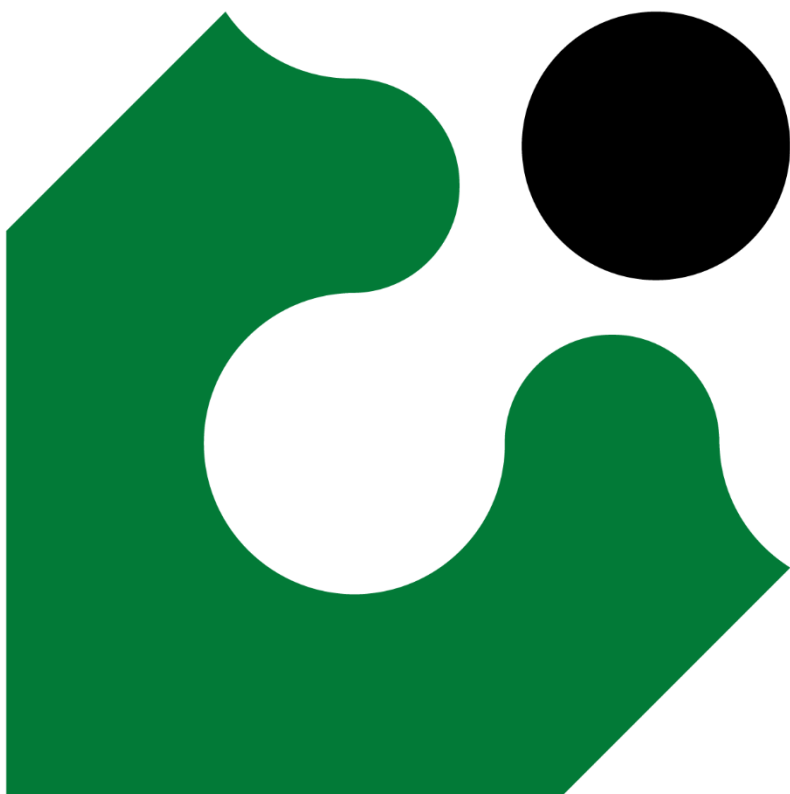




Report on the System of the Accredited Operators
for Employment and for Education and Training in
the Lombardy Region
Executive Summary

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Executive summary

The Report on the System of the Accredited Operators for Employment and for Education and Training in the Lombardy Region is divided into three chapters (Chapter 1 – The origin and consolidation of the system; Chapter 2 – Regional registers: access, maintenance and revocation; Chapter 3 – The network of accredited operators) and an annex (which proposes a synthetic between accreditation systems for employment, education and training of the Lombardy region and those of Emilia-Romagna, Veneto, Piedmont and Valle d'Aosta regions).

The first chapter analyses the regulatory framework of the accreditation system in Lombardy. The registers of public and private operators accredited for the provision of active employment policy services and educational and training services were established with the Regional Laws no 22/2006 (Article 13) and no 19/2007 (Articles 25–26). The DGR no 2412/2011 and the subsequent implementing decrees provided further details to the mandatory requirements for obtaining and maintaining the accreditation as well as to the enrolling procedures in the regional registers.

In 2015 – by Regional Law no 30 – the architecture of the Lombard accreditation system was completed, confirming the 'quasi-market' model of the system. This was thanks also to the definition of evaluation tools such as ratings, and underlining the crucial role played by the collaboration between accredited operators and institutional entities. The regional measures are contextualised within the national framework in which the Legislative Decree 150/2015 introduces the general principles on which the regional accreditation requirements are based. Also, the Ministerial Decree no 3 of 11 January 2018 of the Ministry of Labour and Social Policies represents an attempt to achieve an homogeneous minimum quality levels across the regions. This is achieved by the introduction of mandatory common requirements for accreditation which, however, the regions can integrate with 'additional requirements'. Of course, as also underlined in the interviews with regional representatives of both the UO Regole e Controlli and Technical Assistance, the emergency situation determined by Covid-19 has already led to the extension of the process of transposition of the Ministerial Decree of 11 January 2018. The Covid-19 pandemic could produce – in the medium and long term – some changes to the systems and procedures for the accreditation of services for employment, as well as for education and training both at national and regional level.

The second chapter first proposes a description of the current structure of the network of regional operators for employment and training, made up of public and private entities accredited and registered in the ad hoc regional registers. These provide services financed by public funding and/or issue certificates and qualifications consistent with the Regional Framework of Professional Standards (Quadro Regionale degli Standard Professionali). The second chapter then provides an in-depth analysis on the procedures and criteria to access and maintain the accreditation, which are necessary to control the access of public and private operators to the system. These also verify the possession and maintenance of quality standards over time, to guarantee an adequate level of quality of the accredited entities and the provided services. In particular, each operator – to obtain the regional accreditation – must own specific requirements of reliability, integrity and solidity from a financial point of view: for

example, the absence of outstanding civil and criminal matters, the presence of an ethical code, the presence of procedures relating to the compliance with the Legislative Decrees no 231/2001 and/or no 190/2012, a minimum threshold of paid-up assets, a certified balance sheet and separate accounting. Moreover, to maintain the accreditation, operators are required to provide a declaration to the Lombardy Region annually that they comply with the requirements.

The second chapter continues by illustrating the sanctioning system in the event of non-compliance by the accredited entities. This system is composed of milder measures, such as the warning and – where appropriate – the suspension, to more severe measures such as the revocation of accreditation. In case of very serious irregularities, there may be a prohibition to activate and provide new services and the ban of accreditation in the following three years. The interviews with the regional representatives of the UO Regole e controlli and Technical Assistance revealed: i) the establishment of a working group with the purpose of evaluating movements, registration procedures, suspensions and cancellations of the operators of both the registers; ii) the online publication, since 2019, of the checklists to draw up the report of the onsite visits and to verify the necessary requirements for the accreditation; iii) the introduction, in 2019, of a sampling process to control the maintenance of the requirements, although scaled down in 2020 due to the Covid-19 pandemic.

The second chapter ends with reporting data.

- *Data on the checks carried out in the two-year period 2018–2019*, which in the case of accredited operators for vocational education and training amounted to 478, divided almost equally between the two periods. In the case of operators accredited for employment services, they amounted to 304, of which about two-thirds were carried out in 2018. Overall, 782 checks were carried out in the two-year period, of which 443 were in 2018 and 339 were in 2019.
- *Data on the cancellation procedures and the revocation procedures in the two-year period 2018–2019*, for what concerns the network of operators accredited for employment services that were mainly attributable to the operators' own choices rather than to acts of the regional administration: there were 10 renunciations (3 in 2018 and 7 in 2019) communicated by the same operators, while there was only one case of cancellation. Regarding the operators accredited for vocational education and training, there were 31 cancellations communicated by the same operators (13 in 2018 and 18 in 2019) and 9 cancellations, of which a third were in 2019. All the cancellations were due to the lack of declarations of the maintenance of the requirements by the operators, a declaration that must be issued every year. There were two revocations in 2019 and none in 2018. In one case, the accreditation was revoked due to the closure of the registered office and DURC (Documento Unico di Regolarità Contributiva, i.e. *the document of contribution regularity*) irregularities, in the other case, it was due to the lack of supervision of the registered office and for the missing communication of the bankruptcy procedure.

The third chapter analyses the data concerning the registers of the operators accredited for employment services and for vocational education and training services, updated to 25 September 2020.

- Overall, there are 793 accredited entities on the regional territory, of which 728 are accredited for training, 237 for employment and 172 for both employment and training. In detail, almost two-thirds of the operators (62 % of the 793 enrolled in the registers) are accredited for the provision of Type B vocational education and training services, while 8.2 % are accredited for the provision of Type A

vocational education and training services. Only 8.2 % of entities are accredited exclusively for the provision of employment services, while 9.3 % are accredited for employment services and Type A training services, and 12.4 % are accredited for employment services and Type B training services. The organisational units (i.e. the places where the services are provided – OUs) amount to 1 640 and show a more balanced composition by type of accreditation between the two main categories, thanks also to the presence – among the operators accredited for employment services – of employment agencies, which typically have numerous local branches.

- *There are 237 accredited operators for employment services with a total of 959 organisational units located throughout the Lombardy region.* Around 72 % of the accredited operators are private entities, 22 % are public entities and the remaining operators are entities created by the social partners. On average, private operators have a greater number of branches (4.6 OUs per accredited private operator) than public operators (three OUs per accredited public operator). Except for one case, all the entities created by the social partners work through a single operational unit.

In the period 2013–2020, the total number of accredited entities increased by 30.2 %, from 182 units in 2013 to 237 in 2020, while the number of OUs grew by 43.3 %, from 669 to 959. The growth of accredited entities was mainly recorded between 2015 and 2016 (+9.7 %), while in case of the OUs this was mainly between 2013 and 2014 (+14 %). On the other hand, from 2018 there was a stabilisation in the number of operators and a reduction in organisational units, from 1002 in 2018 to 959 in September 2020 (–4.3 %). Between 2018 and September 2020, despite the significant stability in the number of accredited operators, there was a decrease of a few dozen in organisational units, which the interviewed representatives of the UO Regole and Controlli consider falling within the usual parameters of turnover between the OUs. However, it seems necessary to monitor the situation to verify the effects of the Covid-19 emergency on the number of accredited operators starting from 2021, when a series of measures implemented in 2020 to counter the economic crisis will probably not be implemented anymore.

The analysis of the distribution of organisational units by Lombard provinces shows the concentration of more than half (53.8 %) of the OUs in the provinces of Milan, Bergamo and Brescia, areas characterised by a greater industrial concentration. Despite this, the provinces with the highest ratio between organisational units and resident active age population are Cremona, Mantua and Brescia. On average, regarding the employment services, in the Lombardy region there are 1.5 accredited organisational units per 10 000 inhabitants aged between 15 and 64 years.

Finally, from the analysis of the budgets made available for each operator, the value of which indirectly reflects the degree of involvement of the operator in regional policies and its ability to achieve the objectives, it emerges that – at the end of June 2020 – 44 % of the total budget was concentrated over 10 operators.

- *There are 728 accredited operators for the provision of vocational education and training services, with 1 026 organisational units located throughout the Lombardy region.* Most of the operators (589, equal to 81 %) are accredited in Section B of the Register. Considering the organisational units, 743 (72 %) are accredited for the provision of Type B training, and 43 are registered in Section B even though the operators are registered in Section A. The other 139 accredited operators (19 % of entities) and 283 OUs (28 % of the offices) are registered in Section A of the register. About 83 % of the operators are accredited with only one organisational unit. Among the entities with two or more organisational units, about three-quarters are also accredited for employment services, and the

remaining quarter is made up of operators accredited for vocational education and training. The legal form of the accredited operators for education and vocational training services is quite heterogeneous, with a prevalence of for-profit companies (62.4 %).

In the period 2013–2020, the total number of operators accredited in the register for education and training services increased by 21 %; similarly, the number of OUs increased by just over 20 %. The number of organisational units grew more between 2015 and 2016 (+4.8 %) and between 2017 and 2018 (+5.3 %). Distinguishing between the types of accreditations, there was a decrease of a few units in the number of operators registered in Section A (i.e. those operators who can provide a wider range of courses) and the relative OUs located in the Lombardy region. Specifically, the organisational units grew in number between 2018 and 2019, going from 288 to 329, and then returning to 283 on the 25 September 2020 (with a decrease of 14 % in comparison with 2019). Overall, from 2013 to September 2020 there was a decrease of about 2 %. On the other hand, in the same period there was a progressive increase in the number of operators and organisational units registered in Section B, providing 'only' specialisation courses, continuous training, permanent training and qualifying training (+31 % of operators and OUs). As already observed in the case of accredited operators for employment services, the representatives of the UO Regole e Controll pointed out that variations of a few dozen organisational units from one year to the next are normal, while the Covid-19 emergency will show most of its effects over 2021.

The analysis of the distribution of organisational units by Lombard provinces shows that, as in the case of operators accredited for employment services, the OUs are mostly concentrated in the province of Milan (38 %), followed by the provinces of Brescia and Bergamo (together 26 %). The provinces with the highest ratio between organisational units and resident active age population are Milan and Brescia. On average, for the education and vocational training services, in the Lombardy region there are 1.6 accredited organisational units per 10 000 inhabitants aged between 15 and 64 years.

In the Annex, the Lombard accreditation system is briefly compared with the accreditation systems of Veneto, Piedmont, Emilia-Romagna and Valle d'Aosta regions. In all these regions, there are separate registers for operators accredited for training services (with different denominations according to the different regions) and for those accredited for employment services. For the training operators, accreditation takes place by main types of activity in Emilia-Romagna (three general and three special main types), in Veneto (four main types) and in Piedmont (three main types and one subsidiary). In Valle d'Aosta Region, the register is divided into two sections – Section A, for operators of financed training, divided in turn into four main types, and Section B, for training activities not subject to public co-financing. Accreditation systems for employment services are more homogeneous in the considered regions. Compared to the Lombardy model, the main differences concern the exemption from accreditation for public employment services in Valle d'Aosta and Emilia-Romagna. Furthermore, only Emilia-Romagna distinguishes between Accreditation 1, related to services for people and employers, and Accreditation 2, related to services for fragile and vulnerable people.

