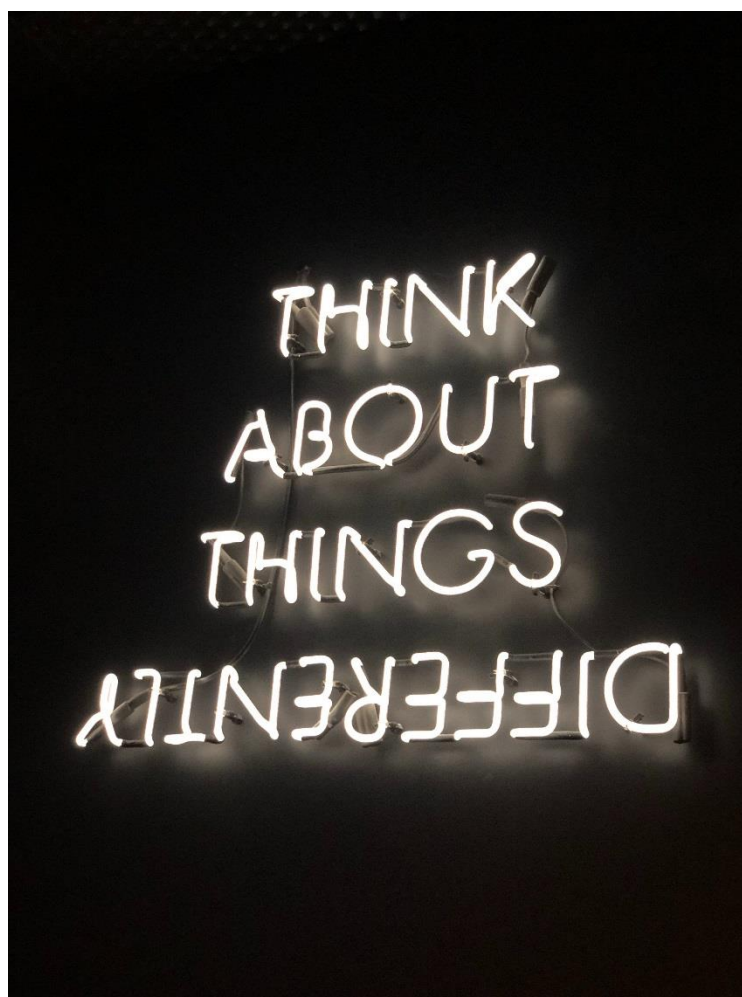# NATIONAL STRATEGY PAPERS (NSP) TO SUPPORT VNFIL

(Policy Recommendations)

Edition

Centro de Formação Profissional Para o Comércio e Afins, CECOA

Authors

Charitini-Maria Skoulidi | C.M. SKOULIDI & SIA E.E., p-consulting

Chiara Marchetta | FORMA.AZIONE SRL

Chiara Palazzetti | FORMA.AZIONE SRL

Cristina Dimas | Centro de Formação Profissional Para o Comércio e Afins, CECOA

Inga Puisa| Lithuanian education and science trade union, LESTU

Lilija Pusvaskiene | Vilniaus Automechanikos ir Verslo Mokykla, VAVM

Panagiotis G. Anastassopoulos | C.M. SKOULIDI & SIA E.E., p-consulting

Sílvia Coelho | Centro de Formação Profissional Para o Comércio e Afins, CECOA

Sylvia Liuti | FORMA.AZIONE SRL

Tatijana Babrauskiene| Lithuanian education and science trade union, LESTU

Place of Edition

Lisbon, PT

Date of Edition

August 2021

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY

The importance of lifelong learning is more than ever undeniable and validation of non-formal and informal learning (VNFIL) is, therefore, a crucial building block of a real lifelong learning society, a society where all forms of learning "count" in the sense of being socially valued and treated equally by the education and training systems and by the labour market.

Validation has the potential to contribute to achieving the goals set by the Europe 2020 strategy, as it can contribute to matching skills supply and demand, supporting mobility across sectors and countries and fighting social exclusion but it also supports the ambitious goals set out in the European Skills Agenda of strengthening sustainable competitiveness, ensuring social fairness, putting into practice the first principle of the European Pillar of Social Rights (access to education, training and lifelong learning for everybody, everywhere in the EU) and building resilience to react to crises, based on the lessons learnt during the COVID-19 pandemic.

Progression opportunities need to be at the core of vocational education and training (VET) as set out in the Council Recommendation 2020 on VET for sustainable competitiveness, social fairness and resilience. VET need to be learner centred, offer flexible and modular pathways based on the recognition of the outcomes of non-formal and informal learning (VNFIL) and validation mechanisms and need to be in place allowing the transfer, recognition and accumulation of individuals' learning outcomes, as a contribution to the achievement of the 2025 EU-level objectives in the area of education and training, social and employment policies.

In 2012, the Council Recommendation on validation encouraged Member States to put in place national arrangements for validation by 2018 and the main findings of the "European inventory on validation of non-formal and informal learning 2018 update" clearly shows that, **although relevant progresses have been made, there was a lot of room to advocate for quality and efficiency of the VNFIL systems throughout Europe, supporting society and policymakers**. If **achievement of the 2025 EU-level objectives** (where validation plays its role) is to be considered, then extra-efforts need to be made. This was the framework in which the PROFI VNFIL project was born and this output developed, **addressing the still existing areas of improvement and gaps in partner countries' national VNFIL strategies**, namely in terms of efficiency, quality, visibility and trust on the systems, attracting interests of stakeholders from different sectors of education and training.

So, the **main objective of this output** is to advocate for quality and efficiency of the VNFIL systems, supporting society and policymakers at national/regional level but also at European level.

For doing so, the **methodology** defined, used as basis what was already at disposal at European level (CEDEFOP work in this matter was an essential source of information) but also at national/regional level. It also took advantage of other project activities (e.g. good practices and tools described in

IO1 desk research; pilot testing of IO2 e-portfolio and self-assessment tests pilot testing; testing of IO3 training programme near VNFIL practitioners, stakeholders' committees, etc) to identify potential improvement areas and concrete recommendations for action, at a system level but also at providers level.

Details on the methodology can be found below and progress outputs can be found on annex 1.

Considering the **heterogeneity of the countries/regions involved in the project** (Portugal, Greece, Lithuania and Italy/Umbria region) as far as VNFIL systems development is concerned, the option was to keep in **this Strategy Paper only general and common recommendations** that could, depending on the stage of development of the national/regional system, serve as an input for quality and efficiency of the systems.

Based on these (European) recommendations, **National Strategic Papers (NSP) were developed** by partner countries, translating but also adapting them according to the specificities of their national/regional context.

2.   OBJECTIVES & METHODOLOGY

The **main objective of this output** is to advocate for quality and efficiency of the VNFIL systems, supporting society and policymakers at national/regional level but also at European level by proposing a set of recommendations **addressing the existing areas of improvement and gaps in partner countries' national VNFIL strategies**, namely in terms of efficiency, quality, visibility and trust on the systems, attracting interests of stakeholders from different sectors of education and training.

To develop this output the following methodology was applied:

Development of a common structure for national data information collection and analysis	
Data information collection at national level	**Identification of existing VNFIL systems characteristics in terms of:** • Strategy, Objectives & Priorities • Target groups • Sectors/areas addressed • Validation tools and methods in place • Link/Alignment with NQF • Link/alignment with other national policies (in terms of VET, Adult Learning, etc) • Governance & accountability • Investment in the development of VNFIL professionals' competences • Quality assurance measures and indicators of measurement
	Quality of existing VNFIL systems in terms of: • Perception of the quality of the systems in place • Visibility of the systems in place • Efficiency of the systems in place
Analysis and review of existing VNFIL systems response in terms of achievements, and shortcomings and implications for recommendations	**Analysis conducted, at national level, with involvement of representatives from different stakeholders** **Reporting of this analysis provided by each country to the IO leader, following the common structure defined (Annex 1)**

	Analysis of each country report in order to extract common EU recommendations
Recommendations drafting, approval & translation	**Common EU recommendations organised according to defined contents areas**
	Recommendations presented and discussed in project staff Learning Activity
	Approval of common EU recommendations (EN)
	Recommendations (translation/adaptation in partners languages)
Dissemination	

For each of the above-mentioned activities, the different perspectives from VNFIL candidates, professionals and institutional stakeholders including governmental bodies, social partners, private sector (labour market, companies) were considered. (i.e. using stakeholders committee meetings, national trainings for VNFIL professionals, e-portfolio and self-assessment tools testing by candidates, ad-hoc focus groups organised for this purpose, etc).

Based on the project application and on the evidences obtained from the data collection, analysis and review carried out, the following content areas were agreed among partners as being the areas around which recommendations for policy action (at system level and at providers level) would be organised.

CONTENT AREAS

- Capacity Building
- Improving the Quality of Alternative Assessments (E-tools)
- Matching Assessments to Needs (Self-Evaluation)
- Alignment with National Qualifications Frameworks
- Stakeholders Engagement
- Visibility and Credibility of the System
- Quality of the System
- Institutional and Political Framework

The main **SOURCES OF INFORMATION** used for the development of this output are as follows:

- Description of VNFIL Systems in each partner country included in IO1 desk research on existing VNFIL good practices and tools - https://profi-vnfil.eu/compendium/
- VNFIL good practices and tools described in IO1 desk research (from the following countries: Portugal, Greece, Lithuania, Italy, Slovenia, France, Finland, Cyprus, The Netherlands, Denmark, North Macedonia, Norway, Sweden) - https://profi-vnfil.eu/compendium/
- Desk research on existing methodologies for self-assessment, on legal requirements and on existing VNFIL portfolio and e-portfolio in partner countries (as part of IO2 development)
- CEDEFOP Reports available at https://www.cedefop.europa.eu/en/events-and-projects/projects/validation-non-formal-and-informal-learning
- Main results deriving from interviews with key players / experienced VNFIL providers in each partner country, developed within IO1 to explore the current European situation on existing innovative and effective VNFIL tools, especially electronic ones (like e-portfolio) and to identify the most effective instruments needed to fulfil successful VNFIL
- Main results coming from IO1 online questionnaire on existing innovative and effective VNFIL tools, especially electronic ones - https://profi-vnfil.eu/survey-for-innovative-vnfil-tools/
- Main results coming from the pilot testing of the e-portfolio and self-assessment tests, as part of IO2 activities - https://portfolio.profi-vnfil.eu/pt-pt/
- Main results coming from IO3 online questionnaire on needs of VNFIL professionals in terms of urgent challenges and required competences, also those specifically related to the effective use of VNFIL e-tools - https://profi-vnfil.eu/survey-for-vnfil-professionals/
- Main results coming from the testing of the training programme near VNFIL practitioners conduced at national level as part of IO3 activities
- Data collected from stakeholders in Stakeholders Committees meetings or by other relevant means
- Data collected from VNFIL professionals participating in the project learning activity
- Structured analysis and review conducted at partners countries level on existing VNFIL systems response in terms of achievements, and shortcomings and implications for recommendations (Annex 1)

3.   RECOMMENDATIONS

Heterogeneity of the countries/regions involved in the project (Portugal, Greece, Lithuania and Italy/Umbria region) as far as VNFIL systems development is concerned, dictated the need to keep in this (European) Strategy Paper only general and common recommendations that could, depending on the stage of development of the national/regional system, serve as an input for more quality and efficiency.

Recommendations were also thought as contributions, at a system level but also at providers level. The rationale behind this is that although policy level is essential to set the framework and give the right visibility to VNFIL processes, providers also play a fundamental role in promoting the system and insuring efficiency and quality approaches to the processes. Adequate systems do not work without good, well prepared and committed providers but also the most skilled, organised and customer-oriented providers cannot be efficient and provide quality services to candidates unless, the grounds and the foundations of the systems are created and sustained, at system level.

This symbiotic relation is clearly central to VNFIL system development and progress as the research conducted within the project showed. Example: in Umbria region (the Italian regional system that was part of this project), there is a specific certification and registration mandatory for all VNFIL professionals wising to provide VNFIL services to candidates but, VNFIL system is still under development, at a system level; on the other way around, Portugal have a system for the recognition, validation and certification of competences (VNFIL processes are known in Portugal as RVCC processes) in place since 2000, high in the political agenda, managed at ministerial level, offered for free to candidates with a lot of people already certified so far in the country (e.g. from January 2017 to April 2021, 83.090 persons obtained a full qualification and 560.608 a partial qualification, via VNFIL processes), but there is no mandatory training (initial or continuing) for VNFIL professionals, only requirements on the competences profile for the different kinds of professionals involved.

Recommendation Area: Capacity Building

It is not by chance that this is the first area of recommendation. No matter if we are building a VNFIL system from scratch or if we have a well stablished and recognised system, human resources involved (or to be involved) and their skills and competences need to be considered as a central building block of the system, foreseen from the very beginning. It seems that Europe performance in this matter is still progressing. As described in the "European inventory on validation of non-formal and informal learning 2018 – Final Synthesis Report" the level of comprehensiveness toward

the principle set out in the Council Recommendation on validation, "provision is made for the development of the professional competences of validation practitioners" was rated as low, in 2018.

Adequate definition of the kind of professionals to be involved, their profile and competence requirements but also well thought, efficient and quality provision of capacity building actions in the form of initial and continuing training activities but also other types of actions (working meetings, community of practices, forums for exchange, etc) for the different types/kinds of professionals/practitioners involved need to be in the core of the system.

Training need to consider the different dimensions of VNFIL work, the different profiles involved and their specific needs and a permanent need to adapt the different professionals' skills and competences to the changing environment, digitalisation playing, also in VNFIL field, a central role. Therefore, recommendations are in the sense of ensuring a system where:

- Profiles and competences requirements of professionals involved are clearly defined and known
- Attributions, tasks and responsibilities of the different professionals/practitioners are clearly defined and known
- Initial training but also continuing training are systematically provided
- Training considers the different needs of the professionals involved (e.g. in Portugal and Lithuania training targeted to members of the jury is considered as a priority)
- Training is focused on the process itself (identification & documentation of competences; assessment tools and methods) but also on Adult Learning methodologies, soft skills, ethics, privacy and data protection issues, quality assurance, etc
- Training is also focused on the use of digital tools, raising the digital competences of professionals, taking advantage of COVID pandemic "lessons learned"
- Cooperation between competent bodies and VNFIL providers, also at capacity building level is strong

One good practice that can be followed is the one in place in Umbria Region, where an effective process of practitioners' competences development is defined, that started in 2008 as one of the first Italian regions working, at that time, on training credits recognition and that foresees: 2 units of competence with the competences that professionals wanting to be involved in validation processes need to demonstrate; training activities to prepare for that and a final examination to be certified as such.

Another sensitive topic is related to the quantitative dimension of HR involved. The number and the status of practitioners (permanent link versus precarious contracts or even self-employed situations) need to be well-considered and adequate to validation process needs, so that

candidates' expectations are fulfilled, and know-how remains in the system. Also, territorial distribution of providers and professionals need to be planned and organised, again, to answer to the real needs of potential candidates.

Recommendation Area: Improving the Quality of Alternative Assessments (E-tools)

One of the lessons learned from COVID19 pandemics is that digitalisation of almost all the economic, social and even political processes is not only possible but an imperative, that each one of us need to embrace and explore its potential. VNFIL is not different and the experience gained during this crisis needs to be taken forward, improving, from one side, the way digital tools are used for the benefit of candidates and the system, and from the other side, focusing on the quality of the e-tools used and created for this purpose.

One of the aspects that project desk research showed was a variety of validation tools and methods available but mostly focused on face-to-face situations and interactions, although good practices examples on the use of alternative methods and e-tools were found. (https://profi-vnfil.eu/compendium/)

Therefore, we advocate for the following measures to be considered, as inputs for a high quality and efficiency of VNFIL, at system level but also at providers level:

- Clear acceptance and integration of digital tools in the VNFIL process
    - Online makes it possible to reach more people, with less cost (e.g. time)
    - It can be more attractive and efficient for certain qualifications and for the application of some methods (e.g. observation in the workplace)
    - Can boost the number of contacts and interactions
    - Can be an opportunity to reach candidates from other geographical areas, increasing the outreach potential of VNFIL processes
- Development of digital platforms/tools that could serve the purpose of supporting the development of VNFIL processes and the interaction between the different stakeholders involved (candidates, counsellors/assessors, members of the jury, certifying bodies) but that could also be used as a way to allow candidates to collect and demonstrate their skills and competences. At this point, the project e-tool developed need to be mentioned.

In fact, the tool https://portfolio.profi-vnfil.eu/ is a web-based tool developed within the project that answer to the purposes above identified:

- Support VNFIL processes

11

PROFI-VNFIL - Ensure the professionalization and good functioning of VNFIL
(Project number 2018-1-LT01-KA202-047020)

- Source of information and sharing within certain groups or in specific areas
- Allow the collection of electronic evidence of a candidate's education, training and work path (e-portfolio)
- Serve as an initial screening tool for the candidate to understand if he/she is ready for a complete validation process or if he/she needs to improve his/her skills and competences before proceeding to a validation/certification process

Testing results in partner countries are very promising as utility, user friendless and potential of use in the future were rated high among practitioners and candidates testing the tool.

Stakeholders involved during the project were, nevertheless, unanimous in the opinion that e-tools need to be integrated with face-to-face solutions in order not to exclude the less fortunate (in terms of digital literacy, hardware, software) and that digitalisation of the processes and the use of e-tools need to be implemented bearing in mind some stumbling stones:

- Steps need to be taken to avoid polarization of the system (better for some but much worse for others)
- Cyber security issues need to be addressed, by establishing specific regulations and good practices regarding data and privacy protection
- Training of professionals on the use of e-tools need to be planned and implemented (e-professional)

The possibility to include the social networking dimension in the e-tools is also advisable, bearing in mind its popularity and outreach potential.

Matching Assessments to Needs (Self-Evaluation)

One of the criticisms often made to the education and training system and therefore to the validation processes is that standards are designed according to the language of the VET system and not according to the language of the world of work, making it hard to use the standards for a coherent assessment of the skills and competences of potential VNFIL candidates, particularly when concerning the assessment and recognition of professional skills. Another problem frequently identified is that qualifications and standards do not accompany the labour market dynamics, being frequently outdated.

That's why we advocate for updated and "understandable/readable" (for candidates and for the labour market) standards (especial professional ones), that can better match assessment to the reality of candidates.

Also, we advocate that the existence and use of self-evaluation and self-assessment tools, apart from being relevant self-awareness and empowering tools, can be a way of better matching assessment to the needs of candidates, as they allow candidates to have a first contact with the skills and competences required in the standards, better informing the decision-making process of proceeding into a validation process.

In this sense, the use of e-tools for self-evaluation and self-assessment of skills and competences can also support this objective. It can serve as an initial screening tool for a candidate to understand if he/she is ready for a complete validation process or if he/she needs to improve his/her skills and competences before proceeding to a validation/certification process, accessible worldwide, making the process democratic and user-friendly. But it can also support digitalisation, as they can serve as a way of self-assessing digital competences of candidates. The use of digital tools for self-evaluation and self-assessment of skills and competences needs, nevertheless, to be carefully planned, not to exclude the less digitally literate, many of which are one of the targets of validation process in Europe.

Again, we would like to mention the web-based tool https://portfolio.profi-vnfil.eu/ developed within the project as it answers to the purposes identified in the recommendation area "Improving the Quality of Alternative Assessments (E-tools)" but also to the purposes identified above: support self-evaluation and self-assessment of skills of competences; based on updated professional profiles and standards; better matching assessment to the needs of users; raising self-awareness on required skills and competences; serving as an initial screening tool for candidates to realise if their competences are in line with the standards before deciding to proceed to a validation/certification process.

<div style="background-color:#4472a8; color:#f0a500; font-weight:bold; padding:4px;">Recommendation Area: Alignment with National Qualifications Frameworks</div>

As described in the "European inventory on validation of non-formal and informal learning 2018 – Final Synthesis Report" the level of comprehensiveness toward the principle set out in the Council Recommendation on validation, "validation arrangements are linked to NQF and in line with the EQF" is rated as high in 2018 and confirmed by project research activities in 2021.

From a formal and institutional point of view, as stated in the Report above mentioned "qualifications included in the NQFs can be accessed through validation and lead to the acquisition of modules or a part of a formal qualification and standards for qualifications obtained through validation in education and training are mostly the same as standards in formal education and training". The issue is not about formal value of validation; it is mostly about the value attributed by

the labour market and the society, which still do not consider qualifications obtained via VNFIL as having the same "value" as qualifications obtained via formal education.

The recommendation is, therefore, linked with the need to reinforce the visibility and credibility of VNFIL systems in society and in the labour market, from a system level but also with a lot of room for improvement regarding providers, who should also embrace this mission of raising the credibility of the system, by providing effective and high-quality services (see recommendations below regarding this topic).

Recommendation Area: Stakeholders Engagement

Engagement of the interested parties is key to any process and in VNFIL processes it is not different. Although formal involvement of a wide range of stakeholders exists in the countries considered in this output (education and training providers, validation providers, competent bodies, employment services, employers and employers organisations, trade unions, etc), broadly the recommendation goes in the sense of increasing this involvement and engagement, making sure that the relevant stakeholders have the skills and the resources (namely HR) to perform their role within the system. The following improvement measures were discussed:

- Improving and increasing the involvement, relationship and communication between the national education and VET authorities, ministries, employers and other relevant organisations, at system level but also among practitioners operating at providers level
- Improving the social value/recognition of certifications/diplomas obtained via VNFIL namely near employers and employee's representatives but also within the large community of stakeholders from the education sector how still disregard qualifications obtained through VNFIL
- Raising the awareness of the benefits of learning (and lifelong learning, including VNFIL), as an empowering tool to exercise democratic values, so to make the labour market more dynamic and responsive
- Increasing the engagement of stakeholders, especially employers, in order to mobilize namely low-skilled employees and facilitate their access to validation services

As an example, even in Portugal a country with an organised and robust VFNFIL system in place since 2000, although social partners are involved in the system with responsibility for different aspects of validation – from the design of qualifications and setting up of standards to the assessment of skills and competences, as members of the juries) - national project activities leading to the Portuguese NSP clearly showed that there is a need to raise employer's awareness on how validation processes can affect their HR management policies namely making employers aware that the time invested by

employees in VNFIL processes can contribute to the employers duty of providing mandatory training hours to their staff.

Recommendation Area: Visibility and Credibility of the System

As described in the "European inventory on validation of non-formal and informal learning 2018 – Final Synthesis Report" the level of comprehensiveness toward the principle set out in the Council Recommendation on validation, "validation arrangements in place" is rated as high in 2018. In fact confirming the data from 2018, in 2021 at least in the countries/regions involved (Portugal, Greece, Italy/Umbria Region and Lithuania) there are validation arrangements available, however, it should be noted, that at least in Greece, Lithuania and Italy/Umbria Region, validation opportunities and arrangements remain limited and not well known by potential candidates, providers, the labour market and society at large and even in Portugal, a country with a well-established VNFIL system, recommendations are in the sense of raising the visibility and the credibility of the system.

This need of raising visibility and credibility of the system is directly linked with problems such as:

- Limited knowledge of the VNFIL system and its benefits by the different stakeholders, including candidates and employers, as a tool for professional and personal growth, social inclusion and labour market integration
- Difficulty in mobilizing employers and candidates to the system
- The need to fight against some social "distrust" regarding the validity and credibility of qualifications obtained through VNFIL processes
- Limited social and labour market value attributed to qualifications/certificates obtained via VNFIL
- No positive consequences/results are perceived deriving from obtaining a qualification/certification

Therefore, recommendations are in the sense of ensuring a system where:

- There is a consistent and coherent investment in information campaigns, that disseminate information and advertise the system and its benefits using channels and means that reach the entire population (massive dissemination) but also specific information campaigns addressing the different targets involved and their particular information needs (e.g., information campaigns targeted to social partners as a way to reach employers and candidates)
- Quantitative and qualitative performance criteria are balanced, preventing that pressure for reaching quantitative targets put at stake quality of processes and credibility of the system

- VNFIL policy is not depending on the political context but is fully integrated in a long-term national qualification strategy that insures the means and the resources needed for a continuing provision of VNFIL services fully integrated in the education and training system as simply another way of achieving a qualification and certification with the same "value"

Providers also have a role to play concerning the improvement of the visibility and credibility of the system, by:

- Investing in disseminating and informing their direct targets about the system, the process and its benefits
- Focusing on candidate's needs (learners centred system) and on qualitative performance criteria despite the pressure to meet quantitative targets
- Fostering cooperation and complementarity among providers instead of promoting competition
- Encouraging networking and respecting the work of other providers
- Providing faultless services and acting according to quality criteria and codes of conduct that guide and rule the conduct and the performance of professionals in their relation with candidates and with other practitioners

Recommendation Area: Quality of the System

As described in the "European inventory on validation of non-formal and informal learning 2018 – Final Synthesis Report" the level of comprehensiveness toward the principle set out in the Council Recommendation on validation regarding, "transparent quality assurance measures" was rated as medium-high in 2018, which implies that quality assurance mechanisms are in place but that there is room for improvement in this area, confirmed by the project activities leading to the development of this Strategic Paper.

Therefore, recommendations are in the sense of ensuring a system where:

- Quality assurance frameworks specific to validation are encouraged instead of the application of general quality assurance frameworks
- A set of quality indicators and criteria are in place (e.g. quality charter)
- Quality approaches are also applied to the design and development of validation standards, methodologies and tools
- There are a Code of Ethical and deontological principles that guide the conduct of the various professionals involved in the process

- Specific regulations regarding data and privacy protection, covering cybersecurity issues are implemented
- Measures to insure/raise the perception of the quality of the system by stakeholders (candidates, employers and society) are implemented

At providers levels, the recommendations are in the sense of establishing procedures and applying practices that can contribute to raise the quality of the system but also the perception of quality by stakeholders:

- Quality approach to VNFIL processes is systematically and consistently seek and applied
  - At this point, a suggestion could be the creation of ad-hoc groups of providers that, among them, apply the Peer Review methodology. Peer Review is a solid methodology for quality assurance and development with quality indicators and criteria defined for validation of non-formal and informal learning, therefore, considered as an quality assurance framework specific to validation, that foster quality based on peer learning and peer assessment and that according to the experience of partners already using this methodology in Portugal, Lithuania and Italy is of utmost added value for quality development (for more information on this methodology http://www.peer-review-network.eu/)
  - Creation of communities of practices, working groups for sharing practices and knowledge, quarterly workdays between providers, etc
- Adoption of a Code of Ethical and deontological principles to guide and rule the conduct and the performance of providers and practitioners, but it can also be the organisation of team meetings to define and standardize internal conduct and procedures
- Adoption of specific regulations and good practices regarding data and privacy protection of candidates, professionals, and other stakeholders involved, covering cybersecurity issues

Recommendation Area: Institutional and Political Framework

Finally, some recommendations on measures and actions at institutional and political framework needed to insure reliable, trustily, high-quality and efficient VNFIL systems:

- Existence of clear structures and responsible bodies with clear accountability and mechanisms for sharing responsibilities among the different stakeholders involved in the process
- Fully integration of the validation system into the national education and training systems
- Definition of qualification standards and VNFIL standards based on learning outcomes

17

- Clear definition on VNFIL financing process
- Reducing the reliance on EU funds, which can be a challenge for the long-term sustainability of the system

4. ANNEXES

Progress outputs in the form of reports of the analysis and review of existing VNFIL systems response in terms of achievements, and shortcomings and implications for recommendations, conducted, at national level in the partner countries (Portugal, Italy, Lithuania and Greece) can be found on Annex 1.