

STRUCTURES AND CHARACTERISTICS IN BASIC EDUCATION: A
COMPARATIVE ANALYSIS OF GERMAN, BRAZILIAN AND ITALIAN
EDUCATIONAL SYSTEMS

*ESTRUTURAS E CARACTERÍSTICAS DA EDUCAÇÃO BÁSICA: UMA ANÁLISE
COMPARADA DOS SISTEMAS EDUCACIONAIS ALEMÃO, BRASILEIRO E
ITALIANO*

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COMPARATIVO DE LOS SISTEMAS EDUCATIVOS ALEMÁN, BRASILEÑO E
ITALIANO*



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ABSTRACT: This paper aims to analyze the structure of the German, Brazilian, and Italian educational systems in Basic Education. The theoretical references used are the official documents of these countries. The methodological procedures are based on Comparative Education, and data analysis is carried out from aspects of hierarchical organization, funding, and challenges. These divergences can be understood by considering each nation's political, historical, economic, and social realities. The data point to the undeniable constitutional right to education as a common aspect. However, it is necessary to emphasize that the establishment of this right in the Constitution does not guarantee the quality and effectiveness of the educational system. As a final consideration, it is necessary to recognize that, despite these similarities and constitutional objectives, the effectiveness in implementing and achieving these objectives may vary due to factors such as available resources, social inequalities, and structural challenges in each national context.

KEYWORDS: Comparative education. Educational system. Basic Education.

RESUMO: Este artigo tem por objetivo analisar a estrutura dos sistemas educacionais alemão, brasileiro e italiano na Educação Básica. Os referenciais teóricos são os documentos oficiais desses países. Os procedimentos metodológicos se baseiam na Educação Comparada e a análise de dados é realizada a partir dos aspectos da organização hierárquica, financiamentos e desafios. Essas divergências podem ser compreendidas à luz das realidades políticas, históricas, econômicas e sociais de cada nação. Os dados apontam o inegável direito constitucional à educação como um aspecto comum. No entanto, é necessário destacar que o estabelecimento desse direito nas Constituições não garante a qualidade e a efetividade do sistema educacional. Por fim, é necessário reconhecer que, apesar dessas similaridades e objetivos constitucionais, a efetividade na implementação e realização desses objetivos pode variar devido a fatores como recursos disponíveis, desigualdades sociais e desafios estruturais em cada país.

PALAVRAS-CHAVE: Educação comparada. Sistema educacional. Educação básica.

RESUMEN: Este artículo tiene como objetivo analizar la estructura de los sistemas educativos alemán, brasileño e italiano en Educación Básica. Las referencias son los documentos oficiales de estos países. La metodología se basa en la Educación Comparada y el análisis de datos se realiza con base en aspectos de organización jerárquica, financiamiento y desafíos. Estas divergencias pueden entenderse a partir de las realidades políticas, históricas, económicas y sociales de cada nación. Los datos señalan el innegable derecho constitucional a la educación como un aspecto común. Sin embargo, es necesario resaltar que el establecimiento de este derecho en las Constituciones no garantiza la calidad y eficacia del sistema educativo. Finalmente, es necesario reconocer que, a pesar de estas similitudes y objetivos constitucionales, la efectividad en la implementación y el logro de estos objetivos puede variar, debido a factores como recursos disponibles, desigualdades sociales y desafíos estructurales en cada contexto nacional.

PALABRAS CLAVE: Educación comparada. Sistema educativo. Educación básica.

Introduction

Historically, the fundamental role of education in human development and the construction of more just and sustainable societies has been recognized. Education is responsible for promoting access to knowledge, developing skills and competencies (Brazil, 2018), and fostering the formation of ethical and civic values. However, globalization has had significant impacts on the educational system, as it brings both challenges and opportunities for education, with the need to prepare individuals for an increasingly complex and interdependent world.

On the one hand, there is a greater availability of educational resources and information from different parts of the world, expanding learning possibilities. On the other hand, there is an increase in inequalities and pressures for the homogenization of educational systems, privileging certain knowledge and values over others. The pressure exerted by international organizations, such as the World Bank, UNESCO, and the IMF, among others, aims to guide nations and their policymakers to adopt agendas that are of interest to these agencies and the people and groups that lead them. The creation of international assessments, such as PISA, produces a ranking of participating countries, demonstrating that certain systems perform better than others, so that nations with lower results would try (or should try) to imitate those that are more successful, often without success.

In addition, socio-economic and cultural transformations have been observed, requiring a re-evaluation of educational objectives and practices so that individuals can develop the necessary competencies to overcome the challenges and seize the opportunities of this context, becoming global citizens.

The concept of global citizenship aims to form a citizen who has a critical stance, an awareness of different global realities, and a greater awareness of cultural, social, and ethical aspects (Morosini, 2018). It is a citizen who recognizes that they belong to an interconnected world, but with a multifaceted identity influenced by local, regional, and global aspects, and who knows how to navigate different environments and cultures, understanding that these are different and must be respected, without being considered inferior or superior.

In this context, it is essential to understand how the educational system functions at the macro and micro levels as a prerequisite for promoting effective and quality education. By understanding the mechanisms and structures that permeate the educational system, it is possible to identify its potential, challenges, and limitations and develop more appropriate and

effective educational strategies and policies. This involves analyzing the organizational, administrative, curricular, pedagogical, and social aspects that influence educational practices. Additionally, understanding the school system also implies recognizing the diversity of contexts and realities present in schools, considering the specific characteristics of students, their individual needs, as well as the social, cultural, and economic issues that impact their learning process.

To deepen the knowledge about the curricular and hierarchical organization in the field of education, a comparative study of the educational systems of Brazil, Germany, and Italy was conducted, focusing on Basic Education. The goal is to analyze the structure of these systems and attempt to identify similar and different elements from official documents that help to understand how the hierarchical structure and financing determine certain aspects of education.

Delimitations of the Study

To achieve a comprehensive understanding of the various facets of the educational systems under analysis, it is crucial to consider the contexts in which they are embedded. It is fundamental to understand how a country's governmental structure is organized in order to identify which state bodies are responsible for education and their respective roles.

It is necessary to clarify that the selection of the countries for this study was primarily based on the school system's organization in the region where the researchers are based, which is intrinsically linked to its history. The *Médio Vale do Itajaí*, where the Regional University Foundation of Blumenau (FURB) is located, was colonized by immigrants from various European countries, particularly Germany and Italy. German immigrants predominantly settled in the cities of Blumenau and Pomerode, and some units of their municipal education systems offer bilingual education in German, while in others, the language is taught as a foreign language. The municipalities of Rodeio and Ascurra, with a significant presence of descendants of Italian immigrants, particularly from the Trentino region, offer Italian as a foreign language in some municipal schools and have projects for bilingual education in Portuguese and Italian. Additionally, there is a significant cultural exchange between these cities and municipalities in Germany and Italy. Thus, understanding the educational systems of these countries and comparing them to Brazil's is important for deepening research and rethinking local public policies.

Given the complexity of the systems involved in this analysis, the first challenge was determining which aspects to consider, as these three systems are regulated and organized in distinct ways. Therefore, a detailed analysis of the years equivalent to Brazil's elementary education (from 1st to 9th grade) in Germany and Italy was decided upon. However, during the development of the research, aspects of early childhood education and high school had to be considered in order to better understand the elementary education systems of the countries analyzed, as these are the stages preceding and following the object of this research and, thus, influence the system in a broader way.

Additionally, it is important to highlight that some of the data provided by the aforementioned governments are not broken down by year. For example, information on funding allocated to schools considers the entire educational system without specifying the distribution for different school cycles.

Comparative studies allow for an understanding of the diverse educational approaches and practices adopted in different countries and contexts. Through comparative analysis, it is possible to identify similarities, differences, and patterns in educational systems, policies, curricular structures, teaching methods, and learning outcomes. This approach enables a more critical and contextualized evaluation of academic policies and practices, providing valuable insights for the development of more informed and effective educational policies. Furthermore, comparative studies contribute to the theoretical and methodological enrichment of the field of education, offering a broader framework for understanding the challenges and opportunities faced by educational systems worldwide.

Thus, comparative studies contribute to the promotion of knowledge exchange, the improvement of educational policies, and the pursuit of quality and equitable education on a global scale. According to Franco (1992), it is through a comparative process that differences and similarities can be perceived, allowing one to understand “the other from within itself and, by exclusion, to perceive oneself in the difference” (Franco, 1992, p. 14, our translation).

Marshall (2019) explains that, over the years, several scholars have debated whether comparative education should be considered a discipline, a field of study, an approach, or a method. However, it is concluded that there is no single method applied to comparative education.

According to the author, many scholars agree that comparative education is a subfield of Education Studies, as it explores a wide range of issues and is utilized by many disciplines.

The main advantage of the field lies in its multidisciplinary approach and the variety of theoretical frameworks used in research (Marshall, 2019).

In this sense, we base our understanding on Epstein's (1992, p. 409) definition, which describes comparative education as "a field of study that applies theories and social scientific methods to international education issues". For Marshall (2019), the primary objective of comparative education is still to learn from the achievements and mistakes of others and to examine educational issues from a global, rather than ethnocentric, perspective.

In reviewing the evolution of comparative studies, Carvalho (2014) points out that the different theories, methods, and approaches that have characterized comparative studies over the years can be grouped into two segments: one with a micro-analytical focus, aiming to understand education through an intranational approach, and another with a macro-analytical focus, addressing the subject from a transnational, global, or international perspective, emphasizing the influence of politics and economics on education. Based on these groupings, the author proposes the adoption of a dialectical perspective in comparative studies, avoiding a one-dimensional stance and identifying both the specific factors unique to each education system as well as those common and global factors that permeate education as a whole.

In this study, we seek to identify similarities and differences between the systems, considering both intranational aspects as well as transnational factors, such as the influence of the European Union and other international mechanisms on the education systems of Germany, Italy, and Brazil.

Hierarchical Organization

Table 1 presents a simplified, yet accurate, version of the government hierarchy responsible for education in the three countries analyzed. It is important to note that this representation aims to provide an overview of the system without reflecting the full complexity of each country's governmental structure.

Table 1 – Hierarchical Organization of Educational Systems

Level/Country	Germany	Brazil	Italy
National or Federal	“ <i>Bundesministerium für Bildung und Forschung</i> ”: regulatory and control jurisdiction/responsibilities.	Ministry of Education: organizes the structure and curriculum. It is responsible for the federal education system.	“ <i>Ministero dell’Istruzione e del Merito</i> ”: executes the functions and activities of the State regarding school education, curriculum, training objectives, among others.
State	Ministries of Education and Cultural Affairs (“ <i>Bildungsministerien</i> ”): cultural sovereignty of the 16 states (“ <i>Kultur Hoheit</i> ”).	State Department of Education: is responsible for the state education system. The public schools in this system are governed by state authorities.	The regions have concurrent legislative powers in matters of education (both the State and the Regions) and exclusive legislative powers in matters of education and vocational training.
Local	Local Authority Districts (Municipality): provide the external framework → the school building and the support staff requirements (non-teaching staff).	Municipal Department of Education: is responsible for the municipal education system. The public schools in this system are governed by municipal authorities.	Municipalities and provinces are responsible for maintaining infrastructure and support services, such as transportation and food. Provinces are responsible for secondary education, and municipalities are responsible for early childhood education and primary education.
School	Implement the guidelines given by the state in the curricula.	Principal: the schools are administered by principals elected by the community or appointed by the executive branch. The principals administer the schools through a work plan with the municipality.	Public educational institutions have educational, organizational, research, experimentation, and development autonomy.

Source: Authors' elaboration (2024).

An important aspect to highlight is that Italy, unlike Brazil and Germany, which have political divisions at federal, state, and municipal levels, has a distinct administrative structure as it is not a federal republic. According to Articles 114 and 116 of the Italian Constitution, Italy has a central national government and 20 regional governments, which are subdivided, except in the case of the region of Valle d'Aosta, into metropolitan cities and provinces. These, in turn, are divided into *comunas*, equivalent to municipalities in Brazil. Among the regions, five have special status, providing specific conditions for autonomy. For example, the Trentino-Alto Adige/Südtirol region consists of two autonomous provinces with special status (Itália,

2023a). This political structure must be considered for a proper understanding of the organization of the Italian educational system.

In this regard, it is essential to emphasize the need for a thorough analysis when conducting a case study, considering the established objectives and the organizational structures that support them. This approach allows for the identification of significant similarities among the three countries in various aspects, as well as marked distinctions. These differences can be understood in light of the political, historical, economic, and social realities of each nation.

When examining the educational systems in question, it is necessary to pay attention to the specific contexts in which they develop. Educational policies are shaped by intrinsic factors in each country, such as their governmental structures, historical experiences, and socioeconomic challenges. These elements are crucial in defining the approaches adopted by the educational systems and how they are implemented.

Therefore, when analyzing the similarities and differences between the educational systems of Brazil, Germany, and Italy, it is essential to consider the contextual nuances that influence education in each country. This allows for a more comprehensive understanding of the complexities and particularities of each system, providing a more complete and informed view of the educational dynamics under study.

In Brazil, at the federal level, the Ministry of Education is responsible for organizing the country's educational structure and curriculum plan. In this context, the existence and importance of the National Common Curricular Base (BNCC) stand out, a national document that must be followed by all states and municipalities (Brasil, 2018).

The BNCC is responsible for establishing the minimum curriculum to be adopted by schools, covering from early childhood education to the end of primary education, i.e., high school. It aims to guide the contents, skills, and competencies that must be addressed throughout the students' educational journey. Although the BNCC represents an effort to standardize and establish common guidelines for education in the country, it is essential to recognize that its implementation and effectiveness face significant challenges. The diversity of social, economic, and cultural realities across different states and municipalities in Brazil can hinder the uniform application of the proposed curriculum.

Furthermore, the BNCC is just one of the elements that make up the Brazilian educational landscape. Other factors influencing education, such as teacher training, school infrastructure, availability of educational resources, and local policies, must be considered for a broader, more critical analysis of the country's educational situation. Therefore, while the

BNCC is relevant in defining the minimum curriculum in Brazil, it is essential to acknowledge that its implementation and impact are influenced by a range of contextual factors and practical challenges that may affect its effectiveness and scope throughout the entire country.

At the state level, school education in Brazil is organized by the State Education Departments. According to item VI of Article 10 of the Law of Guidelines and Bases of Education (LDB), among other responsibilities, states are tasked with "ensuring elementary education and offering, as a priority, secondary education to all who demand it" (Brasil, 1996, our translation). The State Education Departments manage the state schools and are also responsible for supervising private schools that offer primary and secondary education.

At the local level, each municipality has its representative, notably the Secretary of Education. According to item V of Article 11 of the LDB, public schools at the local level must offer early childhood education and, as a priority, elementary education. Similar to state authorities, local authorities are also responsible for overseeing private schools, but at the local level. They are required to ensure compliance with regulations regarding early childhood education and elementary education.

In Brazil, each school has a principal responsible for its management. In public schools, in some networks, these principals are elected by the school community, which includes parents, students, and staff. In other networks, the position is appointed by the head of the executive branch or the Secretary of Education. There are also positions filled through public competition (Assis, Marconi, 2021; Paro, 2011). Principals hold a crucial role in school administration, working alongside the municipality or state and following the guidelines established in the national education plan.

Public school principals are tasked with developing a work plan that guides the activities and functioning of the institution. This plan is created taking into account the specific needs of the school community, as well as the objectives and guidelines set by the municipality and the national education plan. This autonomy granted to the principals aims to promote participatory management and engage the school community in decisions related to the educational process. In addition to pedagogical and didactic matters, the principal is also responsible for managing all processes and infrastructure and overseeing the work of the entire staff, whether teaching, technical, or support personnel within the school unit (Paro, 2015).

Through direct election, the goal is to ensure that principals are legitimate representatives of the community, capable of understanding local demands and needs. However, this does not necessarily mean that the management will be successful. The election

reflects the community's will, not merely the executive branch's political and often electoral interests (Assis; Marconi, 2021; Paro, 2011). Nevertheless, the effectiveness of school management can vary widely, depending on the availability of resources, the training of principals, and the socioeconomic conditions of the region.

Additionally, the support and monitoring provided by the municipality are crucial to ensure that principals have the necessary support to effectively implement their work plans. In summary, public-school principals in Brazil play a fundamental role in educational management, collaborating with the municipality and state while following national guidelines.

In Germany, differences can be observed regarding the hierarchical organization of administrative functions. The primary responsibilities for establishing educational standards lie within the states, known as the *Bundesländer* (Deutschland, 2013, 2023a). The authority of the German federal government, the *Bundesministerium für Bildung und Forschung* is primarily regulatory and control-based. The cultural sovereignty substantiates this, or *Kultur Hoheit*, of each of the 16 states, which results in each state having its own Ministry of Education and Cultural Affairs. To ensure the comparability of education across Germany, the ministers meet four times a year at the Conference of Education Ministers, known as the *Kultusministerkonferenz*.

Despite this effort to maintain a certain level of homogeneity between the German states, some differences must be considered. Generally, the German education system consists of an elementary school (*Grundschule*) lasting four years, although the states of Berlin and Brandenburg opt for a six-year duration. A point of significant controversy when analyzing the German education system arises at the end of elementary school, when students are typically around 10 years old. They are divided into three groups based on their performance during the early school years (Deutschland, 2021).

Those with lower academic performance are directed to the lower secondary school (*Hauptschule*), which lasts between five and six years. The goal of education at this type of school is to prepare students for the labor market and to equip them for admission to vocational education. It serves as a workforce provider for the country's industries.

Students with average performance are directed to *Realschule*, which blends technical and scientific education. The program typically lasts six years, and upon completion, students obtain a certificate that allows them to either continue in a vocational education institution or proceed to the equivalent of high school by studying an additional three years at the *Gymnasium* (Deutschland, 2021).

Students with better academic performance are directed to the *Gymnasium*, which typically lasts eight or nine years and aims to provide a comprehensive education, preparing students for higher education. Upon completion, *Gymnasium* students must take an exam, known as the *Abitur*, which can only be taken once and whose score will be used for university admission.

The decision regarding which type of school a student will attend varies from state to state, but it is generally based on a recommendation from the teacher to the parents, who tend to follow the teacher's advice. However, in the southern states of Bavaria and Baden-Württemberg, the decision is solely the responsibility of the teachers. In all cases, there is significant controversy, especially given that the separation occurs at a relatively young age and because it may involve subjective factors or biases in the decision-making process. While there are pathways for transitioning from one school to another, data shows that such migration is minimal (Deutschland, 2021).

While the states assume most of the educational responsibilities in Germany, the municipal districts provide the necessary infrastructure for education. This means that they are responsible for ensuring the availability of school buildings that meet the needs of students, as well as providing the necessary personnel for the proper functioning of schools, such as janitors, for example. However, teachers are employed by the state as public servants. Schools in Germany are required to implement the guidelines established by the state within their curricula. Furthermore, they work on school development plans, known as "*Schulentwicklungspläne*" (Deutschland, 2023b). These plans aim to develop educational services according to demand in the long term.

In Italy, the *Ministero dell'Istruzione e del Merito* (MIM) plays a central role in the governance of the educational system. It is the governmental body responsible for defining policies and carrying out tasks related to education, ranging from school education to higher education.

The MIM is responsible for establishing guidelines and regulations that direct educational practices in the country. Additionally, the ministry is tasked with promoting the quality of education, developing curricula, overseeing schools and higher education institutions, and coordinating scientific and technological research. Through the MIM, the Italian government seeks to ensure equitable access to education, promote equal opportunities, and raise standards of quality across the educational system. The ministry plays a leading role in formulating educational policies aimed at strengthening learning, supporting the development

of students' skills and competencies, and fostering innovation in the field of research (Comissione Europea, 2022).

At the primary education level, the MIM's activities mainly involve defining regulations, curricula, national guidelines, and recommendations as a framework for the curricular planning of educational institutions within the national education and training system (Genzone, 2022).

Among its key functions, the ministry is responsible for: i) the overall organization of school education, the legal status of school personnel, the training of school leaders, teaching staff, educational and administrative personnel, as well as technical and support staff; defining criteria and parameters for implementing social interventions in schools, and interventions to support disadvantaged areas for territorial rebalancing in terms of school quality and educational services; ii) research and experimentation of innovations related to education; recognition of qualifications and certifications in both the European and international spheres, and the implementation of common educational policies among European Union countries; iii) defining guidelines for the National Assessment System; iv) identifying objectives, standards, and training courses in higher education and advanced technical training, as well as managing relations with the training systems of the regions; v) defining guidelines for private schools and non-state schools and courses; vi) managing activities related to student and parent associations; vii) promoting students' rights and services for families, the promotion of student status, study, and career guidance; viii) managing international relations in bilateral and multilateral contexts, and promoting the internationalization of the education and training system (Itália, 2023b).

It is essential to highlight that the *Ministero dell'Istruzione e del Merito* (MIM) works in close collaboration with other stakeholders in the Italian educational system, such as regions, autonomous provinces, and schools, to ensure the effective implementation of academic policies across the country. The regions hold concurrent legislative powers in education, meaning that a region cannot make decisions unilaterally; the state must be involved in the decision-making process. Additionally, the regions have exclusive legislative powers in the field of education and vocational training. On the other hand, each school in Italy is autonomous. Educational institutions enjoy educational, organizational, and research autonomy, as well as autonomy in experimentation and development (Itália, 2023c).

Article 33 of the Italian Constitution establishes two fundamental principles: the obligation of the state to provide a public school system for all young people, and the right of individuals and legal entities to establish schools and educational institutions at no cost to the

state (Italia, 2023a). Thanks to this constitutional article, schools in Italy can be of different types: state schools or non-state schools (parity schools, non-parity schools, and foreign schools).

Parity schools, mostly Catholic institutions, may be private or managed by local entities. These schools are authorized to issue qualifications with the same legal value as those of corresponding state schools. They also enjoy full freedom regarding cultural orientation and pedagogical direction and benefit from more favorable tax treatment if they are non-profit (Italia, 2000).

Non-parity schools are private institutions registered in regional lists, which are updated annually. Regular attendance at these schools fulfills the educational obligation; however, they are not authorized to issue legally recognized qualifications, nor intermediate or final certificates with legal certification value. Consequently, students must take an aptitude test at the end of each school year or if they wish to transfer to a state or parity school (Itália, 2006).

There are also foreign or international schools in Italy, which follow a curriculum from their country of origin, with the language of instruction being that of the school's home country, rather than Italian. Although these schools are located in Italy, they do not belong to the Italian educational system. However, some of them are recognized due to bilateral, multilateral agreements or within the European Union, particularly through the 1997 Convention on the Recognition of Qualifications concerning Higher Education in the European Region. Foreign schools not covered by cooperation agreements are considered private non-parity schools, and the certificates issued by them are not valid within the Italian territory (Lantero; Finocchietti; Gitto, 2021).

The fact that basic education is compulsory in these three countries and free in public schools results in high enrollment rates. In primary education, state schools are responsible for enrolling more than 96% of students. However, the mandatory school age differs between countries. In Brazil, compulsory education begins at 4 years old and extends to 17 years old (Brasil, 2013). In Germany, it begins in the first year of primary education, at 6 years old, and is compulsory for 9 years (Deutschland, 2021). In Italy, it starts at 6 years old, similar to Germany, but lasts for 10 years (Itália, 2023c).

In all these educational systems, student attendance in classes is mandatory; however, the requirement for attendance does not guarantee the quality of education. In Brazil and Italy, for example, a minimum attendance rate of 75% is set, but it is essential to question whether this metric is sufficient to ensure effective learning. Moreover, the number of school days also

varies between countries, with 200 days officially stipulated in Brazil, approximately 190-210 days in Germany, and 33 weeks or 230 days in Italy. However, it is necessary to go beyond the number of days and consider the quality of pedagogical activities and student engagement during this period. Merely counting days does not necessarily reflect the effectiveness of the teaching-learning process in each country.

Furthermore, the weekly workload is an aspect that must be considered. In Brazil, the minimum workload defined by law is 800 hours annually, which amounts to 20 hours per week (Brasil, 1996). In Italy, the first five years of primary education can have a minimum weekly workload of 24, 27, or 30 hours in part-time schools, or 40 hours in full-time schools (Italia, 2009). In Germany, part-time schools vary between 20 and 29 hours per week, while full-time schools can reach up to 36 hours weekly (Parente, 2020). These variations in workload among countries, as well as internally, can partly explain performance differences. However, a critical and in-depth analysis of the various factors influencing the quality and effectiveness of the educational system is essential, taking into account attendance and the length of the school year.

The data presented demonstrate that the constitutional right to education is a fundamental aspect shared by these three countries. However, it is necessary to emphasize that the mere establishment of this right in Constitutions does not automatically guarantee the quality and effectiveness of the educational system. Although it is commendable that the objectives of primary education include students' personality development and their preparation for community participation, it is crucial to question whether these objectives are being fully achieved in practice.

The implementation of these objectives depends on various factors, such as adequate investment in educational resources, qualified and ongoing teacher training, and the structuring of curricula aligned with the needs and demands of students, among others. Unfortunately, these aspects often do not receive the attention and investment they require from governments, resulting in gaps and challenges in achieving the established educational objectives.

Moreover, education should not be limited merely to the transmission of knowledge and skills; it should also foster critical thinking, appreciation of diversity, respect for human rights, and preparation of students to face the challenges of the contemporary world. Therefore, the mere inclusion of these objectives in policy documents is insufficient. Governments, educational institutions, and society must make an effective commitment to ensure that these principles are genuinely translated into educational practices that promote students' holistic development and prepare them for active and critical participation in society.

It is essential to recognize, however, that despite the similarities and shared constitutional objectives, the effectiveness of implementing and achieving these objectives may vary among the three countries. This variance is due to factors such as resource availability, social inequalities, structural challenges present in each national context, and aspects related to each nation's historical formation. In Brazil, the continental territorial expanse, the presence of Indigenous peoples, and high-income concentration are determining factors; in Italy, historical tensions in border regions with ethnic and linguistic minorities, the integration of immigrant children and descendants, big regional cultural differences, and north-south disparities stand out. In Germany, the overcoming of the historical division between East and West Germany, cultural and organizational variations among states, intense immigration, and the rise of xenophobia and racism are aspects that also need to be considered. These factors are essential in pursuing an educational model that accommodates the diversity present in the public schools of these countries.

Funding and Challenges

Educational systems are highly complex mechanisms that require constant maintenance, investment, renewal, and must be continuously updated and ready to serve the school community. Without proper financial support, it would be nearly impossible for these systems to function effectively.

In Brazil, funding for education comes from three main sources: the federal government, state governments, and municipalities. According to Article 212 of the Brazilian Constitution, the federal government is required to allocate at least 18% of its tax revenues to education, while states and municipalities are obligated to allocate at least 25% of their tax revenues to this sector (Brasil, 2022).

These funds are responsible for financing public schools and universities, covering expenses such as staffing, materials, and food services. Public school students bear no educational expenses, as schools are open to all children in the country without additional fees.

In Germany, nearly three-quarters of all educational expenditures are borne by the states. These expenditures are primarily financed by taxes, with a small portion also supported by private donations. The German federal government contributes only a minor share (in 2017: 10.6 billion out of a total of 133.4 billion euros), which is justified by each state's cultural

sovereignty. The second-largest portion of educational spending is borne by local communities, which in 2017 contributed 28.5 billion of the total 133 billion euros (Deutschland, 2021).

Public early childhood education units are maintained by local authorities and funded by them and the states, which are responsible for personnel and material expenses. Schools may also receive contributions from students' parents. Private schools, managed by churches, parent initiatives, or other organizations, receive similar funding as public institutions, along with additional financing from the organizations that operate them. In primary education, local authorities are responsible for funding non-teaching staff and materials, while states cover the payroll for teaching staff. Other expenses, such as school transportation costs, are covered by local authorities but may be reimbursed by the states, which also contribute funds for building maintenance and other operational costs. More recently, the federal government has begun providing financial subsidies in specific areas, such as funding for the digitalization of schools.

The educational system's funding is fully provided by the government, primarily through taxes, and is partly supplemented by private donations. Children, youth, and adults in need have a legal right to access educational benefits and to participate in the education support package. This package covers additional expenses such as school meals, supplemental learning support (e.g., tutoring), and an annual allowance of 150 euros (distributed in two installments) to meet personal school-related needs, such as backpacks, writing materials, calculators, and drawing supplies. Additionally, the package covers expenses for school trips, which may last one or more days, and school transportation costs (Deutschland, 2021).

In Italy, compulsory education is free and provided by the State. The necessary funding to ensure the effective and comprehensive functioning of the educational system comes from taxpayer resources. In addition to public educational institutions, the State is committed to making education accessible to all citizens. This commitment is evident in policies and measures aimed at promoting inclusivity and equal educational opportunities (Itália, 1994, 2013).

Through public funding, the Italian government strives to ensure that all children and young people have access to quality education, regardless of their socioeconomic background. This investment in the educational system is essential for promoting equity and social justice. It is important to highlight that public funding is not limited solely to public educational institutions but can also extend to private schools that meet specific criteria and requirements set by the State. In this way, Italy demonstrates its commitment to providing free and accessible

education to all citizens through a public funding system designed to guarantee quality and equal educational opportunities nationwide (Itália, 1994, 2013).

For students attending primary schools, textbooks are provided free of charge and paid for by the municipalities. For students in secondary schools, textbooks are paid for by families themselves. However, by presenting an income declaration certificate, low-income families may obtain textbooks for free or at a reduced cost (proportional to their income). Lunch services are optional for all schools. If students make use of this service, parents or guardians are required to pay for it. Similarly, families may submit an income declaration document to either avoid these costs or pay only a portion (Itália, 1994, 2013).

As autonomous entities, schools have the opportunity to seek or receive funding from various sources. Article 2 of Decree No. 129/2018 establishes that school units may apply for resources from the European Union, the Italian State, regions, local or public entities, as well as from private entities and individuals. Additionally, schools can generate revenue through voluntary contributions from families, which must be used exclusively for educational purposes (Itália, 2018). Schools have access to funds such as the European Social Fund (ESF) or the European Regional Development Fund (ERDF) for the implementation of projects in social or infrastructure areas. They may also benefit from the National Digital School Plan (PNSD), which is aimed at innovating teaching methods and school practices. Furthermore, schools may accept donations, take out loans, receive sponsorships, and generate income from intellectual property works and industrial property rights, among other sources.

Differences in the regulation of educational funding across the countries analyzed contribute to understanding certain disparities. In Brazil, funding covers not only school personnel and infrastructure but also instructional materials and meals. Financial resources are sourced from the federal, State, and municipal governments. When a school is public, it is entirely free, and students are not required to pay any additional fees for the educational services they receive. In Germany and Italy, funding similarly comes from governmental sources, but the State does not fully provide school supplies. In Germany, the state government is responsible for distributing textbooks used in schools, and students in vulnerable situations may apply for financial support to obtain additional materials. In Italy, students must purchase their supplies, but those in need may request financial assistance from the government.

On the other hand, teacher hiring in Germany and Italy is conducted centrally for all schools within these countries, with equal salaries regardless of the state or city in which teachers work. In Brazil, each school network selects and hires its teachers, leading to

disparities and, at times, teacher migration from one network to another in search of better salaries and working conditions. This situation can disrupt services and harm the school community due to high teacher turnover.

Final considerations

This study aimed to understand, through a comparative analysis, how the education systems in Germany, Brazil, and Italy are structured, particularly regarding curriculum and hierarchical organization, as well as basic education funding. By examining the systems, official documents revealed differences and similarities that help clarify how each country's decisions impact specific aspects of education.

The results indicate that Brazil, Germany, and Italy share some commonalities but also exhibit significant differences in key aspects. One of these aspects is the hierarchical organization of educational systems. In Brazil and Italy, the educational system is centralized, whereas in Germany, states are responsible for curricula, and local authorities oversee school infrastructure and other services. The three countries share free and compulsory education, resulting in high enrollment rates. However, the length of compulsory schooling, the organization of grades, and the age range for mandatory attendance vary among them.

Beyond structural and financial factors, other aspects need to be considered to understand the success or failure of certain educational experiences. It is essential to remember that public schools are responsible for serving a heterogeneous and complex community, composed of students and families facing unique and social challenges across these three countries. Education is a complex topic, and although there are successful initiatives, examining the crises in these systems can contribute to overcoming difficulties and building a school better prepared for contemporary challenges.

Therefore, it is essential to critically analyze these shared aspects and identify the specific nuances and challenges these countries face to fully understand the characteristics and impact of the educational systems in Brazil, Germany, and Italy. The findings provide a basis for further studies aimed at investigating more specific aspects of education in these countries.

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