two overarching frameworks. Taking into account the long discussions on

European level and the great efforts put into this question by the Council of Europe and the relevant authorities of the EU, it is more suitable to use the term "compatible".

Richard Curmi

Senior Manager at the Department for Evaluation and Accreditation of the Malta Qualification Authority

Overall Comments

The Italian Referencing Report is a comprehensive report which covers in great detail the Italian education system from compulsory education to higher education. It deals with the various progression routes and the diverse awarding institutions and the nationally recognized qualifications and this in a very detailed manner that simplifies and facilitates the understanding of such qualifications and systems to both the foreign reader and also to all those who are not familiar with the Italian education system. The draft referencing report also gives a thorough explanation of the referencing of the major Italian qualifications to the European Qualifications Framework.

The referencing report systematically explains the purpose of such a report and gives an introduction to the EQF process before explaining in a very detailed manner the different cycles that make up the education system in Italy. The diagrams illustrated for each cycle also help to facilitate and help the individual unfamiliar with the Italian education system to be acquainted better with the educational journey an individual part of this system needs to take. In the section dedicated to the Italian system, the report also deals with professional qualifications, lifelong learning and explains some best practices occurring in the different regions when it comes to the validation of informal and non-formal learning. As already mentioned earlier this report deals with the national accredited qualifications. This is a first step towards the harmonization of the qualifications in Italy and referencing such qualifications to the EQF. The report indicates that regional qualifications will be addressed in a future update of the Referencing Report. This would be very important for a country like Italy, both for mobility reasons within Italy and also beyond the country. It would have been of benefit to the reader if more information was given about the different regional qualifications and the recognition of such qualifications beyond the regions. The future update should definitely include such a section.

The last part of the referencing report deals with the referencing criteria and very clearly illustrates the EQF levels for all the different qualifications considered in this report. Again the way these qualifications are presented and broken down in the following criteria: a) title of qualification, b) EQF level, c) entry requirements, d) Learning Outcomes, d) Competent awarding authority help the reader to better understand the specific qualification. Finally, the report indicates the various stakeholders and their involvement in the development of this report. Maybe more could be said about stakeholder involvement and also the impact of the referencing of qualifications on all social partners and stakeholders in Italy.

On a last note before actually delving into more detail about the overall comments above mentioned, this report augurs well to the harmonization of all qualifications that are part of the Italian academic and vocational systems and for all forms of learning. A very well done!

1. Quality of the Report – The Italian education system

Contextualisation of the Italian Education System and developments

The referencing report gives a detailed exploration of the Italian education system which guides the reader to understand the Italian context. The European education system reforms are also adequately referred to. The priorities and relevant policy developments are referred to and discussed to contextualize the ideologies behind the referencing process. Policy reform is being based on the principles of European Education Reform, such as linking to the better compliance of education to labour market needs. As mentioned previously this report has delved into the different national recognized qualifications that are part of the Italian education system. Furthermore, the chronological information of the different cycles that make up the Italian education system are very well described and answer all queries that could arise when trying to understand a national system of education. As previously mentioned the diagrams further illustrate the progression from one cycle to the other and hence help the reader to better understand the educational journey in Italy. This section in the report also deals with continuous learning and regulated professions and so gives a full picture of the various methods and systems that are part of the educational system in Italy.

This referencing report would in future need to further delve in the different qualifications provided at regional level and explain further the importance of such qualifications, their recognition status and also the methodology behind the development of such qualifications. This is quite important especially for certain vulnerable target groups such as the low skilled and migrants. It is not clear if qualifications acquired in one region are recognized in all the other regions.

Validation of Informal and Non-Formal Learning (VINFL)

VINFL has been tackled in Section 1, chapter 3. The notion of valuing learning irrespective of the learning context within which it was achieved, is sufficiently strong in this chapter and is discussed in different contexts. It is clearly indicated that VINFL is practiced at regional levels and some best practices are discussed. Again, as with the regional qualifications further explanation would in the future be required as for the reader to better understand the esteem such a system enjoys beyond the different regions and also on a national basis

Stakeholders' Involvement

The referencing process was steered by researchers from ISFOL, the Ministry of Employment and Political Sciences and the Ministry of Education, Universities and Research. The report was discussed with the different regions and the social partners. As previously mentioned in the overall comments, the stakeholders' involvement needs to be given more importance and further explained as to what extent the different sectors from Industry have been consulted. Furthermore, the anticipated impacts of the implementation of what such a process might have on the different target groups (educational institutions, employers, employees, government, voluntary organizations) should also be delved into as these would be of great benefit to the reader unfamiliar with national and European qualifications frameworks.

2. Quality of the Referencing Process

Referencing the education system

The referencing process consists of three stages, which include the analysis of the all educational systems followed by the mapping of nationally recognized qualifications and, finally, the use of the 10 criteria of the EQF.

Referencing Criteria

The referencing criteria of the EQF are addressed in detail and respond to the demands of the process. Comments on the different criteria are tackled through the various points raised throughout the last section of the report.

Progression Routes

The education system of Italy described in section 1 shows that the system itself is already shaped to allow possible progression routes between different forms of education. Progression routes in higher education are also clearly defined in explaining the various forms of access paths.

Key Competences

The description of basic education aims, show a strong element of development of key competences of learners. It shows that the basic education levels are in fact geared towards recognizing the substantial need for learners at the lower levels to develop these key competences whether for educational progression or for employment.

Level Descriptors

Level Descriptors for different qualifications or professions are indicated in the last part of the report. However, it is unclear what the levels 1 and 2 include. Maybe more guidelines should be given, especially if the regions would need to reference their qualifications.

Qualification Types

There is reference to titles of qualifications when discussing each EQF Level. This further triggers the referencing process by not making it an empty one and also making it already in practice.

Credit Systems

In academic HE, the ECTS system is implemented there is also mention of the ECVET system or at least the capacity to incorporate this development in the future.

Description of HE

Higher education levels are described in a thorough manner. There is also a description on the different qualifications on the higher levels of the EQF. These level descriptors also correlate to the EQF level descriptors widely, despite being separate.

Quality Assurance (QA)

The QA system is sufficiently described and seems that new systems have been in place as from 2012.

3. Concluding Remarks

The Italian referencing report is a forward-looking policy tool. It records what has been achieved so far in lieu of the concepts being put forward. Obviously as with other referencing reports, this is a work in progress and would clearly need to be updated every year as to reflect the education system and the labor market demands in the country.

As mentioned throughout my comments, I believe that the update of this referencing report should further include

- Better guidelines for the regions with regards to level descriptors and this especially on the lower levels
- A chapter dedicated to stakeholders' involvement and the impact of such a process on the different stakeholders and social partners.
- A better description of the regional qualifications and the status of their recognition beyond the regions
- Further developments on the status of the validation of informal and non-formal learning and the recognition of such learning beyond the different regions.

On a final note, this referencing report has been overall comprehensive and a very good piece of work. I hope and wish that the update of this report will achieve its aim in having more qualifications in Italy referenced to the EQF as for such qualifications to enjoy a European and global currency and this to the benefit of all.

Claudia Gelleni

Official at the International Centre for educational cooperation – CIEP (Centre international d'études pédagogiques) France

1. Quality of the Report

The report as a whole is clear and complete. The three sections are structured logically and coherently, understandable from an external who is not accustomed to the Italian system, as it goes from the general to the specific. Nevertheless, the readability varies between the three sections and some inconsistencies were detected between one part and the other. The first two sections are legible and clear, the third one is more complex, while remaining legible.

2. Quality of referencing

The procedural and methodological choices are consistent, clear and well laid out, except for the point about the future developments of the framework. The system of referencing and referencing reasoning are transparent. The technical criteria relating to the principle of learning outcomes, the consistency of the level and quality assurance, are clearly analyzed and well applied to the qualifications examined and included in the synoptic. We note, however, the absence of an explanation of the qualifications related to the first two levels of the framework.

3. Comments and suggestions

Section 1 - THE SYSTEM OF LIFELONG LEARNING

The first section describing the Italian educational system as a whole is clear and comprehensive, anyway it would be appropriate to clarify the following:

- When we speak of vocational schools and their new five-year path system it implies a knowledge of the previous system. This part should be clarified, explaining in particular the relationship between the school and the vocational training and the possible transfers between school and vocational training. Although the role of regions has been defined in the first part when speaking of governance, it should perhaps be reiterated in this chapter. Being an Italian specificity, may not be easily understood by a reader who doesn't know the system.

- The table on the 2nd cycle includes the single-cycle "master's degree" courses. It should be noted that for courses in architecture and law there is also a 3 year degree course that for architecture can give access to the regulated profession of "junior architect" (also mentioned in the chapter on regulated professions). In the same chapter should be made clear that, despite the official name following the decree of 2004, is *laurea magistrale* (master's degree), the appellation *laurea specialistica* (lit. specialistic degree) is still widespread used. For more in table identifying the 3 cycles, in the 2nd cycle is called *laurea specialistica magistrale*.

- It should be clarified whether the qualifications resulting from the system of adult education will be included in the Italian national framework and then referenced to the European one, if not possible, perhaps the description of this part could be more concise.

- Although it's clear the explanation of the three types of apprenticeship, it should be clarified and simplified the paragraph concerning the references to the EQF process.

- With regard to private certifications that cannot currently be inserted in a national certification framework, the presence of this part is informational only, but can confuse the reader.

Section 2 - QUALIFICATIONS AWARDED IN THE ITALIAN SYSTEM

The mapping of qualifications awarded in the system of education and training is complete and clear. However, some remarks are appropriate:

- There is an inconsistency in the description of the titles from the old system related to the first cycle. This group included the degree that in Section 3 is then referenced as belonging to the second cycle, ie at level 7. The bachelor's degree from the old system should rather be included in the titles of the old system related to the second cycle: they were in fact long cycle degrees that gave access to the doctorate (on competition), in contrast to the old system or university degree Diploma Sdafs (short cycle degrees). It would be also useful to mention for the bachelor's degree under the old system the decree of equivalence of the old system with the master's degree.

- The *laurea specialistica* is defined as a title of the old system, which may suggest a system pre-Bologna Process and could be confusing, while this degree is already part of a first wave of Bologna reforms.

- It would be appropriate to summarize the section on licensing for regulated professions.

Section 3 – REFERENCING QUALIFICATIONS AWARDED IN THE ITALIAN SYSTEM TO THE EQF

Choices and procedures for the inclusion of qualifications in the national framework are clearly analyzed and explained. However, some remarks are appropriate:

- The section entitled "Future development of the referencing framework" would find a more proper place at the end of this paragraph, just after the descriptors. In fact, it is a working hypothesis, while what included before and after it is a working methodology and an already implemented procedure.

- It would be useful to include in the Annex a descriptive sheet also for level 8.

Adi Edlira Kahani

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The working group preparing the referencing Italian qualifications to the EQF has done an enormous work, involving partners on national level (relevant ministries involved in the process). Below I will try to underline and comment the report as I see it, in the three aspects we were asked to:

1. Quality of the Report

The Italian system of education was clearly described with regard to the levels, supervision (be it state or regional, etc.), group age for each level and the final diplomas achieved, in words as well as graphics. However, the report indicates that:

- All professional and continuing education (typology and diplomas) are too detailed, while other stages of education system are shortly described.

- There are too many national and regional regulations and laws, while it is not clear their relations with the EC regulations and directives.

In order to make understandable the system of education to everyone outside Italy, it would be appropriate adding a greater effort to the synthetic part related to the professional education and training (VET) which, even if based and supervised on regional systems, it should be explained in a more generic way, to enable those who are not expert of the Italian system of education, to be able to have a general idea of the types of qualifications in this area: as with other QFS, it is recommended to bring their skills to regional macro types, which will then bind the qualifications issued by the regions.

2. Quality of referencing

- Italian HE short description, does not mention the Dublin Descriptors, even though the Higher Education system has met them and I don't know why regulated professions cannot be as continuation of this part of the report (since a regulated profession is mostly based on an academic degree or vocational education, requiring also an academic validation).

- Italian referencing to the EHEA QF is one of the most successful in the EHEA; therefore it should have taken more space on the report. It makes the Italian HE system more compatible to the EHEA QF (therefore ensuring the coherence between the two meta-frameworks EHEA QF - EQF), promoting the Italian HE, increasing the international mobility of students and graduates, employability, facilitating the process of recognition and evaluation. The QTI already referred to the Bologna Process (http://www.quadrodeititoli.it) should be included.

- In regard to the ten criteria for the referencing process, as mentioned by the report of the working group I would, at a glance, define them as follows:

✓ **Criteria 1**: There is a clear explanation of the responsibilities of the national agencies/Ministries and regional ones, their legal competences determining their involvement in all the levels of the system of education.

✓ **Criteria 2**: All levels have a clear and demonstrable link. The graphics show it clearly. (in regard to diplomas referring to EQF level 4, please see my notes in this document).

✓ **Criteria 3**: The NQF is based on the principle and learning outcomes, while for the future, please refer to the opinion expressed in this report to the professional education and training (VET).

✓ **Criteria 4**: Involvement of authorities on national and regional level (members of the working group from different authorities), makes the process of qualifications in the NQF transparent. Still some levels of the education system are shortly described, and I think adding more to that specific part (especially higher education), will make it more understandable to not Italians.

✓ **Criteria 5**: Coming from a country outside the EU, it is hard for me to see the linking between the NQ and EU agreements/regulations/recommendations.

✓ **Criteria 6**: It seems the criteria have been met on involvement of National authorities/Ministries, while lacking the involvement of regional ones.

✓ **Criteria 7**: The involvement of international experts and their input will assure that their advice, suggestions and discussions in certain aspects of the report will be taken into account, for further proceeding, producing at the end a report which can clearly give a picture of the entire system and its referencing to the EQF levels.

✓ **Criteria 8**: ISFOL as the National Contact Point is in charge of this.

✓ **Criteria 9**: not relevant to this evaluation

✓ **Criteria 10**: to be met by the National competent authority in charge of the process.

3. Comments and suggestions

While presenting my compliments to the entire working group for the enormous efforts and tremendous work done on writing the presented report, my suggestion is that while writing the report, it should be kept clearly in mind the purpose of the QF, which is primarily descriptive of the system of education, in order to understand present qualifications in a country: if this description is not synthetic, then it will hinder this purpose and will not be able to describe in a uniform system of education. If the QF fails to describe the system, the qualifications will have difficulty on being understandable during the procedures of recognition abroad and professionals and students who want to pursue and purchase a qualification in Italy will not fully understand the system of education, so the country becomes less attractive.

Jean Philippe Restoueix

Official at the Council of Europe and member of the EQF Advisory Group.

The second version of the report answer to a number of questions and comments made during the meeting of the experts group held in Roma in mid June.

The Italian QF is a transparency tool of a complex and fragmented system; transparency which can be used both on national level, to stress the cooperation between the different stakeholders, and for foreigners, as a way to make more understandable the whole system. It describes a complex situation mainly due to the different levels of responsibilities between State, Regions and Universities and the report clarifies the different lays of responsibilities.

To make the general picture even more complex, the state of development between the different regions is extremely diverse. Therefore the focus on p.38-41 is very useful and informative both as it clarifies the different developments within the different regions and presents one of the very interesting aspect of the Italian QF the “qualification Booklet” as a tool for recognition of formal and non formal learning, including the validation of NGO experiences, including youth NGO ones.

The report is very clear for each level on how the quality is guaranteed and the mechanisms used to implement it (including in terms of legal frameworks)

The report also present the different part of the education system (for instance the Arts and Music education one) but could be more explicit on how it is possible for someone to move from one system to another.

The link with the Bologna QF could be more explicit, even if the second version of the report gives more precise information about higher education qualification and the different levels of

qualifications. In the same line, the use and implementation of learning outcomes could also be more clear but as we know this is a challenge not only for the Italian QF.