

Executive summary of the Torino Process 2016–17 Uzbekistan report.

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Acronyms

ALs Academic lyceums

CSSVE Centre for secondary specialised vocational education

GDP Gross domestic product

SSVE Secondary specialised vocational education

VCs Vocational colleges

VET Vocational education and training



TORINO PROCESS 2016–17 UZBEKISTAN

EXECUTIVE SUMMARY

1. Introduction

The progressive advancement of Uzbekistan along the path of democratic reform and sustainable development during the period 2015–2016 was the result of decisive steps taken in implementing fundamentally important reforms. These reforms were aimed at achieving the same conditions as those in developed democratic countries, with a strong, socially oriented economy that provides a decent standard of living and quality of life for the citizens of the country.

In general, Uzbekistan's policy on vocational education and training (VET) in the period 2015–2016 has had a greater emphasis on improving the quality and content of education and training, along with the consolidation of the material and technical base of the sector, i.e. construction of vocational colleges (VCs), further improvement in terms of providing educational institutions with modern teaching and laboratory equipment, and increasing the number of well-trained professional teachers.

The vocational training system, which was designed for an industrial period in which there was intensive development in a non-competitive environment, has been fundamentally changed.

Specific measures will be taken in the field of education with the aim of training a new generation of creative and scientific intelligentsia¹.

The key conditions for development of the VET system in Uzbekistan during 2015-2016 were:

- a vision for the national VET system that addresses issues relating to the improvement of the legislative framework and the achievement of comprehensive national development goals aimed at increasing competitiveness and improving the development of vocational education;
- effectiveness and efficiency in meeting the demands of the economy and the labour market for vocational education, where the economy and the labour market are the key factors defining the demand for skills profiles, and mechanisms are in place for determining demand, and for coordinating supply and demand for qualified labour and the output of the VET system;

¹ Shavkat Mirzieev, President of the Republic of Uzbekistan at the solemn session of the Oliy Majlis of the Republic of Uzbekistan, 14 December 2016.

- effectiveness and efficiency in meeting the demographic and social demand, as well as the requirements of social integration (inclusion), addressing issues relating to the impact of demographic and social factors that shape the demand for VET services, and taking into account the VET system's potential to effectively respond to these factors in order to ensure an inclusive approach to teaching and to meet the needs of students in terms of professional and personal progress;
- internal efficiency of the VET system: reviewing the quality assurance of teaching outcomes in the VET system and ensuring continuous improvement;
- management and policy implementation practice: analysing the VET system in relation to methods and decision-making levels, the distribution of functions and powers, responsibility for improving the quality of VET, introduction of the processes of modernisation and diversification which improve the efficiency and quality of secondary specialised vocational education (SSVE) across the country, increased support for educational institutions and improving the professional quality of teachers; a further area of development is to increase the employability of VC graduates.

The level of cultural and educational development of Uzbekistan in the period 2015–2016 has defined the state of the country's economic prosperity.

Among the urgent problems for the development of the education system was its capacity to meet cultural development needs, and to resolve the problems, which are periodically experienced not only by the national education system, but also by the entire global system.

Stable development in the period 2015–2016 and the entry of Uzbekistan into the world community have taken economic and cultural relations with foreign countries to a new level. All spheres of the national economy and spiritual life have flourished as a result of the improvement in the business climate, which is positively reflected in the business environment indexes of international economic organisations (Mirzieev, 2016).

In 2015, the economy of Uzbekistan grew by 8% and continues to grow at an acceptable rate. In line with the implementation of modernisation programmes for industry and infrastructure, by 2030 the index of gross domestic product (GDP) will have doubled. The agro-industrial sector will be reformed, and the development of the service and small business sectors has already begun to make a significant contribution to the country's GDP, promoting the improvement of vocational education in specific directions (Mirzieev, 2016).

Future challenges for the further improvement of the SSVE system under the Torino Process are:

- the use of advanced mechanisms in the development of short- and long-term programmes for the development of the SSVE system in Uzbekistan;
- the introduction of advanced educational methods into the country's SSVE system.

2. Main findings

Overview of VET and vision for VET

The national model for the system of continuous education and for developing well-rounded young people in Uzbekistan is aimed at creating a strong workforce for today and tomorrow. This means educational and professional programmes in a life-long learning perspective developing cohorts of active, purposeful young people with multi-faceted talents, high moral standards, and the most advanced knowledge in the required professions, who are aware of their responsibility to society, the state and the family, and are able to adapt to life in today's dynamic world.



The main priority for the development of an advanced system of vocational education is to formulate a strategy for a national model of education and vocational education modernisation. This should take into account modern requirements in terms of production prospects for the technological development of the economy and increased productivity, as well as the development of an independent quality assessment system for educational and scientific activities in the priority sectors of the economy to ensure the objectivity and transparency of evaluation results to the wider public.

In the course of its implementation, radical changes have occurred, not only in the form but also in the very essence of education, which has moved to a continuous model. The transition has been made to 12-year compulsory education, which consists of nine-year general secondary and three-year SSVE, and this is unparalleled in international educational practice.

SSVE has become a fundamentally important new link in the chain of continuous education. Educational institutions of entirely new types have been created – VCs and academic lyceums (ALs) – in which graduates of the ninth grade enrol.

The system of secondary and SSVE, which primarily covered the needs of the economy, focused on the production of competitive products and the need for young people receiving basic education to start work in enterprises already trained, with a specialism, and knowing the basics of the production process.

Students at VCs not only improve their knowledge on general subjects but are also trained in professions that are in great demand on the labour market.

The lyceums perform an important function: students receive general education, in greater depth, with an academic bias, and study disciplines of a relevant profile.

Students who graduate from ALs and VCs have a sufficient level of knowledge to enter higher educational institutions/universities and continue their education in their chosen specialism.

Postgraduate education, advanced training and retraining of personnel form the basis of continuous education.

The legal, personnel, material and technical, substantive base (educational standards, curricula, programmes, textbooks and teaching materials, new pedagogical and information technology) have been elaborated for the establishment and operation of an integrated system of SSVE.

The Uzbek model of personnel training in the education system is unique in terms of the breadth and depth of its coverage, its scientific validity, and the participation of the whole society.

The main distinguishing feature of the National Programme of Personnel Training in Uzbekistan is its integrated, systemic approach, in which the components of a single process are the individual, the state and society, continuous education, science and industry.

The staged implementation of measures to improve the education system as a single training, research and production entity – focused on training highly skilled, competitive staff for all branches of the economy and areas of life, in order to ensure the effective integration of education, science and industry, the spiritual and moral education of young people on the basis of national and universal values, and the development of mutually beneficial international cooperation in the field of personnel training – has contributed to:

 development of state/public organisational and economic mechanisms for vocational education system management;



- formation of a system of independent assessment of the quality of vocational training, including the assessment and certification of graduates' qualifications;
- development of a system of retraining and advanced training for vocational education teachers in order to build human capacity for modernisation;
- creation and development of management mechanisms to ensure the inclusion of the vocational education system in solutions for enterprises' human resources problems;
- strengthening of the participation of regions in the comprehensive modernisation of vocational education;
- creation of the system of professional guidance for young people, aimed at changing society's attitude to blue-collar occupations, technical areas of training, and complex, knowledge-intensive occupations;
- updating of the content of vocational education on the basis of professional standards, with direct participation from employers' associations;
- development of educational-methodical and science-based provisions and recommendations for improving the content of the updated vocational education standards on the basis of the professional recommendations of employers' associations.

Under the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan of 14 April 2014, the decision on the organisation of the Information and Methodological Support Service for SSVE institutions was adopted. The main objective of this service is to ensure the centralised supply of methodological manuals to secondary and SSVE institutions.

Effectiveness and efficiency in addressing economic and labour market demand

Businesses have provided significant support to the SSVE system. During the period 2015–2016 there was a high level of economic activity in relation to the implementation of programmes aimed at improving employment and employability. Businesses have also become stronger actors in the reform process, particularly in relation to:

- elaboration of new professional requirements (standards) for emerging vocational education sectors (education, learning, assessment and career guidance) in the SSVE sector;
- support rendered by the state and local management authorities to the vocational education sector;
- development of small businesses and entrepreneurship in the vocational education system.

As a result of the modernisation of the economy, through which the competitiveness and export potential of Uzbekistan was improved, in 2015–2016 there was a further reduction in state involvement in the economy and private sector development. This contributed to the development of such state programmes as Service industry development programme for 2012–2016, Programmes of development and modernisation of engineering-communication and road-transport infrastructure in the period 2015–2019, and Programme for the creation of job places and for ensuring employment of the population in 2017. The programmes are aimed at increasing the employment of the population through the mobilisation of available resources and reserves in different sectors of the economy and different areas of the country (Mirzieev, 2016).

The heads of khokimiyats (municipal governments) at all levels and of economic management bodies, enterprises, relevant ministries and agencies are assigned specific tasks on unconditional support in



achieving job-place creation and viable solutions for enhancing employment and, on this basis, in further increasing incomes and the level and quality of people's lives. Additional measures have been developed to ensure the employment of young people, especially graduates of VCs in the 2016/2017 academic year (Mirzieev, 2016).

Special work has been undertaken on the appropriate distribution of vocational education in rural and urban areas, as well as on the development of comprehensive vocational qualifications, in line with the profound structural changes that have occurred in agriculture and with the accelerated pace of development of such branches of agriculture as horticulture, gardening, viticulture and livestock².

In 2015, systematic work continued on ensuring the dynamic development of the service sector as one of the most important factors and trends in deepening the structural transformations and diversification of the economy, and increasing employment, incomes and quality of life. Particular attention has been paid to the development of this sphere in rural areas. Over the past three years, under the Programme on accelerated development of the service sector in rural areas, more than 22 800 projects were implemented in villages. The volume of services increased by 1.6 times, and their consumption per villager by 1.5 times. The vocational education sector is very closely linked to the labour market, and mechanisms to allow a flexible and rapid response to changes in the labour market have been created and implemented in order to ensure the successful transition of students from education to stable employment. Alongside this, systems of professional orientation for young people have been established. These aim to change society's attitude to the blue-collar jobs, technical areas of training, and complex, knowledge-intensive occupations. Closer cooperation between management structures has been achieved. In 2015, a 'four-sided contract' (student-employer-khokimiyat-college) was developed to reinforce the responsibility of local authorities (khokimiyats), the Ministry of Education, the Ministry of Labour and the Chamber of Commerce at local level³.

Effectiveness and efficiency in addressing demographic, social and inclusion demand

Gender equality in education at SSVE institutions is guaranteed by the Constitution of the Republic of Uzbekistan. According to the Law 'On education', adopted in 1997, men and women have equal rights to education and choice of profession.

There is no evidence of gender inequality in the system of continuous education in Uzbekistan, as the state focuses on the coverage of girls' training at ALs and VCs. To this end, the enrolment of girls has increased in such professions as knitted-garment technologist, seamstress, cook, fashion designer, hair stylist and master of decorative art⁴.

Equal distribution of vocational education across rural and urban areas is important, since more than 60% of the population live in rural areas⁵.

Great importance is attached to the strengthening of the industrial processing of agricultural raw materials and the development of storage infrastructure for crops⁶.

There is an urgent need for the distribution of students by area of specialisation, with the introduction of service and processing specialisms into rural areas, along with ad hoc agricultural specialisms

⁶ World Bank, op. cit.



² World Bank, Doing Business rankings 2015.

³ I.A. Karimov, first President of the Republic of Uzbekistan, Results of development in 2015 and perspectives for 2016-2017.

⁴ Ibid.

⁵ Ibid.

During the period 2015–2016, the system by which students choose the language of their training and educational institution was improved. The Constitution of the Republic of Uzbekistan guarantees everyone equal rights to education, regardless of gender, language, age, race, national origin, creed, religion, social origin, occupation, social status, place of residence, and length of residence in the country (information from the Centre for SSVE (CSSVE), 2016).

The choice of language of education and educational institution is given to students and/or their parents. In practice, the selection cannot necessarily be based on ethnic origin. For example, many children from Uzbek families are enrolled in schools where teaching is carried out in a language such as Russian, Tajik or Kazakh. Turkmen, Kazakh, Tajik and Kyrgyz students study not only at schools where education is provided in their own languages, but also at schools providing teaching in Uzbek or Russian (information from CSSVE, 2016).

During this period, progress has been made in the effective integration of children with disabilities into mainstream education. In order to provide access to SSVE in remote rural and mountainous areas, 28 branches of VCs were established and in some VCs, hostels with special facilities for children with disabilities were built. Based on Government Resolutions No 100 of 17 May 2007 'On the organisation of the activities of specialised vocational colleges for persons with disabilities' and No 243 of 9 June 2013 'On further improvement of the activities of specialised colleges for persons with disabilities', four specialised VCs in Tashkent city and two in Samarkand and Fergana have been opened and are functioning. These currently train more than 1 500 students with visual impairment, hearing loss, musculoskeletal disorders, general diseases and mild learning disabilities, in accordance with the list of specialisms and professions.

To date, 5 000 teenagers with disabilities (including hearing impairment, visual impairment, musculoskeletal disorders and common diseases, and mild or moderate learning disabilities) are studying at VCs and ALs in Uzbekistan. Out of the total number of students, more than 1 500 are educated at specialised VCs for persons with disabilities.

The annual Resolution of the Cabinet of Ministers 'On admission to secondary specialised, vocational educational institutions in the Republic of Uzbekistan' pays special attention to the creation of conditions and guarantees for the right to choose an educational institution for children with special educational needs.

Internal efficiency of the VET system

The CSSVE plays a key supervisory and coordinating role in vocational training, including the development and implementation of national educational standards. It also provides educational programmes and training in line with labour market demands, organises the equipping of educational institutions with modern teaching and laboratory equipment for classrooms of general educational subjects, special courses and workshops with educational production lines, as well as the training and retraining of teachers.

State educational standards have been developed and implemented for 20 general educational subjects, 240 junior specialist professions at VCs, five areas of education at ALs, and more than 2 000 educational programmes, including curricula for general, general professional and special subjects at VCs and advanced general education at ALs (information from CSSVE, 2016).

There is a well-organised system of training, retraining and advanced training of teaching staff in all types of education. There are functioning higher educational institutions and VCs for pedagogical profiles, as well as institutes for the retraining and advanced training of teachers in all regions of the country.



The system of advanced training for teachers is being upgraded in order to take into account the individual needs and interests of teachers.

It should be stressed that for all levels of education in Uzbekistan, new state educational standards and curricula – including multimedia, as well as textbooks and educational manuals, which are published in their millions – have been developed and implemented to meet current requirements. Advanced educational technologies and interactive teaching methods are widely used. Each educational institution has its own information and resource centre with a large amount of educational literature, including in electronic form. All this creates appropriate conditions for acquiring high-quality, deep and versatile knowledge.

The structure of postgraduate education is actively developing. At higher educational institutions, there are about 30 specialised boards for defending PhD dissertations in 70 areas and doctoral dissertations in 37 areas. The number of young, talented scientists – recent university graduates with a scientific degree – is increasing every year.

Attention is also being paid to the improvement of professional skills and retraining of professionals who are already working, both in specialised educational institutions and in companies. Increasing requirements regarding the quality of products and their competitiveness in domestic and foreign markets and, at the same time, demands to reduce production costs make it necessary to continuously update technologies and to introduce more advanced production methods, the effectiveness of which is primarily dependent on the personnel and their knowledge and skills.

With the aim of supporting the development of the education and training system for entrepreneurship activities and training of entrepreneurs, the Chamber of Commerce, together with the Ministry of Higher and Secondary Specialised Education and the Ministry of Labour and Social Protection of Population, is working with the European Training Foundation to develop a national qualifications framework.

The State Testing Centre under the Cabinet of Ministers of the Republic of Uzbekistan has a crucial role in SSVE, namely the formation of an independent quality assessment system for vocational education and alumni qualification certification in line with the needs of the economy, oriented towards young people who have received basic education in general disciplines, have gained a profession in one of a number of specialisms demanded by the labour market, and possess the practical skills required to dealing with basic manufacturing processes.

At the same time, the State Testing Centre is responsible for ensuring that once they have graduated from ALs and VCs, students have a sufficient level of knowledge to enter a higher education institution and continue their education in their chosen specialism.

The centre is also responsible for the development of the system of retraining and advanced training of vocational education teachers.

Governance and policy practices in the VET system

Under the Resolution of the Cabinet of Ministers of the Republic of Uzbekistan of 14 April 2014, the Information and Methodological Support Service for SSVE institutions was created, the main task of which is to develop recommendations on:

- application and implementation of best practices to further upgrade the quality of knowledge and improvement of youth training;
- providing educational and laboratory equipment and educational production lines for general education classrooms, specialist courses and workshops;



- developing a systematic approach to cooperation at all levels of VET between the main ministries and agencies;
- balancing vocational training provision;
- creation and implementation of mechanisms to ensure a flexible and rapid response to changes in the labour market;
- expansion and strengthening of international relations.

Public expenditure on education increased in the period 2015–2016, and any increase in support for continuing professional training may require further funds from public and private companies. Currently, about 35% of the state budget is allocated to education, and this is divided into the following elements⁷:

- budget expenses for the education and training of personnel (excluding investments and the cost of salaries and supplies);
- budget expenses for investments (for example, the construction of schools, the purchase of equipment);
- extra-budgetary funds.

Modern pedagogical methods and technologies have increased the flexibility of teaching. The material-technical and information base is being strengthened and constantly updated by supplying modern teaching and laboratory equipment, in order to improve the learning process with high-quality educational literature, modern teaching methods and advanced teaching technologies (information from CSSVE, 2016).

The degree of involvement of national, regional and local management structures, as well as businesses and employers' groups, in the improvement of VET management and policies is being increased. In addition, partners are being encouraged to participate in the development of a system approach to cooperation at all levels of VET between the main ministries and agencies (information from CSSVE, 2016).

The vocational education sector is very closely linked to the labour market, and closer cooperation among management bodies has been achieved in order to ensure the successful transition of students from education to stable employment.

3. Recommendations for action

Uzbekistan set out a number of objectives to be achieved in 2016:

- to reach a GDP growth rate of 7.8%: production in industry 8.2%, agriculture 6.1%, retail sales turnover 14%, and services 17.4%;
- to maintain inflation in the range 5.5–6.5%;
- to ensure the growth of real income of population by 9.5%;
- to ensure the growth of average wages, pensions, scholarships and grants, taking tax allowances into account, by 15% (information from CSSVE, 2016).

⁷ Karimov, op. cit.



The most important priorities for the improvement and development of vocational education during the period 2016–2017 are closely related to the country's economic development programme (information from CSSVE, 2016).

The modernisation of vocational education should form part of the initiated process of democratic reforms and modernisation of the country, the deep structural changes in the economy (especially in industry and agriculture), and the advanced development and protection of the interests of private property, entrepreneurship and small business (information from CSSVE, 2016).

The key role in achieving these tasks will be fulfilled through the implementation of the Torino Process in Uzbekistan, in order to improve and develop the country's vocational education system in terms of the involvement and responsibility of stakeholders.

This wide participation of stakeholders in the VET reform process at national, regional and international levels will feed into the comprehensive monitoring of VET reform progress as a basis for establishing a link between policy analysis and the achievement of social improvement in the development of vocational education.

The main strategy for state policy is a holistic approach to guaranteeing support for young people by promoting interconnected cooperation among the different agencies and ministries – including the Ministry of Labour and the Ministry of Higher and Secondary Specialised Education – to ensure a successful transition from education to employment.

Specifically, an integrated and holistic approach will contribute to the use of a broad concept of VET for both the youth and adult populations, taking into account economic and social requirements.

Reliability and assessment based on reality are guarantees of the quality of teaching outcomes in the VET system and of its continuous improvement.

Overview of VET and vision for VET

VET in Uzbekistan is designed to support economic development in three main ways:

- 1. as a basis for education and personal development, i.e., as a part of the education system;
- 2. as a source of the skills and competences required for work, i.e., as a part of the labour market;
- 3. as a contribution to social cohesion, ensuring that young people have equal access to knowledge that they can use for their role in society, i.e., as a means of support for civil and social participation.

To this end, it is recommended that best practice be used to further improve the quality of knowledge and upgrade training for young people.

Effectiveness and efficiency in addressing economic and labour market demand

Efficiency and effectiveness in responding to economic and labour market demand in the long term is aimed at the further expansion of the active participation of enterprises/employers in the elaboration of educational and regulatory documents (curricula and programmes, sectoral standards).

In order to improve the expansion of mutually beneficial cooperation between businesses and colleges, as well as the organisation of practical training and future employment for VC graduates, a four-party contract between enterprises, local authorities, VCs and students was introduced. On the basis of such contracts, students undertake mandatory placements in companies. Under the previous system of tripartite contracts, approximately 50% of the students subsequently found jobs in the same company; with the involvement of local authorities, which provide tax benefits for companies that



employ graduates, the employment indicator is now expected to be around 80%8. Sectoral VCs are under the patronage of large industrial enterprises that participate in the training of young employees for the company.

Effectiveness and efficiency in addressing demographic, social and inclusion demand

Differences between rural and urban experiences are important in terms of ensuring an even distribution of vocational education. The agricultural sector continues to provide the majority of jobs and homes. The government's policies and programmes are comprehensive, and are improved and updated regularly. They are effective in terms of ensuring access to vocational training for the rural population as well as for vulnerable groups of people in urban areas.

The work aimed at strengthening the material-technical base of both schools and vocational education is carried out continuously, and, as a result, equitable conditions for students in educational institutions have been established in both urban and rural areas. All institutions have been provided with modern training equipment and computer classes, and 96% of all educational institutions in the country are connected to the electronic information network 'ZiyoNet'.

Gender equality is almost balanced at VCs (49.1% of the pupils are girls and 50.9% are boys). At the same time, there are significant disparities in VCs in terms of the distribution of students by areas of specialisation. Girls are in the majority in such professions as education (76.3% girls; 23.7% boys), and healthcare, physical education and sport (75.6% and 24.4%, respectively), while boys are in the majority in professions in the field of transport and communications (71.3 % boys; 28.7% girls), manufacturing and construction facilities, and agriculture (60.4% and 39.6%, respectively)⁹.

Depending on the nature and complexity of their condition, teenagers with disabilities are trained at ALs and VCs based on integrated education.

Taking into consideration the specific needs of students with disabilities, and students of specialised colleges who need special conditions of treatment, the required number of relevant personnel (including medical personnel, psychologists, masters of practical training and other categories of staff) were defined and approved by the SSVE Centre in May 2016, in consultation with the Ministry of Labour and the Ministry of Finance. With improvements in advanced technologies and teaching methods, the legal instrument for implementing inclusive education should be reviewed and changes made.

Alongside provisions to enable students with disabilities to obtain vocational education, comprehensive support should be provided in terms of physical access to buildings and areas of educational institutions through the creation of special infrastructure (access roads, access ramps, special elevators and lifts for wheelchairs, and specially equipped toilets).

Students with disabilities currently receive vocational education at specialised colleges in 19 professions and more than 50 specialisms on the basis of a one-, two- or three-year term of study, based on the extent and complexity of their condition.

An important aspect of the Uzbek SSVE system, which is unparalleled in international educational practice, is that young people with disabilities (based on the nature and complexity of their condition) who have graduated from ALs and VCs on the basis of integrated education, and adolescents (based on the nature and complexity of their condition) who have completed 12-year compulsory education under general terms have equal rights. In other words, after graduating from ALs and VCs, students

⁹ UNO, Effective employment policy: Use of female potential, UNO, Tashkent, 2014.



⁸ Ibid.

have a sufficient level of knowledge to enter higher educational institutions and to continue their education in their chosen specialism.

It is necessary to improve the elaboration of special literature for providing methodological support for the inclusive education of children.

It is important to upgrade the training of teachers on inclusive education and to improve teachers' skills in the effective teaching of children with special needs.

Internal efficiency of the VET system

The following recommendations are made:

- further improvement of the qualitative status of SSVE teaching staff, and advanced training of teaching staff to a level that meets modern requirements;
- further informatisation of the educational process, and greater use of information and communication technologies in the educational process;
- further development, strengthening and constant updating and improvement of material-technical and information base of educational institutions; supplying the educational process with more high-quality educational literature, new teaching methods and advanced teaching technologies; providing modern teaching and laboratory equipment;
- further improvement in the record-keeping mechanism for those who attend private non-state educational institutions.

Governance and policy practices in the VET system

The progress of the development policy and improvement of vocational education has been stable and has united the regions in a participative approach to the comprehensive modernisation of vocational education.

Key areas of change are the expansion of the SSVE system across the country, and increased support for schools and teachers' professional quality.

Employment opportunities for VC graduates should be improved with the introduction of state/public organisational and economic mechanisms, and the establishment of management mechanisms to ensure the inclusion of the vocational education system in the solution of enterprises' personnel problems.

The content of vocational education should be updated on the basis of professional standards, formulated with the direct participation of employers' associations.



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