

Martínez-Izquierdo, Luis; Torres Sánchez, Mónica

Article

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Beyond Traditional Governance Actors in VET Policy Transfer: An Analysis of Fundación Bertelsmann's Role as a Policy Entrepreneur in Dual VET Adoption in Spain

Luis Martínez-Izquierdo*, Mónica Torres-Sánchez

*University of Malaga, Department of Theory and History of Education, Social Pedagogy and
MIDE, Faculty of Education, Campus de Teatinos s/n, 29010 Málaga, Spain*

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Abstract

Purpose: After the Great Recession and under European Union (EU) pressure, Spain began to adopt and expand Dual Vocational Education and Training (VET), starting with Royal Decree 1529/2012, which set its legal framework and gave Autonomous Communities control over its implementation. This process led to Organic Law 3/2022, which made Dual VET the national standard. Along the way, foundations outside formal governance structures, like Fundación Bertelsmann, became active promoters of Dual VET. This article analyses the foundation's role in advancing these policies and its interactions with other VET governance actors.

Methods: The research adopts Reflexive Thematic Analysis to analyze qualitative data from various sources. These include grey literature produced by Fundación Bertelsmann, testimonies before the Education and Vocational Training Commission regarding the forthcoming Organic Law on the Regulation and Integration of Vocational Training, and semi-structured interviews. The interviews involved senior representatives from the foundation and stakeholders from Spain's central, Andalusian, and Basque VET governance.

Findings: The findings show how Fundación Bertelsmann positioned itself as an actor in the transfer of Dual VET to Spain. This involved a clear strategic vision, the use of pilot projects

*Corresponding author: luismartinez@uma.es



as its main way of operating, and the creation of alliances with established governance actors. Its work focused on three areas: Supporting implementation, promoting the Spanish model and the concept of duality, and producing practical publications. While business organizations praised these efforts, other actors (especially governments and unions) were more skeptical, even if they acknowledged the value of certain activities such as advisory services and guide development.

Conclusion: Fundación Bertelsmann has played the role of a policy entrepreneur in the process of adopting Dual VET in Spain. There is no detailed evidence of another nationally autonomous foundation taking on a similar role. However, the work of this foundation parallels that of development aid agencies, organizations, and foundations from Central Europe or directed from this region in the processes of Dual VET adoption on a global scale.

Keywords: VET, Vocational Education and Training, Dual Apprenticeship, Education Policy-Making, Policy Transfer

1 Introduction

The Great Recession served as a stress test for the productive systems of Southern Europe, further exacerbating already high youth unemployment rates (Eurostat, 2008, 2011). According to the European Union (EU), these developments underscored the inefficiency of school-based Vocational Education and Training (VET) systems in Southern Europe, in sharp contrast to the "world-class" Dual VET systems of Central Europe (European Commission, 2012, pp. 5–6). In this context, the EU launched a soft pressure strategy to promote the adoption of Central European-style Dual VET in the Member States of the region, using a range of mechanisms including financial incentives and subsidies (Martín-Artiles et al., 2020), recommendations (Martínez-Izquierdo & Torres-Sánchez, 2022), as well as the creation of the European Alliance for Apprenticeships (Graf & Marques, 2023). In response to EU pressures, countries traditionally characterised by school-based approaches to skill formation such as Spain, Greece or Portugal, initiated processes to adopt or expand Dual VET and to introduce the underlying concept of duality (Sanz de Miguel et al., 2024).

In Spain, this process began at the end of 2012 at the central level with the approval of Royal Decree 1529/2012 of 8 November, on the regulation of the training and apprenticeship contract and the establishment of the bases of Dual VET (hereafter Royal Decree 1529/2012), which introduced a vague and fragmented legal framework for Dual VET (Moldes-Farelo & Molina-García, 2020), while delegating to the Autonomous Communities the authority to decide whether and how to implement it within their respective jurisdictions. This led to a progressive implementation of Dual VET across all regions, with Germany frequently cited as a reference in policy discourse (Martín-Artiles et al., 2019), albeit with notable disparities

in regulatory frameworks and levels of development (Consejo Económico y Social, 2023). This initial phase of the adoption within the broader policy transfer process culminated in 2022 with the enactment of Organic Law 3/2022 of 31 March on the Organization and Integration of Vocational Education and Training (hereafter Organic Law 3/2022), which established Dual VET as the standard nationwide, transforming it from an optional modality into the central pillar of the VET system.

During the initial expansion period (2012–2022), traditional VET governance actors in Spain were involved in implementing Dual VET, while its adoption also brought new actors into the system. Among them, foundations operating outside official governance structures emerged as active agents, with two standing out in particular. The first, Fundación Bertelsmann (kept in Spanish throughout this article to avoid confusion with the global group), is part of the Bertelsmann Stiftung network and has been actively involved in promoting the adoption of Dual VET in Spain since 2013. The second, Dualiza Bankia (now Caixabank Dualiza), was established in 2016 as a continuation of the Dual VET support strategy initiated by its predecessor bank in 2013.

Building on this context, this paper conceptualizes the implementation of Dual VET in Spain as a process of educational policy transfer (Phillips & Ochs, 2004; Steiner-Khamsi, 2003) and focuses on analyzing the role of national foundations in disseminating Dual VET policy and the underlying concept of duality. Specifically, it examines the role of Fundación Bertelsmann in promoting these policy during a period when its implementation was still voluntary for the Autonomous Communities and when levels of awareness and engagement among traditional VET governance actors were still limited or even non-existent (Martínez-Izquierdo & Torres-Sánchez, 2024). In addition, the article explores how the foundation interacted with other actors involved in the governance of VET, both at the national level and within the regional ecosystems of Andalusia and the Basque Country. The selection of these two Autonomous Communities, together with the national level, reflects their contrasting trajectories in adopting Dual VET. While Andalusia began implementing it after the approval of Royal Decree 1529/2012, the Basque Country pioneered earlier initiatives, starting in 2007–2008 with the *Ikasi eta Lan* program and expanding significantly in 2012 with *Hezibi*.

2 Theoretical Framework

This section introduces the theoretical framework of the study. It first examines theoretical approaches to policy transfer and then reviews evidence on actors outside the traditional VET governance in the dissemination of Dual VET.

2.1 The Analytical Question of "Who" in Educational Policy Transfer Processes: Foundations as Policy Transfer Entrepreneurs

Policy transfer processes are defined as the use of knowledge about policies, institutions, or ideas from one political system in the development of another (Dolowitz & Marsh, 2000). Regarding analytical approaches to educational policy transfer, Steiner-Khamsi suggests re-framing practice-oriented questions (e.g., "What can be learned?") into descriptive, research-focused ones (e.g., "What has been learned?") (Steiner-Khamsi, 2003). Following this perspective, she recommends addressing analytical questions like: "Why did transfer occur? How was transfer implemented? Who were the agents of transfer?" (Steiner-Khamsi, 2003, p. 170). This article focuses on the third question: identifying and analyzing the agents of Dual VET policy transfer in Spain, specifically, and in this case, the foundations. To do so, it addresses the theoretical ambiguity noted by Li and Pilz (2021), who argue that the diversity of approaches within policy transfer studies often leads to confusion. In response to this challenge, the research adopts an integrative perspective, combining the frameworks of Dolowitz and Marsh (2000), Roberts and King (1991), and Stone (2012). These frameworks provide complementary insights into the mechanisms of policy transfer and help contextualize the roles played by foundations in the adoption of Dual VET in Spain.

Dolowitz and Marsh (2000) identify twelve actor types, including elected officials, political parties, public servants, pressure groups, political entrepreneurs, experts, multinational companies, think tanks, transnational organizations (governmental and non-governmental), and consultants. Among these, the authors highlight the crucial roles of political entrepreneurs in advocating for lessons from other contexts, disseminating ideas, and participating in national and international networks or epistemic communities. Roberts and King (1991) serve to complement the framework on this specific type of actor (policy entrepreneurs) through their theories about the role of these actors in introducing new public policies. While their work does not explicitly address policy transfer, they emphasize the acquisition of ideas "from other policy domains" (Roberts & King, 1991, p. 167) as part of these entrepreneurs' activities. Specifically, Roberts and King (1991) define policy entrepreneurs as those "who work from outside the formal governmental system to introduce, translate, and implement innovative ideas into public sector practice" (p. 152). A public entrepreneur not only promotes a policy innovation, whether by introducing a new model or by supporting the adoption of an existing one in a new context, but also helps shape and formalise it (Roberts & King, 1991). By collaborating with actors who hold institutional authority and access to resources, public entrepreneurs seek to ensure that the innovation is adopted and put into practice. What sets them apart is their involvement in the creation, development and implementation of the innovation they promote (Roberts & King, 1991). According to Roberts and King, their activities can be categorized into three types: Intellectual, strategic, and mobilization activities. Intellectual activities involve generating new ideas or borrowing them from

other contexts by analyzing models, data, or projects for potential transfer. They also include identifying gaps in current policies and linking these gaps to proposed solutions, as well as the initial dissemination of ideas to gather support (Roberts & King, 1991). Strategic activities focus on formulating long-term strategies and action mechanisms, consolidating efforts to ensure systematic planning (Roberts & King, 1991). Mobilization and execution activities include testing ideas through pilot projects, securing support from key actors, lobbying during legislative processes, and engaging the media to amplify their arguments and influence (Roberts & King, 1991).

Finally, Stone (2012) builds on this discussion by theorizing about the role of these actors in international policy transfer processes. She introduces the term "policy transfer entrepreneurs" which encompasses think tanks, business coalitions, universities, philanthropic foundations, and NGOs. These actors are particularly relevant in "soft transfer", which involves the transfer of the intellectual framework underlying a specific policy rather than its direct implementation (Stone, 2012). Their activities align closely with those described by Roberts and King (1991), as they include funding political ideas, forming coalitions and networks, offering consultancy services, and serving as research and resource hubs.

2.2 Evidence on the Role of Actors Outside the Traditional VET Governance in the Promotion of Dual VET Adoption Processes at the Spanish and Global Levels

Scientific evidence on the role of actors in the dissemination and promotion of Dual VET in Spain is scarce. The most focused study, by Barroso-Hurtado et al. (2021), examines the participation of various actors in promoting Dual VET via social media, highlighting employers and foundations as the most active players in this space. Other studies indirectly reference the role of foundations, noting their contributions to addressing deficiencies in areas such as business outreach, school-business coordination (Sanz de Miguel et al., 2022), and advisory services for Small and Medium-sized Enterprises (SMEs; Echeverría & Martínez, 2018). Martín-Artiles et al. (2019) briefly mention the Bertelsmann Foundation's role in promoting Dual VET, describing it as an external agent in Spain. They compare its profile to that of the Konrad Adenauer Foundation (KAS) in the past, identifying both as allies of multinational corporations aiming to promote the German VET model in Spain.

Internationally, evidence is also scarce regarding national foundations or independent entities autonomous from foreign organizations dedicated to supporting the dissemination and adoption of Dual VET. However, public development cooperation agencies from Germany, Austria, and Switzerland, as well as Central European chambers of commerce, are documented as players in promoting and introducing Dual VET in implementing countries. Langthaler (2015) emphasizes that the scope and impact of these activities vary, with German institutions

leading a broader agenda compared to their Austrian and Swiss counterparts. A review of major scientific databases highlights the involvement of German organizations in the adoption processes of Dual VET in China (Fuchs, 2022; Wiemann, 2021), Costa Rica (Schmees & Láscarez-Smith, 2024), India (Maitra et al., 2022), Mexico (Valiente et al., 2020; Vogelsang et al., 2022; Wiemann & Fuchs, 2018), Serbia (Caves & Oswald-Egg, 2023; Langthaler & Top, 2023), Russia (Remington, 2017), Tunisia (Oeben & Klumpp, 2021), and Turkey (Tui takes dual training to the Turkish Riviera, 2015). Yet, in most of these cases, the activities appear as secondary findings rather than primary research focuses. More detailed insights are available for Costa Rica and Mexico. In Costa Rica, Schmees and Láscarez-Smith (2024) identify the involvement of the Federal Institute for Vocational Education and Training (BIBB), the Federal Ministry of Education and Research (BMBF), the German Office for International Cooperation in Vocational Education and Training (GOVET), Osnabrück University, the German Agency for International Cooperation (GIZ), and the Konrad Adenauer Foundation (KAS). These organizations have played an active role in supporting implementation efforts, such as establishing a tripartite dialogue platform that brings together the government, trade unions, and employers (Schmees & Láscarez-Smith, 2024). The signing of a Memorandum of Understanding between the German and Costa Rican government further formalized collaborative initiatives, particularly for pilot projects in public VET. German organizations have also contributed through technical support, research, translation, and knowledge transfer. For instance, GIZ developed training materials for electrician programs, while KAS worked to promote Dual VET among employers and provided foundational training on its operational principles (Schmees & Láscarez-Smith, 2024). Moreover, KAS has funded training programs. Despite this visible role, Schmees and Láscarez-Smith (2024) highlight the ambivalent discourse of national authorities: While external assistance is welcomed when requested, it tends to be resisted when foreign actors attempt to take the lead. By contrast, private VET initiatives, such as those at the National Institute for Learning (INA), have explicitly praised German cooperation as indispensable for the successful transfer of the dual apprenticeship model (Schmees & Láscarez-Smith, 2024).

Regarding Mexico, Valiente et al. (2020) assert that the mobilization of knowledge by German public and private cooperation actors was crucial in convincing the Mexican government and the Chamber of Commerce of the relevance of adopting Dual VET. The German institutional actors identified include the German–Mexican Chamber of Industry and Commerce (CAMEXA), the BIBB, the GIZ, and the German Embassy in Mexico (Wiemann & Fuchs, 2018). According to Wiemann and Fuchs (2018), German organizations have been involved in negotiations and regulatory processes since the outset. The first agreement related to Dual VET, the "Sectoral Agreement" of 2020, was formulated within the Committee of the Dual Training Education Option, a body composed of stakeholders from the Mexican education and economic sectors, as well as German organizations and the German foreign

trade chamber (Vogelsang et al., 2022). This committee originated in a 2013 roundtable involving German-speaking and Mexican actors, later complemented by a smaller working group of selected German participants (Vogelsang et al., 2022). In addition to regulatory dialogue, German organizations have supported implementation by connecting companies and training centers and coordinating qualification certifications (Wiemann & Fuchs, 2018). CAMEXA, for instance, has taken a lead role in these areas. German agencies have also developed promotional materials, such as video campaigns and informational events, to raise awareness of Dual VET's benefits (Vogelsang et al., 2022).

In Austria's case, its role is documented in the Serbian adoption of Dual VET. Langthaler & Top (2023) highlights Austria's contributions through government advisory support for regulations and the Austrian Chamber of Commerce's assistance to its Serbian counterpart. Similarly, Caves and Oswald-Egg (2023), in their analysis of the same process, report the implementation of pilot projects carried out by Austrian organizations. The role of Swiss organizations is discussed in international literature in the adoption process of Dual VET in Nepal. Bolli et al. (2023) describe the collaboration between the Government of Nepal and the Swiss Agency for Development and Cooperation (SDC), under the Enhanced Skills for Sustainable and Rewarding Employment (ENSSURE) project. The specific details provided indicate that ENSSURE was implemented in close partnership with the Nepalese Council for Technical Education and Vocational Training (CTEVT) and Helvetas, a Swiss foundation dedicated to international cooperation, which offered technical support throughout the entire process (Bolli et al., 2023).

3 Method

The methodology of this analysis is qualitative. Specifically, during the data collection phase, both Document Analysis (Bowen, 2009) and semi-structured interviews (Adeoye-Olatunde & Olenik, 2021) were conducted. Content was analysed using Reflexive Thematic Analysis (RTA; Braun & Clarke, 2021).

Document Analysis involves searching for, selecting, and examining texts to assess their relevance as sources for the research, followed by detailed reading and interpretation of the data contained within them (Bowen, 2009). In this study, we applied the first three phases of Bowen's method (document search, document selection, and preliminary review) to gather relevant materials. These phases were used to collect official texts and grey literature (Schöpfel, 2011) that provide information on the role of Fundación Bertelsmann and its interaction with traditional VET governance actors in Spain from 2013 to 2022. It should be noted that this investigation forms part of a larger research project involving the collection and selection of official, regulatory, and grey literature produced by governmental, business, trade union, educational, and foundation actors during the adoption phase of Dual VET, defined

as the period from the approval of Royal Decree 1529/2012 to the enactment of Organic Law 3/2022. A total of 56 texts were collected for this project, of which 23 were used specifically to analyze the role of Fundación Bertelsmann in promoting Dual VET and its interaction with traditional governance actors. This set of 23 selected texts includes 22 pieces of grey literature (e.g., dissemination activity reports, operational guides, manuals, etc.) and one transcript prepared by the official stenographers of the Spanish Congress of Deputies. This transcript, published in the *Official Record of the Spanish Congress of Deputies* [*Diario de Sesiones del Congreso de los Diputados*] (Education and Vocational Training Committee, session no. 456, 30 June 2021), documents the testimony of the Vice President of Fundación Bertelsmann, who also represents the Alliance for Dual VET, and the Director of Fundación Bertelsmann during their appearance before the committee in 2021. These testimonies were provided as expert input during the drafting process of Organic Law 3/2022 (Fundación Bertelsmann & Alianza para la FP dual, 2021).

Regarding the semi-structured interviews (Adeoye-Olatunde & Olenik, 2021), a total of 12 were conducted. On the one hand, an in-depth interview was held with a senior representative designated by Fundación Bertelsmann as its official spokesperson for this study. On the other hand, interviews were conducted with senior representatives of the actors that form part of the VET Councils at the central, Andalusian, and Basque levels. These included representatives from government authorities, employers' organizations, trade unions, and the main associations of educational centers in these regions (present only in the Basque VET Council). Interviewees were specifically nominated by their organizations to ensure that the collected perspectives aligned with the official positions of those institutions. The semi-structured interviews took place between early December 2022 and late April 2023. Table 1 presents the anonymized list of participating actors. Anonymization was ensured through informed consent: Interviewees agreed to withhold their organization's name while allowing reference to their role. The study was approved by the Research Ethics Committee of the University of Granada (Ref. No. 3960/CEIH/2024).

Table 1: Institutional and Organisational Representatives Interviewed

<i>Category</i>	<i>Scope</i>		<i>Specific Position</i>	<i>Acronym</i>
<i>Ministry of Education (ME) -</i>	Central level (CL)		<i>Minister for Education</i>	ME1
<i>Regional Ministry of Education (RME)</i>	Autonomous Community (AC)	Andalusia	<i>Head of Service at the Ministry of Education</i>	ME2
		Basque Country	<i>Coordinator of Dual VET of the Andalusian Government</i>	RME-A

<i>Trade unions (TU)</i>	CL		<i>Vice-Minister for VET of the Basque Government</i>	RME-BQ
	AC	Basque Country	<i>Confederal Secretary for Strategic Transitions and Territorial Development</i>	TU-C
<i>Trade unions (TU)</i>	CL		<i>Head of Employment and Vocational Qualifications</i>	TU-BQ
	AC	Basque Country	<i>Head of Education and Training</i>	EC-C
<i>Employers' confederation (EC)</i>	CL		<i>Head of Education and Training</i>	EC-C
	AC	Andalusia	<i>Head of the Programmes and Projects Area</i>	EC-A
		Basque Country	<i>Head of Training, Talent and Employment Department</i>	EC-BQ
<i>VET centres (VC)</i>	CL (+ Andalusia included)		<i>President of an State Association of VET Centres</i>	VC-C
	AC	Basque Country	<i>President of an Association of VET Centres in the Basque Country</i>	VC-BQ
<i>Fundación Bertelsmann</i>	CL + AC		<i>Co-responsible for Fundación Bertelsmann</i>	FB

The data were analysed using Reflexive Thematic Analysis (RTA) as outlined by Braun and Clarke (2021), following their ten guiding principles and six analytical phases. This approach was chosen over other forms of content or thematic analysis because its reflexive orientation allows for an open-ended, iterative process in which early analyses do not predetermine the interpretation of later data. This was especially relevant in this study, which involved the combined analysis of documentary sources and semi-structured interviews.

The six phases of Reflexive Thematic Analysis were applied sequentially to both datasets. First, during the familiarisation phase, initial readings were conducted while screening and archiving the collected texts in Zotero, as well as during the transcription of the interviews. All materials were then uploaded to NVivo. In the second phase (coding), each file was thoroughly coded (e.g., positive assessments of guides and recommendations). The third phase (initial theme generation) involved grouping codes into preliminary themes through a process of ongoing reflection and restructuring (e.g., positive evaluations of dissemination activities). This was followed by a review phase to assess whether each theme captured a coherent and distinct pattern of meaning. In the refinement phase, themes were defined and named to reflect their analytical focus. Finally, in the writing phase, the results from both datasets were triangulated and integrated into a coherent narrative aligned with the study's overall objective.

4 Results

The findings are organised into three sections: 4.1 explores the foundation's internal perspective, strategy, and operations; 4.2 analyses its activities to promote duality, Dual VET, and the Spanish model; and 4.3 examines how traditional VET governance actors perceive its role.

4.1 The Strategic Positioning of Fundación Bertelsmann in the Transfer of Dual VET to Spain: Rationale and Trajectory

Unlike other German foundations, such as KAS, which operates centrally with local offices implementing headquarters-defined policies, the Bertelsmann Stiftung employs a decentralized model, granting affiliates greater autonomy to adapt to local contexts. In 2013, the newly appointed executive leadership of Fundación Bertelsmann announced its intent to "focus the organization's efforts on improving youth employment" (FB, line 4). That year, the foundation launched the "For Youth Employment" (Por el empleo juvenil) initiative, aimed at developing tools to facilitate young people's access to the labour market (Fundación Bertelsmann, 2013), within which the promotion and dissemination of Dual VET was a key component.

The analysis of Fundación Bertelsmann's discourse reveals several reasons for choosing Dual VET as the most suitable tool. A key factor was the identification of a gap in the Dual VET landscape following the rapid and hasty adoption of Royal Decree 1529/2012, which faced widespread lack of awareness, confusion, and insufficient implementation tools across the Autonomous Communities. As its spokesperson explained, "the lack of competitors in this space constituted Dual VET as a strategic opportunity to ensure the foundation's relevance and visibility" (FB, line 6). Additionally, the foundation emphasized that its leadership team's international outlook, comparative approach to addressing social challenges, and strong ties to Germany heavily influenced the initiative. Personal experiences, as the vice president's prior involvement in establishing a VET school in Mexico, further reinforced the decision (Fundación Bertelsmann & Alianza para la FP Dual, 2021).

Moreover, the evidence indicates that Dual VET is perceived by the foundation as "the most select, the best, because in some way, it is also the most natural" (Fundación Bertelsmann & Alianza para la FP Dual, 2021, p. 2). To illustrate this perspective, the vice president employs the analogy of learning to swim, arguing that theory should be learned in the morning and practiced in the afternoon, "and this is precisely what Dual VET does" (Fundación Bertelsmann & Alianza para la FP Dual, 2021, p. 2). This belief is further supported by others publications of the foundation, which frame Dual VET as a revolutionary training model and a pathway to societal success (Fundación Bertelsmann, 2022; Fundación Bertelsmann & Santodomingo, 2014).

In terms of strategy, the analysis conducted in this research shows that Fundación Bertelsmann combines direct action with efforts to influence decision-making processes. Despite operating with a small team, described by its representative as "although it might seem like we are very large, we are actually a very small team" (FB, line 506), the foundation focuses on analyzing specific territorial challenges and implementing self-financed pilot programs to address them within a limited timeframe. These pilots offered regional governments the opportunity to assess their effectiveness and, in cases of positive evaluation, to take over and expand them to other contexts using their own public resources (Fundación Bertelsmann, 2016a). According to the foundation's representative, many of these initiatives were inspired by successful Dual VET models from other countries: "The goal was to develop ideas to address challenges within the Autonomous Communities and explore their local implementation, without promoting the German model or any fixed approach, but rather drawing inspiration from those contexts" (FB, lines 176-179). The analysis reveals that positive outcomes in some regions have led other Autonomous Communities to seek support from Fundación Bertelsmann in addressing similar challenges. One example is the outreach teams program, which placed dedicated professionals in charge of connecting companies and educational centers to implement Dual VET. As the representative explained, it began with just ten technical staff and, due to its success, was progressively institutionalized: "Today, it is widely incorporated; there are funds from the Ministry and the Autonomous Communities for this. Right now, in Andalusia, there are 50 outreach technicians, 40 in Valencia, more than 30 in Catalonia..." (FB, lines 396-398).

In legal terms, the analysis identifies that collaboration with regional governments is established through written agreements granting Fundación Bertelsmann the necessary permissions to operate within each Autonomous Community's VET system. These agreements take the form of administrative collaboration arrangements rather than public sector contracts (see Consejería de Educación & Fundación Bertelsmann, 2015). These agreements typically include provisions for information exchange and the occasional use of public infrastructure to support the foundation's activities (see Consejería de Educación & Fundación Bertelsmann). This operational model is consistent with the foundation's self-described non-profit character, which emphasizes that its work is conducted "at no cost, entirely altruistically, with the aim of helping our fellow citizens" (Fundación Bertelsmann & Alianza para la FP dual, 2021, p. 1).

The findings further indicate that Fundación Bertelsmann has consistently pursued a strategy of forming alliances with other actors (Fundación Bertelsmann, 2013), including the Spanish-German Association for Technical Education, Dualiza Bankia, Mapfre Foundation, Iberian Press Group, and the Training Institute of the Baden-Württemberg Business Community. According to its representative, the foundation's goal has never been to act alone in the field of Dual VET, but rather "collectively, even if the foundation dissolved into a joint

project of all" (FB, lines 41-42). Reflecting this principle, Fundación Bertelsmann launched the Alliance for Dual VET in 2015 as a collaborative brand, in partnership with the Spanish Confederation of Employers' Organizations (CEOE), the Chamber of Commerce, and the Princess of Girona Foundation. Nevertheless, Fundación Bertelsmann has continued to lead most of its activities independently under this brand.

The overarching goal of the Alliance is "to improve the employability of young Spaniards while enabling companies to gain professionals with training more aligned to their needs" (Fundación Bertelsmann et al., 2018, p. 8). It also seeks to "bring together the best initiatives and experiences being carried out so they can converge, support one another, and expand to more companies, centers, and institutions in our country" (Fundación Bertelsmann et al., 2018, p. 8). By 2023, the Alliance had 1,479 members, including 219 business associations, 427 educational centers, 708 companies, 92 institutions (e.g., associations, regional and local governments, trade unions, and foundations), and 33 educational institutions. Again, rather than replicating foreign models, the original objectives of the Alliance emphasised the creation of a Dual VET framework adapted to the Spanish context. These objectives included establishing a national network of institutions and companies committed to quality Dual VET, promoting this tailored model, and addressing youth unemployment (Cámara de Comercio, 2015). In 2017, additional goals were introduced, such as engaging SMEs, improving regulations, and enhancing the social prestige of VET and Dual VET (Fundación Bertelsmann & Alianza para la FP dual, 2017).

4.2 Working Areas and Instruments of Fundación Bertelsmann in Dual VET

Since its creation, Fundación Bertelsmann, whether acting independently or through the brand of its Alliance for Dual VET, has carried out an intensive effort to introduce, support, and promote Dual VET at both regional and national levels. An analysis of its agenda reveals three main areas of work: (A) activities promoting and disseminating the concept of duality and the Dual VET model; (B) activities promoting and supporting the regional adoption of Dual VET, and (C) producing guides, policy proposals, and best practice publications on Dual VET.

A. Activities Promoting and Disseminating the Concept of Duality and the Dual VET Model

The analysis concludes that one of Fundación Bertelsmann's core activities is the promotion of the concept of duality, Dual VET and its best practices. Initiatives include awareness campaigns and events with regional authorities and business confederations, as well as the development of Spain's largest Dual VET platform¹. These events, such as one in Granada

¹ <https://www.alianzafpdual.es>

described as "especially warm due to the mix of small and large businesses" (RME-A, line 343), aim to inform companies about the benefits of Dual VET and encourage their involvement. The website offers public and private sections with best practice examples, a digital library, and training materials through webinars and videos (Fundación Bertelsmann, 2018; Fundación Bertelsmann & Alianza para la FP dual, 2021). Beyond these efforts, the most dissemination-focused initiatives have been the Alliance for Dual VET Forum, the Alliance for Dual VET Award, and the We Are Dual VET Ambassadors Network.

The Alliance for Dual VET Forum (*Foro Alianza para la FP Dual*), originally proposed as an annual platform for dialogue and exchange among its members (Cámara de Comercio, 2015), has become a widely recognized space for promoting duality and advocating for Dual VET. Over time, it has evolved into an open forum for stakeholders involved in VET governance across all levels and sectors, including business, government, education, and trade unions. It has also welcomed contributions from researchers, such as Philipp Gonon (Fundación Bertelsmann, 2016b). Since its first edition in 2015, titled "*I Forum of the Alliance for Dual VET: Dual Vocational Training in Spain – Cooperate to Train*", it has been held annually serving as a space for presenting projects, engaging in discussions on key challenges, and sharing best practices. In this regard, it has maintained a strong focus on regional experiences, particularly in areas such as institutional collaboration, corporate engagement, and the development of quality frameworks. While international contributions are less frequent, representatives from institutions and organisations from countries such as Germany, Switzerland, and Denmark, as well as international organizations like the EU and the Organization of Ibero-American States for Education, Science and Culture (OEI), have shared governance models, training standards, and dual VET strategies. For example, at the IV Forum (2018), German trade union representatives explained their role in shaping training regulations, protecting apprentices, and participating in company decision-making. Likewise, at the VIII Forum (2022), a speaker from the Danish National Centre for the Development of Vocational Education and Training presented *Dual VET in Denmark: Lessons for the New Spanish Context* (Fundación Bertelsmann, 2018, 2022)

Regarding the Alliance for Dual VET Award (*Premio Alianza para la FP Dual*), Fundación Bertelsmann held its first edition in 2017 "with the aim of recognizing commitment to Dual VET in Spain, giving visibility to best practices, and highlighting the actors involved" (Fundación Bertelsmann & Alianza para la FP dual, 2018, p. 7). By 2022, the award had reached its sixth edition, having recognized projects across four categories: SMEs, large companies, educational centers, and organizations. As for the We Are Dual VET Ambassadors Network (*Red de Embajadores Somos FP Dual*), this initiative has been developed in partnership with Lidl Supermarkets. The network, composed of Dual VET graduates and students, was created to engage apprentices in the dissemination of Dual VET. With the support of the Fundación Bertelsmann and Lidl's infrastructure, ambassadors organize face-to-face events

with families and students to promote Dual VET as a pathway for future studies, emphasizing the benefits they have personally gained from it. In 2018, the network grew from "45 ambassadors from Catalonia, Andalusia, and Madrid to 52 in 2019. They reached over 7,000 students through talks and social media campaigns" (Lidl Talent Manager in Fundación Bertelsmann, 2019, p. 36).

B. Activities Promoting and Supporting the Regional Adoption of Dual VET

Fundación Bertelsmann has supported the adoption of Dual VET through several initiatives, each implemented as an innovative pilot programme introducing support mechanisms with the approval of the respective Autonomous Communities. When successful, at the conclusion of the pilot phase, the foundation provided the necessary tools and frameworks for regional ministries to assume responsibility and expand these programmes using their own resources, as outlined in the previous section. The analysis identifies four key initiatives: (A) technical advisory services; (B) training for company tutors; (C) introducing shared external tutors for SMEs, and (D) promoting local government involvement as drivers of Dual VET.

The (A) technical advisory program was designed to address a critical challenge: "Teachers were required not only to present Dual VET projects but also to find companies, monitor progress, and visit them. (...) Much of this responsibility relied on voluntary effort, outside teaching hours, and often without adequate preparation" (FB, lines 378-380). To respond to this, Fundación Bertelsmann, through its Alliance for Dual VET brand, has provided "technical advisory services for companies and educational centers since 2015" (Fundación Bertelsmann et al., 2018, p. 5). Advisors in this program, together with "a technical office to assist companies starting with Dual VET" (Fundación Bertelsmann & Alianza para la FP Dual, 2021, p. 2), have focused on outreach, regulatory and administrative support, and connecting centers and companies within the system. As a result, in its first four years, "300 companies that did not previously offer Dual VET incorporated apprentices; 70 sectoral associations launched Dual VET projects; and 50 educational centers introduced new training programmes" (Alianza para la FP dual, 2019, p. 1).

Regarding (B) training for company tutors, the programme aimed to deepen understanding of Dual VET and provide them with tools for planning, implementation, and monitoring. Although comprehensive data is fragmented, regional figures are available; such as the 17 tutors trained in Aragón during the 2017 academic year (Fundación Bertelsmann, 2017). As for (C) introducing shared external tutors for SMEs, the first pilot programme (later extended to other areas such as Gijón) was launched in 2018 and completed in 2020 in collaboration with the Guild of Installers of Northern Barcelonès and Baix Maresme (AEMIFESA). This initiative introduced a figure who ensured effective, high-quality participation of small and micro enterprises in all phases of Dual VET, centralising their communication with the educational centre. A replication manual was later produced to support the programme's adaptation elsewhere (Fundación Bertelsmann, 2021c). Finally, for (D) promoting local government involvement

as drivers of Dual VET, the first pilot experience was carried out with the municipality of Dos Hermanas (Andalusia), aiming to position it as a facilitator and promoter of Dual VET in its local context. The pilot resulted in a summary guide for other local authorities, based on the outcomes of the initiative (Fundación Bertelsmann, 2021b).

C. *Guides, Proposals, and Best Practices for Disseminating the Concept of Duality and Supporting the Adoption of Dual VET*

Fundación Bertelsmann reports producing "more than two dozen publications on topics relevant to the successful introduction of Dual VET in our country" (Fundación Bertelsmann & Alianza para la FP dual, 2021, p. 2). An analysis reveals that ten of these publications focus directly on the adoption of Dual VET and the transfer of the concept of duality. Five of them are particularly significant, in addition to the two publications already mentioned in the previous section as outputs of the pilot programmes.

First, in 2016, Fundación Bertelsmann created the *Basic Guide to Dual Vocational Training* (Fundación Bertelsmann, 2016a). This guide explains what Dual VET is and the opportunities it offers to educational centers, companies, and apprentices, while also reviewing the legal framework in effect at the time. In 2017, they published *Regulatory Proposals: Improvements in the Legal Framework to Ensure the Development of Robust and High-Quality Dual Vocational Training* (Fundación Bertelsmann & Alianza para la FP dual, 2017). This document identifies deficiencies in the existing national legal framework and outlines systematic proposals for improvement.

In 2018, the manual *How to Promote Dual VET? A Practical Guide for Advisors of Companies and Educational Centers* was published with the aim of disseminating this support role across the Autonomous Communities (Fundación Bertelsmann et al., 2018). In 2021, other notable documents were released, such as *Methodological Guide and Best Practices: Promoting Dual VET through Business Organizations* (CEOE & Fundación Bertelsmann, 2021) and *How to Explain Dual VET to...? Key Messages to Convince Stakeholders* (Fundación Bertelsmann, 2021a).

Finally, Fundación Bertelsmann has also disseminated examples of best practices through publications. In 2021, in collaboration with the Ministry of Education and VET, published two significant works. The first publication, titled *Executive Summary. International Report on the Quality of Dual VET in Spain* (Ministerio de Educación y Formación Profesional & Fundación Bertelsmann, 2021b), analyzes the quality of Dual VET implementation in Denmark, the Netherlands, Portugal, and Switzerland. According to its authors, the aim was not to conduct an in-depth analysis of these systems but to highlight best practices and assess their potential transfer to Spain. The second publication, *Good Practices in Dual Vocational Training in Spain: 14 European Quality Indicators, 102 Regional Examples* (Ministerio de Educación y Formación Profesional & Fundación Bertelsmann, 2021a), focused "on identifying quality elements in the models developed across the different Autonomous Communities and in the autonomous cities of Ceuta and Melilla" (Ministerio de Educación y Formación Profesional & Fundación Bertelsmann, 2021a, p. 10).

4.3 Evaluation of Fundación Bertelsmann's Role by Traditional Governance Actors in VET at the Central, Andalusian, and Basque Levels

This section examines how traditional governance actors in VET at the central, Andalusian, and Basque levels have evaluated Fundación Bertelsmann's role in the adoption of Dual VET. Their evaluations reflect two main perspectives: Acknowledged contributions and added value, and perceived lack of influence and questionable practices.

A. *Acknowledged Contributions and Perceived Added Value*

The actors contributing to this positive assessment, albeit with varying degrees and scope, and without precluding their involvement in more critical evaluations (see next section), include representatives of business organizations at the central, Andalusian, and Basque levels, the state association of VET centres, the central-level trade union, the Ministry of Education, and the Andalusian Ministry of Education. As for the overall recognition of its strategic role and agenda, the most explicit praise for Fundación Bertelsmann comes from representatives of business organizations at the central and Andalusian levels. Specifically, the national business confederation described the work carried out as "brilliant and spectacular" (EC-C, line 420).

The activities referenced by these actors include: (i) The creation of guides, reports, and data analyses on the adoption of Dual VET in Spain; (ii) the establishment of technical advisory and outreach teams; and (iii) campaigns to promote Dual VET through forums, events, social media, and publications. Regarding the guides (i), representatives of business confederations at the central, Andalusian, and Basque levels, alongside the central-level trade union, commend the foundation's ability to produce recommendations, action guides, and, particularly, reports and data analyses. Among these, the representative of the central-level business confederation highlights one publication as especially helpful to them and their regional affiliates during the adoption of Dual VET: *Methodological Guide and Best Practices: Promoting Dual VET through Business Organizations* (CEOE & Fundación Bertelsmann, 2021). However, the central-level trade union representative offers a nuanced view of the foundation's publications, noting an initial phase marked by strong disagreement and a later phase of greater alignment. They attribute this change to the foundation's deeper engagement with the Spanish context, which led to a more critical and locally adapted discourse.

Regarding the second type of activities positively assessed by the actors (ii), representatives of the Andalusian Ministry of Education and the state association of VET centres emphasize the support provided by the foundations' technical advisory and outreach teams. Illustrating this, the representative of the Andalusian Ministry of Education highlights that, during an initial stage (prior to the deterioration of the symbiotic relationship between the two) Fundación Bertelsmann played a significant role in outreaching and connecting Andalusian VET centers with companies. They noted: "Especially private and semi-private centers benefited greatly from these relationships; public ones, not so much" (RME-A, lines 249-250).

Finally, concerning the promotion of Dual VET through forums, events, workshops, social media, and outreach publications, representatives from the state association of VET centres and the Ministry of Education note that, although they do not consider these activities decisive for the adoption of Dual VET, they "generated the necessary buzz for transformation" (ME2, line 306). According to the representative of the national association of educational centers, "everything adds up: the various congresses, workshops, seminars, even some publications, the ambassadors..." (VC-C, lines 129-130).

B. Perceived Lack of Influence and Questionable Practices

The actors who have highlighted the inefficiency or lack of influence of the foundations' role in adopting Dual VET include representatives from the Ministry of Education, the Andalusian Ministry of Education, the central-level trade union, the state association of VET centres, and all Basque actors. The analysis identifies three main themes: (i) Limited or no influence on other actors and the adoption process, (ii) overlap between their interests and those of the business sector, and (iii) alleged poor practices by Fundación Bertelsmann in specific contexts.

Regarding the first theme (limited or no influence), representatives from the Ministry of Education, the Andalusian Ministry of Education, the central-level trade union, the state association of VET centres, and all Basque actors consistently highlight the foundations' minimal impact on their own perspectives during the adoption of Dual VET. The Ministry of Education's representative asserts that within their institution "there is no influence from Dualiza Bankia or Fundación Bertelsmann (...). They invite us, they invite the ministry, and the Minister attends, the Secretary attends... But they have had no influence" (ME2, lines 288-290). Similarly, the representative of the state association of VET centres points out that, although the foundations offered support to certain educational centres, their overall influence remained limited given the vast scale and complexity of the Spanish VET system. In the Basque Autonomous Community, actors unanimously assert that Fundación Bertelsmann had no influence, as their model was established before the foundation's involvement. Representatives from the Basque Ministry of Education, employers' confederation, VET centers association, and trade unions emphasize that the region's collaborative network addressed challenges internally without external support. The Basque Ministry of Education representative likens external aid from foundations to "prepackaged or canned food" (RME-BQ, line 384), calling it unviable and unsuitable.

In the second theme (alignment with business interests), concerns were raised by representatives from the Andalusian Ministry of Education, the Basque trade union, and, to a lesser extent, the Basque VET centers association. The Basque VET centers association's representative warns that such foundations may hinder the educational system's focus on student-centered approaches, which prioritize meaningful learning experiences. The Andalusian Ministry of Education and the Basque trade union are more categorical, criticizing the

foundations for promoting a business-centric narrative that prioritizes corporate needs above all else. The trade union representative describes this approach as dangerous and misleading, while the Andalusian representative argues that private sector funding inevitably prioritizes business interests. Both stress the need for counterbalances: The Andalusian Ministry of Education emphasizes the public education system's role as a counterweight to corporate influence, while the Basque trade union highlights the importance of unions in limiting the power foundations wield over governments and policy-making.

Finally, in the third theme (alleged poor practices by Fundación Bertelsmann), the representative of the Andalusian Ministry of Education accuses the foundation of undermining its efforts during the initial implementation of Dual VET, leading to conflicts with VET centers. The representative highlights two key issues: First, the foundation prioritized tasks from its 2015 agreement with centers aligned with the Alliance for Dual VET. Second, it allegedly provided insufficient guidance for Dual VET projects, focusing on funding and teaching hours rather than addressing students' needs and interests.

5 Discussion and Conclusion

From a theoretical perspective, this research highlights how Fundación Bertelsmann serves as a clear example of the policy entrepreneur figure, as thoroughly defined by Roberts and King (1991) and referenced as actors in policy transfer by Dolowitz and Marsh (2000). The evidence generated through the analysis supporting this classification indicates that Fundación Bertelsmann has launched a variety of initiatives and employed a systematic, multi-level strategy to promote and support the implementation of an innovative idea in the public practice of the Spanish education sector: Dual VET and the concept of duality. After its adoption at the central level under EU pressure (Martín-Artiles et al., 2020), the decision on whether or not to implement Dual VET was left to the Autonomous Communities, with little guidance on how to develop regional systems. Regional actors often lacked knowledge about both the central initiative and the concept of duality itself (Martínez-Izquierdo & Torres-Sánchez, 2024). It is in this context, where Fundación Bertelsmann emerged as a policy entrepreneur. This reality surpasses the definition provided by Roberts and King (1991), which characterizes policy entrepreneurs primarily as individuals. It is demonstrated that certain entities employ internal strategies that position them as policy entrepreneurs. In this regard, the activities undertaken by Fundación Bertelsmann in the process of adopting Dual VET align more closely with the construct of "policy transfer entrepreneurs" articulated by Stone (2012, p. 494). This construct is further complemented here by offering a perspective that emphasizes national entities, in contrast to the predominantly transnational focus that characterises Stone's original formulation.

At this juncture, it is crucial to discuss the nature of Fundación Bertelsmann. Martín-Artiles et al. (2019) draw a parallel between its idiosyncrasy in Spain and that of KAS, identifying both as foreign agents allied with multinational corporations, sharing the objective of

promoting the implementation of the German VET model in Spain. However, the analysis conducted in this research concludes that, unlike KAS, which operates centrally, with local offices implementing policies defined by its headquarters in Germany, Fundación Bertelsmann operates in Spain with full autonomy from Bertelsmann Stiftung. Consequently, beyond its source of funding, Fundación Bertelsmann emerges as a pseudo-national foundation whose decision-making and strategy development are carried out at its Spanish headquarters and tailored to the local context. Within this operational framework, the Spanish subsidiary's leadership chose to focus on Dual VET based on its own strategic decisions. These decisions were rooted in local considerations, such as the niche of activity unaddressed by public authorities, the opportunity for increased visibility, and the management team's belief in Dual VET. The analysis shows that Fundación Bertelsmann focused on promoting a quality Dual VET model adapted to the Spanish context, mainly highlighting national and regional best practices, while drawing inspiration from other countries but rejecting direct imitation.

Continuing the theoretical analysis, the research on Fundación Bertelsmann's activity reveals evidence of three of the four activity types theorized by Roberts and King (1991): Creative or intellectual, strategic, and mobilization and execution activities. Most evidence falls under mobilization and execution, including alliance-building with influential actors, launching pilot projects, and lobbying efforts. The alliance-building efforts (Roberts & King, 1991) are most notably represented by the creation of the Alliance for Dual VET in 2015. This initiative brought together the national employers' confederation, the Chamber of Commerce, and the Princess of Girona Foundation, which maintains close ties with the Spanish Royal Family. This activity enabled Fundación Bertelsmann to establish synergies with business representatives with extensive experience in VET and its governance, thereby indirectly accessing influential positions. In this regard, the international literature on the adoption processes of Dual VET has not yet reported evidence of a similar formal strategy developed by local actors or by foreign organizations.

The implementation of innovative pilot projects that introduced support mechanisms for Dual VET, later adopted on a permanent basis by regional public administrations, constitutes one of the initiatives through which Fundación Bertelsmann has engaged in what Roberts and King (1991) classify as mobilization and execution activities. This includes programs such as technical advisory services, training for company tutors, creating external tutor roles for SMEs, and empowering municipalities to promote Dual VET locally. No evidence exists of other national foundations undertaking similar efforts in Dual VET adoption. However, parallels can be drawn with Central European agencies and organizations that have also used pilot projects, primarily focused on specific training programs, as seen in Serbia (Caves & Oswald-Egg, 2023) and Costa Rica (Schmees & Láscares-Smith, 2024). Additionally, initiatives by Central European agencies show similarities. For instance, CAMEXA in Mexico systematically connects businesses with educational institutions

(Wiemann & Fuchs, 2018), while HELVETAS in Nepal provides technical support throughout the adoption process (Bolli et al., 2023), resembling Fundación Bertelsmann's technical advisory program.

When it comes to lobbying activities, the results show that Fundación Bertelsmann has engaged in a variety of efforts theorized by Roberts and King (1991). These include promoting Dual VET among local employers in collaboration with regional governments, launching the Alliance website, publishing guides, and organizing annual events like the Alliance for Dual VET Forum, Award, and the 'We Are Dual VET Ambassadors' network. Internationally, no similar efforts by national foundations are documented, but parallels exist with knowledge transfer initiatives by Central European agencies. For example, these activities resemble video campaigns and informational events by German cooperation agencies during Mexico's adoption of Dual VET (Vogelsang et al., 2022). However, this Mexico's evidence underscores Fundación Bertelsmann's more comprehensive strategy in Spain. Similarly, its guides, website content, and best practice sharing align with KAS and GIZ efforts in Costa Rica, including Dual VET training and electrician material development (Schmees & Láscares-Smith, 2024).

Perceptions of Fundación Bertelsmann's role vary significantly among stakeholders. While the business sector views its work as outstanding, exemplary, and indispensable, other groups hold more critical perspectives. The activities most positively highlighted by stakeholders include the creation of guides and analyses, along with its advisory programs, which have helped foster agreement among business organizations, trade unions, governments, and educational centers. Similarly, representatives from the national association and the Ministry of Education acknowledge that, while these efforts were not particularly fundamental or influential for them, the lobbying activities contributed to generating momentum for change. In contrast, three groups, represented by the Basque trade union, the Andalusian Ministry of Education, and the Basque VET centers association, express their aversion to such foundations, arguing that they overly represent business interests and serve as counterweights to public interests and students. This critique is reinforced by reports of poor practices in Andalusia. According to the representative of the Andalusian Ministry of Education, although Fundación Bertelsmann initially performed well, it later prioritized its own interests in fulfilling the bilateral agreement, leading to conflicts that strained the relationship. International literature reveals a similar trend: In Costa Rica, local authorities have tended to downplay or reframe the role of initial external assistance in order to present dual training as a nationally grounded initiative, while private VET initiatives, such as those at the INA, have praised German cooperation as essential for the successful transfer (Schmees & Láscares-Smith, 2024). Finally, reflecting the diverse realities of Spain's decentralized educational system, Basque actors remain the most critical. They reject any influence from the foundation, describing their model as independent,

local, and closed to external organizations, which they dismiss as "prepackaged or canned food" (RME-BQ, line 384).

Future international research should focus on a detailed analysis of the activities carried out by national actors, particularly those outside traditional VET governance frameworks, in the specific processes of Dual VET adoption globally. This research should aim to define the role of policy entrepreneurs in facilitating the transfer of knowledge in Dual VET adoptions. Such studies would not only improve the understanding of these processes but also provide a more nuanced theoretical comprehension of the actors involved and the specific activities that enable knowledge transfer in Dual VET adoption processes. In Spain, further research should be conducted to overcome the methodological and scope limitations of this study by including other Autonomous Communities and additional actors, such as VET teachers from schools that have directly participated by receiving guidance or outreach support from the foundation. This would enhance the understanding of how policy entrepreneurs influence knowledge transfer in decentralized states with varying educational competencies.

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Ethics Statement

This research has been positively evaluated and authorised by the Research Ethics Committee of the University of Granada under the favourable report 3960/CEIH/2024.

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Biographical Notes

Luis Martínez Izquierdo, PhD, is a Juan de la Cierva Postdoctoral Researcher in the Department of Theory and History of Education, Social Pedagogy and MIDE at the University of Málaga, Spain, and a member of the Educational Policies and Reforms research group. His research focuses on vocational education and training, comparative education, policy transfer, and education policy.

Mónica Torres Sánchez, PhD, is Associate Professor of Educational Sciences in the Department of Theory and History of Education at the University of Málaga, Spain. Her research interests include the politics of vocational education and the implementation of Dual VET in Spain. She currently leads a project on Dual VET in the training of early childhood educators in Andalusia.