



## Executive summary

### Overview of the study

This is the final report for the study to evaluate the impact of EU educational reforms (notably the Bologna Process and the European Qualifications Framework) on the recognition of professional qualifications under Directive 2005/36/EC. The main research elements of the study were as follows:

- Desk research and initial scoping interviews with 22 stakeholders, primarily at European level.
- Interviews with education ministries and key individuals involved with education reform at national level. This involved a telephone survey of 44 interviews across 21 Member States.
- An online survey of competent authorities for a sample of 17 professions in all Member States to provide a baseline picture of the impact of education reform on the recognition of qualifications. A total of 129 valid responses were received.
- Case studies to explore in more detail the situation for eight professions in 17 countries. A total of 190 interviews were undertaken with competent authorities, responsible ministries, professional bodies and training bodies related to the sample professions at national level. The professions featured in the case studies were:
  - 1. Doctors (under the Automatic recognition system); 2. Accountants; 3. Civil engineers; 4. Physiotherapists; 5. Real estate agents; 6. Pharmaceutical technicians; 7. Biomedical/medical lab. Technicians; 8. Social workers (all under the General System).
- Research on labour market trends to identify future priority professions for easier qualification recognition. This included analysis of over 200 key research sources at European and national level, including employment forecasts, sector analysis of labour demand and supply and research on labour market mobility. Desk research was complemented by interviews with 37 labour market experts in 21 Member States.

### Professional recognition under the General system of Directive 2005/36/EC

#### Convergence under the Bologna process and the impact on professional recognition

The Bologna process has had a significant impact on higher education systems across Europe – but this impact has been uneven with regard to professional recognition. Its overall impact to date on the recognition of professional qualifications relates to improved comparability of qualifications. This was reported by a third of competent authorities. Yet there has been little substantive impact as a result on the time it takes to recognise qualifications. Four out five competent authorities reported that the time required for the recognition procedure has remained constant over the last 2 or 3 years.

#### *Impact of the Bologna degree cycle structure on professional recognition*

The Bologna cycles support transparency by exposing fundamental differences in the structure and level of training. However, only 20% of competent authorities think that the Bologna cycles have made the recognition process quicker or easier.

#### *Impact of ECTS on professional recognition*

The European Credit Transfer and Accumulation System (ECTS) has greater potential to support improved recognition of qualifications. From a competent authority perspective, the more detailed information contained in the Diploma Supplement and ECTS transcripts more practically supports the recognition procedure by providing a consistent and comparable overview of subject content. However, the use of ECTS in applications for recognition remains relatively uncommon.

The approach to introducing credit systems, with significant autonomy for higher education institutions, has led to difficulties in developing a uniform approach at national level. Significant differences remain across countries (and within countries) in the approach to credit allocation. These differences relate to whether the calculation is based on workload as opposed to just teaching / contact hours, and whether

credit is linked to learning outcomes. Slight variation in credit values between countries is much less of a concern for competent authorities than consistency in the definition of credit itself (*i.e. what is included*). Around half of interviewees for the case studies were satisfied with the notion of ECTS being allocated according to the student workload (and not only according to teaching hours), but a core of competent authorities remain uncomfortable with this approach

### *Impact of learning outcomes on professional recognition*

At present, competent authorities have relatively little experience in using learning outcomes as part of the recognition process. Learning outcomes are the least well-known element of the Bologna reforms among recognition professionals. Very few competent authorities (13%) among those interviewed for the case studies believed that the introduction of learning outcomes has made the recognition of professional qualifications easier or quicker. This is explained not only by the rareness of its inclusion in applications, but also by the tendency for learning outcomes to be presented in generalised terms (*i.e.* they can lack sufficient detail to support the recognition decision) and a perceived disjuncture with the current input-based Directive 2005/36/EC requirements. However, there is an expectation that this will change over time given the ongoing development and implementation of national qualifications frameworks and the learning outcomes approach in general.

### *Future impact of the Bologna reforms on professional recognition*

The main barrier to the Bologna process supporting recognition relates to a lack of full and consistent implementation of the reforms. While the Bologna process aids student mobility, the reforms are complex and not yet fully embedded to the point of having a significant impact on professional recognition. There is also the prospect that the Bologna reforms lead to the development of new, more flexible approaches to higher-level learning (within the context of lifelong learning). This may pose additional challenges in the future to competent authorities which are used in most cases to applying recognition on the basis of traditional models of initial professional training as the culmination of an individual's formal education at a young age.

In terms of the role the Internal Market and its policies might play in supporting the Bologna process to impact on professional recognition, there were a number of references to supporting common platforms (or something similar) as a means of harnessing the common approaches to qualifications supported by the Bologna reforms. The introduction of learning outcomes perhaps provides a new basis for such joint action.

### *Professions which would benefit from easier recognition*

There are six sectors in Europe that employed more than 15 million workers in 2009: manufacturing; wholesale and retail trade; human health and social work activities; construction; public administration and defence; and education. Manufacturing has declined significantly in employment terms in recent years; while the public administration and defence and the wholesale and retail sectors have declined in terms of the proportion of employment they represent, but not in absolute terms. Construction, education and health and social care have remained fairly constant in the proportion of European employment they represent, with growth slightly above the European average. Overall, on the basis of current trends, these six sectors will still employ the highest proportion of workers in 2020.

There is a significant concentration of regulated professions within three of these sectors: health and social care, education and construction (e.g. construction engineering). Crucially, this includes regulated professions with a significant number of applications for professional recognition. These sectors, especially in the context of healthcare professions, are where action to support easier or even automatic recognition links most closely to likely future demand. They could provide a focal point for support to establish any new approach to common platforms proposed by the European Commission.

European level research predicts that the number of jobs in Europe is expected to grow up until 2020, with the creation of up to 20.3 million jobs<sup>1</sup>. When looking at the skills needs of all predicted new jobs in 2020 (growth and replacement), around 39% of these jobs will require higher-level qualifications. The higher-level skills required will not be sector specific. It is also expected that the trend of “broadening skills” in the service sector will continue. This implies significant changes to the labour market that could impact on the mobility of professionals and on the recognition of professional qualifications.

The sectors where we would expect to see the highest levels of mobility are those experiencing labour shortages and/or growth. There is, though, a complex relationship in practice between demand for labour and labour mobility. For example, the health sector has seen a large influx of non-national workers in a number of countries. However, this has declined in recent years as Member States have been increasing the number of health professionals they train. Shortages are still reported in some countries and for some professions and future shortages are anticipated for key professions, such as doctors, when the current cohort retires. There is also increased demand expected for managers, doctors, health associate professionals (opticians, radiographers), nursing and midwifery professions and social workers. The key determinant of future demand for professionals in the education sector is replacement demand.

### Other methods to achieve convergence

#### *Convergence through EU educational reform*

The reform of degree structures under the Bologna process supports improved transparency between different national higher education systems, but not similarity (or convergence) in curriculum. Convergence in training content (i.e. the learning outcomes aimed at or the topics taught) is only likely as, at best, an indirect consequence of the Bologna process – as a result of improved transparency and understanding of difference which may encourage action to align content.

There is little evidence so far that convergence in training contents is on the horizon in the Bologna process, and it has never been the aim of the process. The evidence so far of the impact of the Bologna process strongly suggests that where convergence happens, it is bottom-up process led by individual universities working to common frameworks for subjects/professions. However, the view on this activity from education ministry interviews was that approaches such as the Tuning Project, while important, have not generally had a wider impact in terms of convergence in training content.

#### *Prospects for future convergence*

The majority of competent authorities (64%) responding to the online survey agreed that automatic recognition could be achieved if there were common minimum requirements in terms of qualification content. The overall position varies considerably by profession. Healthcare-related professions more strongly believe that automatic recognition could be achieved through minimum content requirements.

There is also no consensus among competent authorities on how these minimum requirements should be set (e.g. taught subjects; broadly formulated knowledge, skills and competences; detailed definitions of knowledge, skills and competences). It was also felt to be a significant challenge for most professions to set agreed and workable minimum requirements and could require a fairly elaborate process.

#### *Convergence based on training contents or agreed definitions of learning outcomes*

Competent authorities were split on the question of whether convergence of training contents or agreed definitions of learning outcomes would better facilitate the recognition of professional qualifications. Some competent authorities did not feel in a position to be able to judge, but of those that could:

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<sup>1</sup> Estimated in the period from 2006 to 2020 and across the EU25, although forecasts have been affected by the subsequent economic downturn and more recent forecast scenarios estimate around 7 million new jobs from 2010 to 2020 across the EU27.

- 60% thought that agreed definitions of learning outcomes (supported by transparent quality assurance arrangements) better-facilitated recognition
- 40% thought that the convergence of training contents (supported by transparent quality assurance arrangements) better-facilitated recognition.

In practice, interviewees said that either approach could facilitate recognition. Preferences were therefore fairly marginal in nature and depended on the ethos of the competent authority.

#### *The role of quality assurance in supporting the potential use of agreed learning outcomes*

For many stakeholders, the development of common or minimum approaches to quality assurance and accreditation underpin the potential use of learning outcomes in a professional recognition context. Yet only half of competent authorities thought that the fact that institution awarding the qualification is quality assured at national level is a 'very important' dimension in deciding on the recognition of foreign qualifications (where the profession is not regulated in the country where the qualification was awarded).

The more practical consideration for competent authorities using outcomes-based approaches was quality assurance at the level of the qualification – and specifically in the context of assessment methodologies. Through the case studies, lack of understanding of and confidence in the assessment of achieved learning outcomes was the most commonly voiced reason why an outcomes-based approach is not currently practicable. What is required is that approaches to quality assurance are aligned between countries, and also that their benefits for and impact on qualifications are better-communicated.

#### *Sectoral approaches to achieving convergence*

There are a number of examples of sectoral approaches at EU level to support professional mobility. The significant point about much of this work is that it harnesses the Bologna reforms and EQF developments to provide the basis for a common sectoral approach. This includes setting either a common framework for knowledge, skills and competence or common minimum standards for training. Sector approaches also use labels/accreditation for individuals or programmes as a direct way of supporting professional recognition. They may be led primarily by professional bodies or education institutions.

There is a significant challenge in moving these approaches from the development to the implementation phase. National-level stakeholders interviewed through the case studies put far greater store on 'organic' approaches to achieving convergence (educational exchange etc) rather than top down common European/international frameworks or standards (civil engineering and, to a lesser extent, biomedical/medical technician stakeholders were a possible exception here).

## Professional recognition for doctors already benefitting from automatic recognition

### *The three-cycle structure and doctors*

In order for the three cycle structure to provide advantages to doctors seeking professional recognition, it is important that it is widely-established at Member State level. Yet Medicine is arguably the subject area in which the Bologna cycles have the least traction in practice. Medicine is excluded from the Bologna degree cycle structure in 16 out of 27 countries, including many of the largest Member States.

In those countries that have not incorporated the Bologna cycles within medical education, education ministries, competent authorities and medical professional bodies generally expect this position to remain in the medium-term. Much of the rationale for not introducing degree cycles relates to the length of study and the integrated cycle providing the only meaningful labour market entry point. .

### Calculating the duration of training for doctors

There is a relatively high degree of awareness of ECTS among doctors' stakeholders. The extent of familiarity with the system is more mixed, although nearly two-thirds of stakeholders (63%) described themselves as being at least 'quite familiar' with it. Many interviewees were much less comfortable in drilling down into specific elements of credit systems (e.g. credit allocation).

Around half of doctors' stakeholders interviewed during the case studies saw potential added value in automatic recognition based on ECTS credits rather than using teaching hours. Many of these interviewees supported the approach in principle, because they felt that the current focus on teaching hours is a limited measure – in that it says nothing about the competence of doctors. The interpretation of ECTS in this context was therefore based on having ECTS linked to learning outcomes, which is not yet always the case.

A number of respondents were sceptical about how easy it would be to build consensus on the definition of minimum standards (or training requirements) in the context of ECTS.

Although there is not widespread support for using ECTS as an *alternative* measure to duration (years / hours) in the context of automatic recognition, there is support for its inclusion as an *additional* element. Two-thirds of doctors' authorities responding to the online survey agree or strongly agree that ECTS would strengthen the existing system. There is therefore a case for considering the use of ECTS to structure the content of minimum training requirements for doctors in the future

### Methods to better-guarantee automatic recognition for doctors

Competent authorities for doctors are relatively evenly split between preferring to maintain the current system and including new/additional criteria. Those preferring the current system are often adopting a pragmatic response. There are different improvements that many doctors' stakeholders could suggest, but a prevailing view among this group was that the system is functional and, more importantly, that to attempt to introduce new or additional criteria could put the basis for automatic recognition at risk. While there was a split over the perceived need to introduce new or additional criteria, it was generally felt that explicitly mentioning a minimum list of competences (based on learning outcomes) would strengthen the existing system.

A slight majority of case study interviewees relating to the doctors' profession (58%) thought that the current system of recognition based on harmonised minimum training content provided greater confidence than a system based on learning outcomes without taking duration into account.

In contrast, 30% of respondents thought that learning outcomes inspire more confidence – given that this approach is without taking duration into account. It is important to note, though, that no interviewees suggested that the recognition of doctors' qualifications should ideally take place without reference to duration. Many thought that setting harmonised content/duration against learning outcomes with no reference to duration was '*a false opposition*'.

In practice, interviewees took a more nuanced view; and many of those suggesting that a learning outcomes-based approach provided more confidence believed that the achievement of learning outcomes had to inevitably make reference to the volume of learning (e.g. through ECTS).

Interviewees who were more confident in the current system of harmonised minimum content and duration predominantly echoed the widely-held view that a measure of duration is crucial to the recognition process. Other factors were influential as well:

- There is not yet sufficient experience of the use of learning outcomes to provide a definitive view on how workable the approach is.
- Underlying scepticism that medical training across Europe was sufficiently reformed in terms of being based on learning outcomes to make this a realistic basis for minimum training requirements.

- The suggested difficulty in developing common outcomes measures for doctors that are sufficiently detailed to be useful and yet commonly agreed across Member States.
- Fears that it would dilute the theoretical underpinning of medical degrees.

Competent authorities and professional bodies for the medical profession were not particularly confident in putting forward opinions regarding whether learning outcomes, if incorporated within the recognition process, should be detailed or broadly defined. Where they could put forward a position, there was a strong preference for detailed learning outcomes.

One of the issues that medical stakeholders returned to time and again in the case study interviews was the perceived impracticality of agreeing a framework of competences and learning outcomes that could form the basis of a system of automatic recognition for doctors.

## Levels of qualifications for the application of the general system

### *Use of the five-level system under Article 11 of the Directive*

While levels are used variably, the system of levels is deemed to be an important part of the recognition process. Three quarters of competent authorities felt that it is useful to maintain a system of levels within the Directive. For some, it is *'an important reference point'* for comparing qualifications. This may be as simple as providing a kind of *'terms of engagement'* with the home country competent authority to request information.

A significant minority of competent authorities (38%) do not use the five levels contained within Article 11 to exclude qualifications from the recognition process. Some competent authorities simply prefer to examine each application in detail. In this regard, it must be noted that it is relatively rare according to competent authorities for applicants to attest more than one level out under Article 11. While over a third of respondents to the online survey (39%) reported that they had experienced this situation, the case study interviews suggest that it is an infrequent occurrence.

Furthermore, most competent authorities do not experience problems resulting from the profession being regulated at different Article 11 levels in different countries. This was identified as frequent difficulty by just over 1 in 5 competent authorities. It is clear that qualification level is more likely to lead to difficulties for those professions regulated at level d. under Article 11, where the level beneath can involve a large difference in duration of study.

In spite of this, it is clear that the assessment of levels under Article 11 serves an important purpose. It means that applicants are, in practice, generally not refused recognition on the basis of level (according to Article 11). In this sense, the requirement to recognise a qualification at the level below that required in the host country is crucial for ensuring that the basis for decisions is substantial differences in content rather than type of qualification (e.g. refusing to recognise an applicant on the basis that he or she has a bachelor degree where a master is required). This provides for a consistency of assessment, irrespective of the educational structure of the applicant's home country.

Article 11 also provides a starting point for competent authorities to gauge whether or not they would expect to see differences in content as a consequence of differences in duration. The level of the qualification does not provide the evidence that such differences exist, but it helps competent authorities to understand and interpret potential differences in content. As noted above, it also means that qualification level in itself does not become the basis for making the recognition decision (except in extreme cases where the applicant's qualification is at a much lower level than that required in the host country).

### *The use of the eight-level EQF*

For the eight-level EQF system to be viable in the context of Directive 2005/36/EC, it assumes that NQFs linked to the EQF have been established in all Member States. This is an ongoing process in the majority of Member States. This suggests that it is too early to predict with any confidence what the impact of the eight-level system might be in practice on the recognition of professional

qualifications. It is important to note that much of the current focus at national level is on ensuring frameworks are fully developed and the relationship of NQFs with the EQF is transparently presented at European level.

Given the state of progress in implementing the EQF, very few competent authorities (11%) interviewed for the case studies had dealt with applications for the recognition of professional qualifications where the EQF (or indeed an NQF level) was clearly stated. From the limited experience to date, competent authorities found that the EQF level in applications was generally the same in the 'foreign' qualification as required in the host country.

When asked directly about whether a system of levels defined in terms of inputs (as in Article 11, based on the level and duration of studies and level and type of institution where the studies take place) or a system based on levels defined in terms of knowledge, skills and competence (as with the EQF) would better facilitate recognition, there was a slight preference among competent authorities for the EQF, although competent authorities overall were quite split on this question.

The majority of respondents (68%) also said that they would not agree to recognise a foreign qualification for the same profession automatically (without any compensatory measures) if the EQF level of the qualification is the same as the EQF level of the national qualification. Many of those who said that they would recognise on the basis of EQF level, explicitly qualified this to say that it assumes a degree of convergence in subject area/curriculum.

Reasons given for not recognising automatically included:

- Insufficient information is provided by EQF qualification level.
- EQF level is not a sufficiently-detailed measure of competence applied in a professional context.
- EQF level could be used for automatic recognition (without compensatory measures) but other conditions must also be in place.
- EQF level cannot address or by-pass significant national requirements.

At the same time, as described above, competent authorities do not use Article 11 levels to recognise or reject applicants either.

There is an apparent fundamental disagreement about whether the use of outcomes-based levels makes the comparison of equivalence of qualifications easier (more relevant) or more difficult. The problem is that, in practical terms, there is simply not sufficient evidence to state which perspective is the more accurate view. In the short- to-medium term it is likely that both opinions could be arguable depending on the specific professional context and the varying importance of 'level' as a defining consideration for recognition purposes. Ultimately, there was much more consensus on the view that input and outcome measures should be combined within the recognition process. This is a logical response given that the information is complementary. However, it is questionable whether this actually facilitates the free movement of professionals or creates additional barriers for applicants.

### *A system without levels*

There could be an argument for removing the system of levels from Directive 2005/36/EC if there is sufficient consistency in the level at which professions are regulated for it not to be a significant issue for the recognition process. When asked whether a five, eight or no level system would better facilitate recognition, very few respondents to the online survey (7%) thought that a system without any defined levels would be preferable. The lack of appetite for having a system without any defined levels is unsurprising given that competent authorities generally appear to express preferences for more rather than less information.

When exploring with interviewees what was valuable in the information provided about level, it became apparent that its purpose – for a significant body of competent authorities – was to provide basic confidence that they were *'comparing like with like'*. Level is a proxy for academic challenge, even though duration and content is more important. While a measure of qualification level is not the only way to look at equivalence, it is the way that most competent authorities are familiar with. Some interviewees argued that well-designed learning outcomes can do the same thing – and can indirectly



define level in a more useful way. However, overall familiarity with learning outcomes is not high enough among competent authorities for this approach – more sophisticated though it may be – to provide that same basic confidence. It could also be argued that if the system of levels was removed from the Directive, competent authorities may attempt to base decisions not to recognise on the basis of level and type of qualification in a way that they do not (explicitly) under the current system.

It is clear from the study that competent authorities consider the information about qualification level as an important element, even though they do not base their decisions about qualification level. It is therefore unlikely that even if the structure of levels (Article 11), as such, was removed from the Directive, that competent authorities would stop using information about level to compare qualifications. The Bologna framework cycles have become part of ‘common language’ about qualifications and this information would continue being used. As the EQF develops it is also likely to become such common reference

#### *Dealing with older qualifications under the EQF*

As it currently stands, there is a lack of concrete evidence that older qualifications will be mapped to NQFs linked to the EQF. The current focus of national authorities is on qualification reform and development work. There is discussion in the countries developing NQFs about the position of old qualifications. In practice, it appears possible to use a ‘best fit’ model to apply level to older qualifications. It is recognised that doing so may mean that eligibility and progression provisions do not necessarily apply to the older qualification. However, the presumption that provisions should be extended to holders of former qualifications is the important element – and this is already seen in the specifications for some NQFs.