Education and austerity in the European Union from an autism perspective: Policy mapping in Ireland, Portugal, Italy, and Greece

Robin van Kessel1 | Ines Siepmann1 | Luis Capucha2 | Apostolos Kavaliotis Paschalis3 | Carol Brayne4 | Simon Baron-Cohen5 | Katarzyna Czabanowska1,6,7 | Andres Roman-Urrestarazu1,4,5,8

Abstract
This study explores how autism and education policy are affected by austerity measures in Ireland, Portugal, Italy, and Greece by using a path dependence analysis. The implementation of mixed mainstream classrooms and improvements to infrastructure coincided with the ratification of inclusive education policy. Austerity measures appeared temporally associated with furthering of integration and inclusion policy for all countries under study, potentially due to the economic incentives of an integrated system. This trend is especially visible in Ireland, Portugal, and Greece, whereas lesser so in Italy. Even though the initial focus of this analysis was autism, the findings are applicable to the general area of special education needs due to the non-specific nature of national policies.

KEYWORDS
austerity, autism, education, policy, special education needs
Due to the 2007 financial crisis (otherwise known as the Great Recession), several European Union (EU) Member States have decided to adopt austerity measures (Kentikelenis et al., 2014; McKee et al., 2012), such as Ireland, Portugal, Italy, and Greece. Austerity measures are, by definition, measures to “reduce government spending to free up revenue for debt repayment” and are aimed to contain the financial repercussions that the crisis caused (Stuckler et al., 2017). Unfortunately, it has become evident that austerity measures are detrimental for the functioning of health systems (see Kentikelenis et al., 2014, Stuckler et al., 2017, and McKee et al., 2012 for an explanation of the complex and multifaceted effects). Firstly, due to the austerity measures, many programs that aimed to support people with all forms of disabilities to develop themselves, access education, or enter the employment market have been defunded. Secondly, co-payments on health services have been increasingly re-introduced, which resulted in additional strain being put on the patients while also widening socio-economic inequalities. Thirdly, as a result of the implementation of the austerity measures, self-reported unmet medical needs began to rise (increasing by 0.4% in 2010 to 3.4% in 2012) (Stuckler et al., 2017). All these factors combined can create significant barriers for individuals and their families in accessing required healthcare and education support services.

The right to education for children with special education needs (SEN) has been repeatedly reiterated in the international education policy sphere, with the two core documents being the Universal Declaration of Human Rights (UDHR) and the Convention on the Rights of Persons with Disabilities (CRPD). The UDHR first stipulated that everyone has a fundamental human right to education (United Nations, 1948). The CRPD expanded on this by establishing that “persons with disabilities can access an inclusive, quality, and free primary and secondary education on an equal basis with others in the communities in which they live” (United Nations, 2006). Children on the autism spectrum are particularly in need of access to health and SEN services, since they often experience adverse educational and employment outcomes, and many have significant health needs (Ganz, 2007; Lai et al., 2014; Shattuck et al., 2012). With an estimated global prevalence of 1%–2% and a male-to-female ratio between 3:1 and 4:1 (Lai et al., 2014; Loomes et al., 2017; Roman-Urrestarazu et al., 2021), autism has become a public health priority over the last decades (Newschaffer & Curran, 2003). Autism also often coincides with serious economic challenges for both the caregivers and the persons themselves. Knapp et al. (2009) reported that, in the United Kingdom (UK), supporting children on the autism spectrum costs around £2.7 billion annually and support for adults is estimated around £25 billion. Rogge and Janssen (2019) added that individuals on the autism spectrum and their families generally have higher costs in the areas of health and education-related services compared to typical families. These economic aspects combined with the scaling down of healthcare (e.g., budget cuts for disability programs, diminished access to effective support services due to introduction of co-payments, McKee et al., 2012) as a result of austerity further emphasize autism as a public health priority.

Dedication toward inclusive education was previously found to not only be aimed at improving the education system for children with SEN, but they can also be a result of economic considerations (van
According to other policy mapping articles, autism-specific policy is often barely present and the emphasis lies on general SEN policy (Roleska et al., 2018; van Kessel, Dijkstra, et al., 2020; van Kessel, Hrziec, et al., 2020; van Kessel, Roman-Urrestarazu, et al., 2019; van Kessel, Steinhoff, et al., 2020; van Kessel, Walsh, et al., 2019). As such, this paper analyses the development of the education environment on a policy level in order to explore how (special) education policy itself was affected by the austerity measures. In particular, it focuses on the development of SEN policy over time and, to retain coherence with the other policy mapping articles, explores to what extent autism-specific policy is present. As the final installment of the larger project by the European Consortium for Autism Researchers in Education (EDUCAUS, 2019), Ireland, Portugal, Italy, and Greece are the remaining four countries in the EDUCAUS education policy mapping project to cover and are comparable due to their well-documented experience with austerity measures (Kentikelenis et al., 2014; McKee et al., 2012; Stuckler et al., 2017; Wenzl et al., 2017). Our secondary goal is to contribute to a better understanding of how the education of children on the autism spectrum is affected by austerity measures. We employ a path dependence analysis to carry out this study and use the UDHR and CRPD as underlying frameworks for human rights and disability rights to assess how countries have integrated values from international guidance into national policy. The Great Recession is hypothesized to be a critical juncture that, according to path dependence theory, shifts the direction of policy developments (Mahoney, 2000). Additionally, these countries allow a cross-EU comparison, as Portugal, Italy, and Greece all belong to the Southern part of the EU, while Ireland is situated in the Western part.

2 | METHODS

A path dependence analysis is used, as the analysis in this paper focuses on the interaction of different policy layers in a temporal manner. This methodology enables us to see policy creation as historical sequences and patterns and identify path dependence (Mahoney, 2000). The use of this methodology is validated by previous work of EDUCAUS that mapped education policy pertaining to autism (Roleska et al., 2018; van Kessel, Dijkstra, et al., 2020; van Kessel, Hrziec, et al., 2020; van Kessel, Roman-Urrestarazu, et al., 2019; van Kessel, Steinhoff, et al., 2020; van Kessel, Walsh, et al., 2019), as well as other fields where it was used to investigate policy developments across different policy layers (Bunt et al., 2020; Neicun et al., 2019). Data were gathered through the use of a scoping review, which allows for rapid mapping of the key concepts that underpin a wide research area and is particularly suitable for exploring complex matters that have not yet been comprehensively reviewed (Arksey & O'Malley, 2005; Levac et al., 2010). Due to there not being a comprehensive data source in the EU on autism and SEN policy, a modular approach to legislative and policy work was adopted to analyze the different educational policy environments (Irish, Portuguese, Italian, and Greek). The findings were reported using the PRISMA framework (Moher et al., 2009).

2.1 | Eligibility criteria

Eligibility criteria were similar to previous EDUCAUS work to retain consistency (Roleska et al., 2018; van Kessel, Dijkstra, et al., 2020; van Kessel, Hrziec, et al., 2020; van Kessel, Roman-Urrestarazu, et al., 2019; van Kessel, Steinhoff, et al., 2020; van Kessel, Walsh, et al., 2019). Documents that fit the inclusion criteria conform to (a) having a scope relating to the right to education, national education system, disability laws, inclusion, or special education needs; (b) aiming at children under 18 years; (c) being drafted by a governmental institution; and (d) being published after 1948. Constitutions were
always included and no language limitations were set. Non-governmental policies and actions were excluded. It has to be noted that, in previous works by EDUCAUS, it became evident that autism-specific policy is not always present. When this happened, general SEN or education policy was analyzed instead and the implications for the autism community were discussed.

### 2.2 Search strategy and data collection

In accordance with previous EDUCAUS work, the data collection entailed five steps in which governmental policy repositories formed the primary source of data: (a) review and extract relevant policies and legislation that address the right to education of people on the autism spectrum directly from original governmental sources; (b) develop a multi-layered search strategy for scientific databases (PubMed and Google Scholar); (c) merge policy and academic publications according to the eligibility criteria; (d) acquire further information through searching reference lists of key articles; and (e) merge the three searches into one single data repository for the purpose of this scoping review and to compare it to the already mapped policy of the United Nations and the EU for further analysis.

Table 1 shows the governmental policy repositories that are used per country. The search strategy scanned the full-text for the respective keywords, instead of just titles and abstracts, in order to minimize the risk of overlooking policy as a result of inaccurate or incomplete translations. The keywords used for the policy repositories are as follows: autism, disability, special education needs, education, special needs, special education, and inclusive education. These keywords were translated into Portuguese, Italian, and Greek, respectively, and used individually, as combining the keywords in the policy repositories yielded limited relevant results. Subsequently, the exact build-up of the search query used for scientific databases is shown in Table 2. The data collection took place between June 23rd and August 1st, 2020.

### 2.3 Data analysis

Gathered data were analyzed twofold. Firstly, data are analyzed using the UN and EU policy data from previous policy mapping studies (Roleska et al., 2018; van Kessel, Roman-Urrestarazu, et al., 2019). Appendix S1 shows an overview of UN and EU policy data mapped in previous papers. The extent to which the values of international policies are integrated in the national policies could be determined based on the presence of four elements: (a) the universal right to education laid down in the UDHR; (b) the right for children to receive appropriate treatment consistent with their condition by the Declaration on the Rights of the Child; (c) the right for children with developmental, intellectual, and learning conditions to receive appropriate education to maximize their potential by the Declaration on the Rights of Disabled Persons; and (d) the development of an inclusive education environment as set out by the Salamanca Statement and the CRPD.

Secondly, the findings are delineated to the findings of a qualitative comparative analysis on autism and education policy that set out key factors for the development of inclusive education (van Kessel et al., 2021). The factors that are specifically mentioned are (a) availability of support services for children on the autism spectrum; (b) presence of mixed mainstream classrooms; (c) existence of inclusive education policy; and (d) elaborated infrastructure for teacher training and support.

Finally, the effects of austerity on SEN policy are narratively inferred. Taking the Great Recession as a critical juncture in path dependence (i.e., a highly influential event that alters the course of policy
making, Mahoney, 2000), we compare how the content of national policies shifts after the critical juncture and if there is a potential connection to austerity.

3 | RESULTS

A total of 13,179 sources (1,864 for Ireland, 7,472 for Portugal, 911 for Italy, and 2,932 for Greece) were identified through electronic database searching and two through other sources. Ultimately, 44 sources (10 for Ireland, 10 for Portugal, 14 for Italy, and 10 for Greece) were included in this scoping review. A PRISMA flowchart illustrates the data selection process in Figure 1. A synthesis of the policy data showcasing the development of the education systems per country is reported below. This synthesis involves the identification of crucial policies, as well as themes that can span over a period of multiple years. The contents and publication year of each individual policy are added in Appendix S2. References to all included policies are included in Appendix S3.

Note that the Irish policy repository presented separate chapters, meaning an inflated number of search hits. Like the case with Cyprus (van Kessel, Hrzic, et al., 2020), the full policy was included if a chapter matched the eligibility criteria. Additionally, the Greek policy repository did not accept the translated versions of the keywords, except for the translation for education (“εκπαίδευση”). It also did not allow specific keyword searches up until 1992, meaning data prior to 1992 were collected through gray literature and country experts.

3.1 | Ireland

The constitution of Ireland introduced free primary education for all children in 1937 (Republic of Ireland, 1937), making this a foundational element of the education system and how it developed

<table>
<thead>
<tr>
<th>TABLE 1</th>
<th>The policy repositories used per country</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>Link</td>
</tr>
<tr>
<td>All</td>
<td><a href="http://eur-lex.europa.eu/n-lex/">http://eur-lex.europa.eu/n-lex/</a></td>
</tr>
<tr>
<td>Ireland</td>
<td><a href="http://www.irishstatutebook.ie/">http://www.irishstatutebook.ie/</a></td>
</tr>
<tr>
<td>Portugal</td>
<td><a href="http://dre.pt/">http://dre.pt/</a></td>
</tr>
<tr>
<td>Italy</td>
<td><a href="https://www.normattiva.it/">https://www.normattiva.it/</a>; <a href="https://www.gazzettaufficiale.it/">https://www.gazzettaufficiale.it/</a></td>
</tr>
<tr>
<td>Greece</td>
<td><a href="http://www.et.gr/">http://www.et.gr/</a></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TABLE 2</th>
<th>The build-up of the final search query for academic databases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Search query</td>
<td></td>
</tr>
<tr>
<td>S1</td>
<td>inclusion OR education</td>
</tr>
<tr>
<td>S2</td>
<td>autis* OR ASC OR ASD OR disability OR special educational needs OR SEN OR disab*</td>
</tr>
<tr>
<td>S3</td>
<td>policy OR legislation OR regulation OR law</td>
</tr>
<tr>
<td>S4</td>
<td>Ireland OR Portugal OR Italy OR Greece</td>
</tr>
<tr>
<td>Final</td>
<td>(inclusion OR education) AND (autis* OR ASC OR ASD OR disability OR special educational needs OR SEN OR disab*) AND (policy OR legislation OR regulation OR law) AND (Ireland OR Portugal OR Italy OR Greece)</td>
</tr>
</tbody>
</table>
after the implementation of the UDHR in 1948. Legislation between 1998 and 2007 has two distinct themes: (a) to shape the education system for children with SEN and (b) to establish an environment of non-discrimination.

A framework for the education of children with SEN was introduced in this timeframe. At basis, this included a definition of the term SEN and communications between schools, teachers, parents, and other stakeholders. It also elaborated on specific responsibilities for schools with regards to children with SEN, including the identification of SEN, the provision of services, and the assurance that staff was properly prepared to work with children with SEN. It implemented education support centers and the National Educational Welfare Board, which are both tasked with providing assistance to children with SEN and their environment so they can participate in education. Finally, it specifically mentions that children with SEN should be educated next to their typical peers. At the same time, various policies were implemented that resulted in discrimination on the basis of disability (among others) being prohibited in all places.

A push for inclusion started in the Education for Persons with Special Needs Act in 2004 (Republic of Ireland, 2004). Afterward, the need to develop inclusion in education for children with SEN has been reinforced by subsequent disability and education policy, although it was not specifically mentioned again until the Education (Admissions to Schools) Act of 2018 (Republic of Ireland, 2018). It has to be noted that Irish policy does not specifically address autism. Instead, policy covers SEN in general.

FIGURE 1  An overview of the data selection process
3.2 | Portugal

The foundation of the education system of Portugal is built up by the constitution and the Basic Law of the Educational System (Republic of Portugal, 1976, 1986). This foundation consists of the clear establishment of the right to education for everybody, compulsory and free basic education, access to education for people with disabilities, early screening for SEN, and adaptation of learning materials to account for the needs of children with SEN.

The framework for the education of children with SEN immediately incorporated the values of inclusive education and developed based on that foundation: children with SEN should be educated next to typical children and cannot be exempt from compulsory schooling, additional support is provided to children with SEN to allow them to participate in mainstream education, and an array of SEN categories is established to enhance the integration of children with SEN in mainstream education. On top of this, general disability law added that discrimination on basis of disability was prohibited.

With the implementation of Decree-Law 3/2008 (Republic of Portugal, 2008), autism was specifically labeled as a “high intensity and low frequency” condition. This led to the establishment of a network of “Reference Schools” for autism. These are regular schools that, besides the measures adopted for every other school (mixed mainstream classes, with reduced size when children with SEN are present, support from teachers that are specialized in SEN, special conditions for evaluation, etc.), are equipped with equipment for structured teaching (e.g., Teach Rooms) and specialized staff.

While the values of inclusive education have existed in the Portuguese system since the early days, the legal basis of inclusive education was clarified and further implemented in 2018 (Republic of Portugal, 2018). This legal basis consisted of a concrete definition of inclusion, as well as eight guiding principles that should guide inclusion. Similar to Ireland, Portugal did not implement any autism-specific policies.

3.3 | Italy

Italy's constitution established the right to education for all people (Italian Republic, 1948). This right was expanded by policies in the 1970s. These policies state that all children should have access to and be educated in mainstream classrooms. They also conclude nearly all special school practices, leaving mainstream education as the primary option for children with SEN to attend.

The educational environment for children with SEN started being specifically addressed by policies between 1992 and 2003. A framework for the education of children with SEN was created that included (a) the establishment of a definition of SEN; (b) the specification of the rights of children with SEN and their families; (c) access to diagnostic, health, and social services; (d) adaptions of school material and access to specialized tools in the educational environment; and (e) expectations of training and provisions for teachers. This framework is very integration-based and emphasizes the co-education of typical children and children with SEN.

The framework for the education of children with SEN was adapted and further developed with the policies from 2010 onward. These changes acknowledged the wide diversity in SEN and the unique intricacies that can come with different groups. As such, SEN were classified into three distinct groups: (a) those due to disability; (b) those due to developmental disorders; and (c) those due to disadvantages from cultural, social, and economic causes. Specific guidelines for working with children on the autism spectrum were also implemented in this timeframe. The push for inclusive education was repeatedly mentioned in these policies, with direct attempts at continually pushing for more inclusive educational practices.
3.4 | Greece

Greece experienced a seven-year long military dictatorship that ended in 1974. By 1975, the new parliamentary republic released the first iteration of its constitution. It has been amended three times (1986, 2001, and 2008). The development of Greece's modern education system begins with this last iteration of constitution (Hellenic Republic, 2008). It establishes a baseline in education by implementing free education at all levels and introducing compulsory education for at least nine years. This baseline was later expanded with a proper structure of primary education, secondary education, and teacher education by Law 1566/1985 (Hellenic Republic, 1985).

Further development of the education system picked up from 2008 onward. A policy framework for the education of children with SEN was established that included a push for inclusive education and measures were implemented to aid the timely diagnoses of SEN. Some notable elements of this framework include (a) the choice for children with SEN on whether the grades of foreign languages classes are included in the calculation of the final grade; (b) expectations of classroom sizes depending on the number of children with SEN in a classroom; (c) partnerships between mainstream and special education to minimize the gap between the two systems; and (d) alternative examination methods for children with SEN. However, despite the elaborated structure of SEN policy, they do not distinguish between certain (groups of) conditions.

3.5 | Autism-specific policy

From the 44 discussed policies (10 for Ireland, 10 for Portugal, 14 for Italy, and 10 for Greece), 42 did not specifically mention autism or developmental conditions (95.45%; 10 for Ireland [100%), 10 for Portugal [100%], 12 for Italy [85.71%], and 10 for Greece [100%]). They indirectly pertain to autism by discussing children with SEN overall. Even though the autism community still benefits from these policies, it also indicates a lack of specificity in national policy. Other EU Member States, such as Northern Ireland (UK), France, Spain, and Flanders (Belgium), implemented specific autism-related policies to indicate how autism should be addressed (Roleska et al., 2018; van Kessel, Roman-Urrestarazu, et al., 2019). While the countries under study are progressing on par with other EU Member States in their development of inclusive education, specifically addressing autism in national policy is an aspect in which there is still room for improvement. These findings are in line with a recent article by Precious (2020), who found that the majority of Western Europe did not make concrete policy changes to facilitate the participation and empowerment of the autism community. Subsequently, the changes in the countries that decided to push for change were found to still be in their infancy. Precious explores the option that, in order to successfully adopt these kinds of changes, the current policy template needs to be adapted and the social perspective of the autism community of “lacking capacity, expertise, and value” needs to shift.

4 | DISCUSSION

The aim of this study was twofold. Firstly, we extend the EDUCAUS policy mapping into the four countries under study. Secondly, we explore how the development of the education systems has been affected by austerity measures. By exploring the policy repositories of the countries under study, all relevant national policies on the provision of education to children on the autism spectrum and their right to education were assessed.
Findings of this paper support previous work of EDUCAUS that outline the importance of the UDHR and CRPD in the development of national policy (Roleska et al., 2018; van Kessel, Roman-Urrestarazu, et al., 2019; van Kessel, Steinhoff, et al., 2020; van Kessel, Walsh, et al., 2019). All countries under study built their education systems around the value that education should be accessible for all. During their development, measures for children with SEN were also implemented in all countries under study. When considering the chronology in which the policies were implemented in the countries under study, we can confirm that the values of the UDHR and CRPD were both influential in setting the direction of and translated into national policy.

Times of intense political change and reform arise rarely for most nations. When a significant event such as the Great Recession happens, a new generation of policies is typically rapidly created in response. The austerity measures following the Great Recession, while difficult to measure qualitatively, have undoubtedly shaped the education policies of all four countries under study—providing evidence for the hypothesis that the Great Recession is a critical juncture for policy making. Integration and inclusion are concepts motivated by both human rights and economic decisions. From an economic perspective, integration furthers a capitalist agenda of productivity by both minimizing excess resources, such as those needed if there were multiple special schools/classrooms for every mainstream one, and by creating a more productive and effective workforce (D’Alessio, 2011). Effective education for children with SEN may be appealing if it entails lower state costs later in life in terms of social services and resources. Drudy (2011) describes education as a “strategic tool” for governments to use when implementing austerity measures, with the possibility of lower costs both in the present and future. The impact of potential budget cuts to education under the pretense of human rights and austerity is, unfortunately, not measurable in the policies themselves. Pushing inclusive education for economic considerations was previously reported in Denmark in the policy analysis of the Nordic EU Member States (van Kessel, Walsh, et al., 2019).

Even though inclusion policy may be interpreted as progressive, it inevitably aims to cut costs and, as a result, the overall quality of education may be lowered, as was reported in Italy (Innes, 2013). Italy’s education system was already founded in austerity measures, perhaps explaining the early adoption of mainstream classes and the abolishment of special schools, and experienced additional cuts after the 2007 crisis (Innes, 2013). Notably, Portugal and Greece both started actively implementing inclusive education right after the Great Recession of 2007, with landmark legislation from both countries vastly increasing their frameworks for SEN inclusion. Ireland minorly expanded inclusive education policies, but did not incorporate any great changes in the immediate years following the Great Recession.

A recent qualitative comparative analysis that explored the conditions for achieving inclusive education asserted that mixed mainstream classrooms, support services for children with SEN, inclusive education policies, and a developed infrastructure for teachers (i.e., training opportunities and supporting staff) were critical for the development of inclusive education (van Kessel et al., 2021). Our findings support this claim, as all countries under study developed these four criteria in their pursuit of developing inclusive education systems. Chronologically, support services for children with SEN were implemented prior to the other three elements, which is consistent with other EU Member States (van Kessel, Roman-Urrestarazu, et al., 2019; van Kessel, Steinhoff, et al., 2020; van Kessel, Walsh, et al., 2019). This is also consistent with the development of international guidance, where the rights for people with disabilities were established prior to the push for integration and inclusion. The implementation of mixed mainstream classrooms and improvements to the teacher infrastructure coincided closely with the ratification of inclusive education policy. This is consistent with other EU Member States in the sense that if improvements to the teacher infrastructure occur, they are accompanied by inclusive education policy.
This study is not without limitations. Firstly, though our findings are not blindly transferable, the concepts can be translated to other education systems after accounting for local and cultural circumstances. Secondly, this study is based on purely policy and cannot be used to gauge how these policies are put in practice. Nevertheless, it provides information on one of the “building blocks” of the education system and how the system is designed at the highest level. Thirdly, the national legal databases of Ireland, Portugal, Italy, and Greece were used in the data search. To use these databases (aside from Ireland), the search terms had to be translated into the respective languages and the documents had to be translated back to English using machine translation services. To ensure completeness and correctness of the data, country experts reviewed the translations and data analysis. Fourthly, this paper did not consider actions by non-governmental organizations, which may be used to enhance national policy. Fifthly, connecting austerity with the development of education was a narrative process. Due to the fact that there is no concrete policy mapping of austerity measures in the countries under study and only high-level reviews (Kentikelenis et al., 2014; McKee et al., 2012; Stuckler et al., 2017), specifically linking the development of education policy to austerity measures was impossible. This immediately provides a new research opportunity, namely to chronologically map austerity policies and interlink them with the development of education. Finally, this paper only investigated education policy that applied to children. Adults with SEN that are in educational settings are not included in this analysis, even though they may experience similar learning difficulties.

In short, this study provided insight in the SEN policy environment of Ireland, Portugal, Italy, and Greece. Path dependency analysis shows the integration of most values of the UDHR, CRPD, and other international guidelines in national policy. Austerity measures were considered influential in shaping the education system by pushing for inclusive education earlier from a cost-containment perspective.

ACKNOWLEDGEMENTS
We would like to thank the reviewers for contributing to the improvement of the quality of this study.

CONFLICT OF INTEREST
The authors declare that they have no conflict of interest.

AUTHOR CONTRIBUTIONS
RvK performed the data collection, data analysis and the outlining, writing, and reviewing of this manuscript. IS assisted with data analysis, writing, and reviewing. All other authors contributed in meaningful manuscript at various stages in its development. All authors read and approved the final manuscript.

ETHICS APPROVAL AND CONSENT TO PARTICIPATE
Since all used sources are publicly available and already enacted in the countries under study, no ethical implications with regards to the outcomes, and no situation in which consent needed to be requested, are present.

DATA AVAILABILITY STATEMENT
All data are achieved from publicly available databases, the used documents including their source can be found in the list of References.
REFERENCES


Italian Republic. (1948). *Constitution*.


Republic of Portugal. (1986). *Basic law of the educational system*. https://dre.pt/web/guest/legislaco-consolidada-
lc/34449475/view?q=46%2F86


SUPPORTING INFORMATION

Additional supporting information may be found online in the Supporting Information section.