



Co-funded by the  
Erasmus+ Programme  
of the European Union



# Conceptual Analysis of Automatic Recognition of Foreign Higher Education Qualifications and Learning Period

*v.1. January 8, 2021*



## Contents

1. ABBREVIATIONS.....	3
2. KEY CONCEPTS.....	4
3. INTRODUCTION TO THE DOCUMENT.....	6
4. INTRODUCTION TO THE CONCEPT.....	7
4.1. The Concept of Automatic Recognition.....	7
5. REPORT OF CONCEPTUAL BACKGROUND AND EU RELATED DOCUMENTS AND TOOLS.....	10
5.1. EU Strategy.....	10
5.2. International Recommendations.....	12
5.3. EU Transparency Tools and Mutual Trust.....	13
5.4. Key Elements of Qualifications in Recognition Practice.....	16
6. RECOGNITION POLICES, PRACTICES AND STRATEGIC PLANNING IN EU AND PARTNER COUNTRIES	18
6.1. Current Models on Automatic Recognition in Use in EU.....	18
6.1. Croatia.....	18
6.2. France.....	22
6.2.1. Academic recognition.....	22
6.2.2. Professional recognition.....	23
6.2.3. Professional experience recognition.....	24
6.3. Germany.....	28
6.4. Malta.....	30
6.4.1. Academic recognition.....	30
6.4.2. Professional recognition.....	32
6.4.3. Status of automatic recognition.....	33
6.5. Poland.....	34
6.6. Spain.....	37
6.7. An Example of Practices in EU.....	39
6.7.1. Nordic Region.....	39
6.7.2. Norway example - NOKUT.....	40
7. SEA-EU PROJECT ACTIVITIES INVOLVING AUTOMATIC RECOGNITION PROCESS.....	41

## 1. ABBREVIATIONS

CAU	Christian-Albrechts-Universität zu Kiel
EHEA	European Higher Education Area
ESG	Standards and Guidelines for Quality Assurance in the European Higher Education Area
EQF	European Qualifications Framework for lifelong learning
FHEQ	Foreign Higher Education Qualification
QA	Quality Assurance
QF-EHEA	Qualifications Framework of the European Higher Education Areas
SEA-EU	The European University of the Seas
UBO	Université de Bretagne Occidentale
UCA	Universidad de Cadiz
UM	L-Università ta' Malta
UNIST	Sveučilište u Splitu
UG	Uniwersytet Gdanski

## 2. KEY CONCEPTS

- **Recognition** – formal acknowledgement of (i) individual academic or professional qualifications; (ii) programmes of a higher education institution; and/or (iii) quality assurance agencies, by a competent recognition authority that acknowledges certain standards and/or values with respect to special purposes that indicate the consequences of recognition. Recognition is usually of a cross-institutional and/or cross-border nature. As regards recognition of individual qualifications, learning experiences (e.g., degrees, diplomas, or periods of study) are validated with a view to facilitating the access of holders to educational and/or employment activities. Here, at least two kinds of recognition, those for academic and those for professional purposes, should be distinguished. Recognition can also be sought in the context of recognition of a certification from one certifier to another.
- **Academic recognition** – approval of courses, qualifications, or diplomas from one (domestic or foreign) higher education institution by another for the purpose of student admission to further studies. Academic recognition can also be sought for an academic career at a second institution and in some cases for access to other employment activities on the labour market (academic recognition for professional purposes). As regards the European Higher Education Area, three main levels of recognition can be considered, as well as the instruments attached to them (as suggested by the Lisbon Convention and the Bologna Declaration): (i) recognition of qualifications, including prior learning and professional experience, allowing entry or re-entry into higher education; (ii) recognition of short study periods in relation to student mobility, having as the main instrument the ECTS (European Credit Transfer and Accumulation System); (iii) recognition of full degrees, having as the main instrument the Diploma Supplement.
- **Professional recognition**<sup>1</sup> – recognition of a foreign higher education qualification for the purpose of employment. Refers to the right to practice and the professional status accorded to a holder of a qualification. Owing to different regulations for the recognition of degrees or titles, a differentiation of two groups should be made: de Jure Professional Recognition applies to the right to work in a specific country in a legally regulated profession (e.g., as a medical doctor) while de Facto Professional Recognition refers to situations of unregulated professional recognition, such as situations in which no national legal authorization exists or is required.<sup>2</sup>

---

<sup>1</sup> <https://www.azvo.hr/en/component/seoglossary/6-quality-assurance-and-accreditation-glossary-basic-terms-and/241-academic-recognition>

<sup>2</sup> At present, the EU-UK relations are regulated through the Withdrawal Agreement as agreed in 2019 with the ensuing transition period lasting till the 31<sup>st</sup> December 2020. It must be pointed out that until the 31<sup>st</sup> December 2020 the rights and obligations including the automatic recognition of Professional Qualifications as contained in Annex V stemming from the

- **ENIC-NARIC offices** – ENIC network (European Network of National Information Centres on academic recognition and mobility) was founded by the Council of Europe and UNESCO with the purpose of academic mobility and quality application of principles of the Convention on Recognition of Higher Education Qualifications in Europe (so called Lisbon Convention). The network consists of information centres of the member states of European Cultural Convention or UNESCO Europe Region, with government bodies as their founders. NARIC network (National Academic Recognition Information Centres) was founded on the initiative of European Commission with the purpose of improving the academic recognition of qualifications in member states of European Union, European Economic Community (European Economic Area, EEA) and joint members of Central and Eastern Europe and Cyprus. The aim of the Network is to encourage academic mobility.<sup>3</sup>

---

Professional Qualifications Directive (PQD) apply for both parties. At present, the recognition of UK professional qualifications for UK and EU nationals delivered prior to the 31<sup>st</sup> December 2020 will retain their validity after the end of the Transition Period. Otherwise, in the eventuality that the UK leaves the EU without an agreement the PQD in its entirety will immediately cease to apply for both sides. All UK nationals and UK qualifications will be treated as Third Country Qualifications/nationals. An eventual agreement prior to the 31<sup>st</sup> December 2020 between both parties will alter the situation accordingly.

<sup>3</sup> <https://www.azvo.hr/en/enic-naric-office>

### 3. INTRODUCTION TO THE DOCUMENT

This conceptual analysis presents relevant elements for the automatic recognition of foreign higher education qualifications (FHEQ) and learning period abroad. It is developed within the scope of the Work Package 2 (WP2) of the Project according to the project description and all applicable rules and guidelines (WP2, [Increasing the level of mutual knowledge and integrating between the SEA-EU universities](#), Task 2.2. Working for development of joint educational policies and procedures: recognition of qualifications).

The analysis aims to ensure understanding of the concept of recognition of foreign higher education qualifications and those specifically related to automatic recognition, national legislation and differences among countries, the benefits, needs and interests. The analysis will be used to:

- a) Develop the Model for automatic recognition of foreign higher education qualifications (FHEQ) and period of learning;
- b) Test the Model for automatic recognition;
- c) Develop the Users' guidelines for automatic recognition of FHEQ and period of learning;
- d) Implement the system for automatic recognition of qualifications acquired throughout universities.

## 4. INTRODUCTION TO THE CONCEPT

### 4.1. The Concept of Automatic Recognition

**Recognition** (of foreign higher education qualification), by UNESCO, is defined as – a formal acknowledgement by a competent authority of the value of a foreign education qualification or of partial studies or prior learning.

There are three types of recognition:

- **Academic recognition,**
- **Professional recognition,**
- **Professional experience recognition.**

**Academic recognition**, according to the European Area of Recognition (EAR) Manual<sup>4</sup>, focuses on recognition of periods of study or qualifications from higher education institutions. This is the case for persons who wish – to continue (or to begin) studying or to use an academic title. It can also be considered as an approval of courses, qualifications, or diplomas from one (domestic or foreign) higher education institution by another for the purpose of student admission to further studies. Academic recognition can also be sought for an academic career at a second institution and in some cases for access to other employment activities on the labour market (academic recognition for professional purposes). As regards the European Higher Education Area, three main levels of recognition can be considered, as well as the instruments attached to them (as suggested by the Lisbon Convention and the Bologna Declaration): (i) recognition of qualifications, including prior learning and professional experience, allowing entry or re-entry into higher education; (ii) recognition of short study periods in relation to student mobility, having as the main instrument the ECTS (European Credit Transfer and Accumulation System); (iii) recognition of full degrees, having as the main instrument the Diploma Supplement.

**Professional recognition** is an official authorisation to practice a particular profession, usually for professions that are regulated by law or other professional or regulatory controls. The professional recognition deals with the assessment of knowledge and skills of a specific person. The EU Directive 2005/36/EC and 2013/55/EC established the right for the list of professionals in the EU to practice their occupations or provide services throughout the European Economic Area, of course, defining a set of requirements to national study

---

<sup>4</sup> EAR Manual: <http://www.eurorecognition.eu/emanual/default.aspx>

programmes (structure of programmes, competencies and learning outcomes, structure of academic staff, etc.).

The original definition of the EHEA Pathfinder Group on **Automatic Recognition** is still in use at the EHEA and EU levels<sup>5</sup>:

*"Automatic recognition of a degree leads to the automatic right of an applicant holding a qualification of a certain level to be considered for entry to the labour market or a programme of further study in the next level in any other EHEA-country (access)."*

This definition is used in the recent recommendation made by European ministers of Education (2018) for the creation of the European Education Area.

One key aspect of automatic recognition is therefore the automatic right to be considered for access, from one educational level to the next (this is relevant for academic recognition purposes).

Automatic recognition is a system-level based recognition ("*bachelor is a bachelor*", "*master is a master*") of quality assured comparable degrees, for both – the purpose of continuing education (academic recognition) and for access to the labour market (non-regulated professions) (professional recognition), and without intervention of a credential evaluator.

Based on several important quality assurance principles, the automatic recognition accepts – the level, quality and workload of a qualification (3 of the 5 key elements in recognition: level, learning outcomes, quality, workload and profile<sup>6</sup>). The foreign qualification is recognised on the same level and gives the same academic rights (access to further studies) and employment rights (access to the labour market) in the country where recognition is sought, as in the 'home' country. The evaluation of the other 2 key elements of a qualification (profile and learning outcomes) is considered evaluation at programme level, and still requires a credential evaluation (as it could require for national qualifications, as well).

---

<sup>5</sup> Nuffic (2020): Guidelines for the application of de facto automatic recognition: The Triangle of Automatic Recognition: <https://www.nuffic.nl/en/publications/triangle-automatic-recognition/>

<sup>6</sup> Council of Europe, UNESCO, Subsidiary text to the Convention: "Recommendation on the use of qualifications frameworks in the recognition of foreign qualifications", 2012, [https://www.enic-naric.net/fileusers/LRC\\_Subsidiary\\_Text\\_on\\_the\\_Use\\_of\\_QFs\\_ENGLISH.pdf](https://www.enic-naric.net/fileusers/LRC_Subsidiary_Text_on_the_Use_of_QFs_ENGLISH.pdf)



It is important to note that automatic recognition of foreign higher education qualifications does not mean foreign students are automatically admitted to higher education institutions.

**Professional experience recognition** is a recognition based on professional experience where professionals working in the craft, commerce or industry sectors may qualify for the automatic recognition of professional qualification in another EU country. There are two ways of getting a qualification recognised:

- automatic recognition – applies for qualifications on the basis of professional experience. The required minimum duration and nature of the professional experience are laid down in Directive 2005/36/EC on the recognition of professional qualifications, Articles 17, 19.
- mutual recognition – applies for qualifications on the basis of the general system.

If the authorities of the host country find significant differences between the training acquired in the country of origin (including individual's professional experience) and that required for the same work in the host country, they may ask the individual to complete a traineeship or aptitude test<sup>7</sup>.

---

<sup>7</sup> [https://ec.europa.eu/growth/single-market/services/free-movement-professionals/qualifications-recognition/experience\\_hr](https://ec.europa.eu/growth/single-market/services/free-movement-professionals/qualifications-recognition/experience_hr)

## 5. REPORT OF CONCEPTUAL BACKGROUND AND EU RELATED DOCUMENTS AND TOOLS

### 5.1. EU Strategy

*“A continent where spending time in another Member State – to study, to learn or to work – has become the standard and where, in addition to one's mother tongue, speaking two other languages has become the norm. A continent in which people have a strong sense of their identity as Europeans, of Europe's cultural heritage and its diversity.”*

This is the sentence through, which can higher education vision be presented. At the Gothenburg Summit on Social Affairs where European leaders met on 17 November 2017, the European Commission presented its vision of a European education area for 2025, in which the free movement of students is guaranteed. Education and Culture are there presents as a key to building inclusive and cohesive societies, and to sustaining competitiveness. The main goals of the Communication on Building a stronger Europe: the role of youth, education and culture policies<sup>8</sup> were presented through the following decisions:

- stepping up mobility and exchanges, including through a substantially strengthened, inclusive and extended Erasmus+ programme;
- strengthening strategic partnerships across the EU between higher education institutions and encouraging the emergence by 2024 of some twenty 'European Universities',
- consisting in bottom-up networks of universities across the EU which will enable students to obtain a degree by combining studies in several EU countries and contribute to the international competitiveness of European universities;
- enhancing the learning of languages, so that more young people will speak at least two European languages in addition to their mother tongue;
- promoting student mobility and participation in educational and cultural activities, including through a 'European Student Card';
- promoting cooperation of Member States on mutual recognition of higher education and school leaving diplomas at secondary education level in the appropriate framework;
- taking the opportunity of the European Year of Cultural Heritage to increase awareness of the social and economic importance of culture and cultural heritage.

---

<sup>8</sup> <https://www.consilium.europa.eu/media/32204/14-final-conclusions-rev1-en.pdf>

The Communication describes the Commission's vision to build a European Education Area combining:

- a strengthened Erasmus+ programme,
- an ambitious framework for European policy cooperation in education and training,
- support for Member State reforms through the European Semester,
- better targeted use of European funds.

It also describes ongoing initiatives to found European Universities and a European Student Card. This package of initiatives includes proposals for Council Recommendations:

- on Early Childhood Education and Care,
- on the Automatic Mutual Recognition of Diplomas and learning periods abroad,
- on improving the Teaching and Learning of Languages.

The Council Recommendation on a comprehensive approach to the teaching and learning of languages was adopted by education ministers at the Council meeting in Brussels on 22 May 2019<sup>9</sup>.

The European Education Area, from the Commission perspective includes the following initiatives – the Leaders are invited to discuss and give a strategic orientation on the following six key policy suggestions from the European Commission, without prejudice to the final decision on the next Multiannual Financial Framework:

1. boost the Erasmus+ programme for all categories of learners it already covers (pupils, students, trainees, apprentices and teachers) with the aim of doubling the number of participants and reaching out to learners coming from disadvantaged backgrounds by 2025;
2. work on a Council Recommendation on improving language learning in Europe, setting out a benchmark that by 2025 all young Europeans finishing upper secondary education have a good knowledge of two languages in addition to their mother tongue(s);
3. work on a Council Recommendation on the mutual recognition of higher education and school leaving diplomas/study periods abroad. This could be accompanied by a new process building on experiences from existing cooperation schemes to facilitate such recognition and take further the cross-border validation of training and lifelong learning certificates ('Sorbonne process');
4. strengthen the financing capacity of the Creative and Cultural Sectors Guarantee Facility by 2020 in order to allow banks and other financial institutions from an enlarged number of countries to significantly increase financing of small and medium-sized companies in the cultural and creative sectors;
5. work towards truly European universities which are enabled to network and cooperate seamlessly across borders and compete internationally, including the creation of a School

---

<sup>9</sup> [https://ec.europa.eu/education/education-in-the-eu/european-education-area\\_en](https://ec.europa.eu/education/education-in-the-eu/european-education-area_en)

of European and Transnational Governance (hosted by the European University Institute in Florence, Italy);

6. strengthen the European dimension of Euronews<sup>10</sup>.

There were several main topics defined as a key point for the higher education development:

- ✓ Increasing the mobility and introduction of a European Student Card,
- ✓ Encouraging the European University initiative,
- ✓ Mutual recognition of diplomas,
- ✓ Digital Education Action Plan,
- ✓ Key Competences for Lifelong Learning,
- ✓ Improving the teaching and learning of languages,
- ✓ Investing in education.

## 5.2. International Recommendations

**Lisbon Recognition Convention**<sup>11</sup> (1997) by Council of Europe and UNESCO provides a legal framework for the recognition of higher education and upper secondary qualifications (school leaving qualifications) that give access to higher education.

Ministers for Education of the European Higher Education Area committed to the long-term goal of automatic recognition of comparable academic degrees in the **Bucharest Communiqué**<sup>12</sup> (2012). Progress was made including through the work of the Pathfinder Group on Automatic Recognition, but the goal has not been reached yet.

Automatic recognition was included as a commitment by the countries in the European Higher Education Area (EHEA), agreed in the **Yerevan Ministerial Communiqué**<sup>13</sup> (2015), quoting:

- Within "A renewed vision: our priorities" – "... where automatic recognition of qualifications has become a reality so that students and graduates can move easily throughout it ..."
- Within "Commitments": "to ensure that qualifications from other EHEA countries are automatically recognised at the same level as relevant domestic qualifications".

---

<sup>10</sup> [https://ec.europa.eu/commission/sites/beta-political/files/leaders-working-lunch-key-policy-suggestions\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/leaders-working-lunch-key-policy-suggestions_en.pdf)

<sup>11</sup> <https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=090000168007f2c7>

<sup>12</sup> [http://www.ehea.info/Upload/document/ministerial\\_declarations/Bucharest\\_Communique\\_2012\\_610673.pdf](http://www.ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf)

<sup>13</sup> [http://www.ehea.info/media.ehea.info/file/2015\\_Yerevan/70/7/YerevanCommuniquéFinal\\_613707.pdf](http://www.ehea.info/media.ehea.info/file/2015_Yerevan/70/7/YerevanCommuniquéFinal_613707.pdf)

The new **"Sorbonne process"**<sup>14</sup> represents the politically and technically process for preparation of ground for automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of learning periods abroad.

The European Commission in the **Communication of Strengthening European Identity through Education and Culture**<sup>15</sup> (2017) set out a vision for the creation of a European Education Area by 2025 in which learning, studying and carrying out research will not be hampered by borders, including by removing obstacles to the recognition of qualifications.

### 5.3. EU Transparency Tools and Mutual Trust

**Quality assurance** in particular has a key role to play in improving transparency, helping to build the mutual trust. Therefore, it is important to build the model for automatic recognition on the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and the European Qualifications Framework for lifelong learning (EQF) (which integrates Bologna process, QF-EHEA, Qualifications Framework of the European Higher Education Areas).

**The Bologna Process** seeks to bring more coherence to higher education systems across Europe. It established the European Higher Education Area (EHEA) to facilitate student and staff mobility, to make higher education more inclusive and accessible, and to make higher education in Europe more attractive and competitive worldwide. As part of the EHEA, all participating countries agreed to:

- introduce a three-cycle higher education system consisting of bachelor's, master's and doctoral studies<sup>16</sup>,
- ensure the mutual recognition of qualifications and learning periods abroad completed at other universities,
- implement a system of quality assurance, to strengthen the quality and relevance of learning and teaching<sup>17</sup>.

**Learning outcomes** are key elements in transparent qualifications systems. Learning outcomes can be defined as a statement of what a learner is expected to know, understand and be able to demonstrate after completion of a process of learning, and may be written for

---

<sup>14</sup> [https://ec.europa.eu/commission/sites/beta-political/files/leaders-working-lunch-mutual-recognition-diplomas\\_en.pdf](https://ec.europa.eu/commission/sites/beta-political/files/leaders-working-lunch-mutual-recognition-diplomas_en.pdf)

<sup>15</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017DC0673&from=EN>

<sup>16</sup> "Short cycle" has been included in the Bologna Process in Yerevan 2015.

<sup>17</sup> [https://ec.europa.eu/education/policies/higher-education/bologna-process-and-european-higher-education-area\\_en](https://ec.europa.eu/education/policies/higher-education/bologna-process-and-european-higher-education-area_en)

a single module or programme component, a complete specific programme, a qualification level, or anything in between.<sup>18</sup>

**The European Credit Transfer and Accumulation System (ECTS)** is a tool of the European Higher Education Area for making studies and courses more transparent. It helps students to easily move between countries and to have their academic qualifications and study periods abroad recognised. ECTS allows credits taken at one higher education institution to be counted towards a qualification studied for at another. ECTS credits represent learning based on defined learning outcomes and their associated workload. ECTS enhances the flexibility of study programmes for students. It also supports the planning, delivery and evaluation of higher education programmes. It is a central tool in the Bologna Process, which aims to make national education systems more comparable internationally. ECTS also helps make other documents, such as the Diploma Supplement, clearer and easier to use in different countries.

ECTS simply measure the workload of students for related learning outcomes. ECTS has been adopted by most of the countries in the European Higher Education Area as the national credit system and is increasingly used elsewhere. 60 ECTS credits are the equivalent of a full year of study or work. In a standard academic year, these credits are usually broken down into several smaller modules. A typical 'short cycle qualification' typically includes 90-120 ECTS credits. A 'first cycle' (or bachelor's) degree consists of either 180 or 240 ECTS credits. Usually a 'second cycle' (or master's) degree equates to 90 or 120 ECTS credits. The use of the ECTS at the 'third cycle', or Ph.D. level, varies<sup>19</sup>. ECTS credits express the volume of learning based on the defined learning outcomes and their associated workload. Workload is an estimation of the time the individual typically needs to complete all learning activities such as lectures, seminars, projects, practical work, work placements [1] and individual study required to achieve the defined learning outcomes in formal learning environments. The correspondence of the full-time workload of an academic year to 60 credits is often formalised by national legal provisions. In most cases, workload ranges from 1,500 to 1,800 hours for an academic year, which means that one credit corresponds to 25 to 30 hours of work. It should be recognised that this represents the typical workload and that for individual students the actual time to achieve the learning outcomes will vary<sup>20</sup>.

**The Standards and guidelines for quality assurance in the European Higher Education Area (ESG)** were adopted by the Ministers responsible for higher education in 2005 following a proposal prepared by the European Association for Quality Assurance in Higher Education

---

<sup>18</sup> <http://eurorecognition.eu/Manual/EAR%20HEI.pdf>

<sup>19</sup> [https://ec.europa.eu/education/resources-and-tools/european-credit-transfer-and-accumulation-system-ects\\_en](https://ec.europa.eu/education/resources-and-tools/european-credit-transfer-and-accumulation-system-ects_en)

<sup>20</sup> [https://ec.europa.eu/education/ects/users-guide/key-features\\_en.htm](https://ec.europa.eu/education/ects/users-guide/key-features_en.htm)

(ENQA) in co-operation with the European Students' Union (ESU), the European Association of Institutions in Higher Education (EURASHE) and the European University Association (EUA). Since 2005, considerable progress has been made in quality assurance as well as in other Bologna action lines such as qualifications frameworks, recognition and promotion of the use of learning outcomes, all these contributing to a paradigm shift towards student-centred learning and teaching. Given this changing context, in 2012 the Ministerial Communiqué invited the E4 Group (ENQA, ESU, EUA, EURASHE) in cooperation with Education International (EI), BUSINESSEUROPE and the European Quality Assurance Register for Higher Education (EQAR) to prepare an initial proposal for a revised ESG “to improve their clarity, applicability and usefulness, including their scope’. The revision included several consultation rounds involving both the key stakeholder organisations and ministries. The many comments, proposals and recommendations received have been carefully analysed and taken very seriously by the Steering Group (SG)<sup>21</sup>.

The focus of the ESG is on quality assurance related to learning and teaching in higher education, including the learning environment and relevant links to research and innovation. In addition, institutions have policies and processes to ensure and improve the quality of their other activities, such as research and governance. The ESG apply to all higher education programmes offered in the EHEA regardless of the mode of study or place of delivery. Thus, the ESG are also applicable to all higher education programmes including transnational and cross-border provision. In this document the term “programme” refers to higher education in its broadest sense, including that which is not part of a programme leading to a formal degree. The ESG provide the criteria at European level against which quality assurance agencies and their activities are assessed<sup>22</sup>.

The **EQF (The European Qualifications Framework for lifelong learning)** is an 8-level, learning outcomes-based meta-framework for all types of qualifications that serves as a translation tool between different national qualifications frameworks. This meta-framework helps to improve transparency, comparability and portability of people’s qualifications and makes it possible to compare qualifications from different countries and institutions. The EQF covers all types and all levels of qualifications and the use of learning outcomes makes it clear what a person knows, understands and is able to do. The level of complexity of learning outcomes increases according to the level of proficiency – level 1 is the lowest and 8 the highest level. Most importantly the EQF is closely linked to national qualifications frameworks, this way it can provide a comprehensive map of all types and levels of qualifications in Europe, which are

---

<sup>21</sup> <https://enqa.eu/index.php/home/esg/>

<sup>22</sup> [https://enqa.eu/wp-content/uploads/2015/11/ESG\\_2015.pdf](https://enqa.eu/wp-content/uploads/2015/11/ESG_2015.pdf)

increasingly accessible through qualification databases. The EQF was set up in 2008 and later revised in 2017. Its revision has kept the core objectives of creating transparency and mutual trust in the landscape of qualifications in Europe. Member States committed themselves to further develop the EQF and make it more effective in facilitating the understanding of national, international and third-country qualifications by employers, workers and learners<sup>23</sup>. The EQF applies to all types of qualifications and covers the EU members states, European Economic Area countries, candidate countries, potential candidates and Switzerland.

The **Qualifications Framework for the EHEA (QF-EHEA)** is a European meta-framework for higher education system only. It covers national higher education systems of the Bologna Process members. The QF-EHEA reflects the “Bologna process qualifications” to the rest of the world.

The QF-EHEA, known as the Bologna Framework, and the EQF are overarching frameworks designed to act as a reference for different qualifications and education systems. The EQF includes all learning characterised by eight levels of descriptors, whereas the EHEA is restricted to Higher Education with “short cycle”, the first, second and third cycle of the Bologna process. The EQF has acted as a catalyst for NQF development. Both frameworks promote transparency and comparability of qualifications, mobility and the transfer of credits. This allows national education system, and qualifications to refer to the EQF levels.

#### 5.4. Key Elements of Qualifications in Recognition Practice

The Recommendation<sup>24</sup> on the use of qualifications frameworks in the recognition of foreign qualifications, by Council of Europe and UNESCO, gives one of the first attempts to facilitate the use of emerging qualifications frameworks, as important information and transparency tools, in the recognition of higher education qualifications and qualifications giving access to higher education. The Recommendation demonstrates ways in which qualifications frameworks may be helpful in establishing similarities between foreign qualifications and relevant qualifications within the education system in which recognition is sought, and whether or not there are substantial differences between qualifications. National qualifications frameworks have more transparency and recognition power when they have been linked in a transparent and cooperative way through self-certification and referencing processes to QF-EHEA and EQF. The Recommendation does not introduce the concept of

---

<sup>23</sup> <https://europa.eu/europass/en/european-qualifications-framework-eqf>

<sup>24</sup> Council of Europe, UNESCO, Subsidiary text to the Convention: “Recommendation on the use of qualifications frameworks in the recognition of foreign qualifications”, 2012, [https://www.enic-naric.net/fileusers/LRC\\_Subsidiary\\_Text\\_on\\_the\\_Use\\_of\\_QFs\\_ENGLISH.pdf](https://www.enic-naric.net/fileusers/LRC_Subsidiary_Text_on_the_Use_of_QFs_ENGLISH.pdf)



---

## Conceptual Analysis of Automatic Recognition of FHEQ and Learning Period

---

”automatic recognition” but still it stresses such possibility by use of qualifications frameworks naming it – facilitation the recognition processes.

This Recommendation on the use of qualifications frameworks in the recognition of foreign qualifications is quite important document which explicitly gives the principles in order to assure the effective use of qualifications framework in recognition practice. The principles are related to five key elements of qualifications – level, learning outcomes, quality, workload (i.e., ECTS and equivalent credit systems) and profile. It means that all the above-mentioned key tools are important for recognition process.

## 6. RECOGNITION POLICES, PRACTICES AND STRATEGIC PLANNING IN EU AND PARTNER COUNTRIES

### 6.1. Current Models on Automatic Recognition in Use in EU

Currently, there are four models of automatic recognition in use in the EHEA<sup>25</sup>:

- I. Legal bilateral and multilateral agreements;
- II. A legally binding unilateral list of degrees;
- III. Non-legal bilateral and multilateral agreements;
- IV. 'De facto' automatic recognition.

**I. Legal bilateral and multilateral agreements.** Bilateral agreements exist between countries with legally binding recognition decisions as well as countries where recognition decisions are advisory. When drafting an agreement, countries are focused on the general outlines, leaving the details to the competent recognition authority (in many countries higher education institutions and/or the ENIC-NARIC centre).

**II. A legally binding unilateral list of degrees.** This model is not based on agreements, as countries can decide unilaterally which qualifications from which countries to include.

**III. Non-legal bilateral and multilateral agreements.** It is focused on the regional cooperation within recognition as a steppingstone towards the final achievement of automatic recognition within the EHEA. In response to this recommendation the Nordic-Baltic countries jointly developed an admission manual.

**IV. 'De facto' automatic recognition.** De facto automatic recognition is a model where competent authorities in the EHEA automatically accept bachelor, master and doctoral qualifications from quality assured comparable degrees in other EHEA countries, without referring to formal procedures or agreements on automatic recognition.

#### 6.1. Croatia

**The Croatian Qualifications Framework (CROQF)** is a reforming instrument for regulation the qualifications system in the Republic of Croatia by using qualifications standards based on

---

<sup>25</sup> Nuffic (2018), A short path to automatic recognition - 4 models; <https://www.nuffic.nl/en/publications/short-path-automatic-recognition-4-models/>

learning outcomes and following the needs of the labour market, individuals and society. The level of a qualification in the CROQF is defined by the complexity of learning outcomes belonging to that qualification. The level of a qualification allows the comparison of different qualifications in Croatia but also their relation to the EQF and QF-EHEA, thus enabling the visibility of qualifications abroad<sup>26</sup>.

Study programme in Croatian higher education system can be academic (university) or professional. Academic study programmes qualify students to work in private and public sector and society in general, as well as to develop and apply scientific and professional knowledge and skills. Professional study programmes provide students with an appropriate level of knowledge and skills required to work in applied professions, as well as a direct integration in the working process.

Academic (University) study programmes have three levels: undergraduate, graduate and postgraduate, with some intermediate profiles. Professional study programmes are split into: short professional studies, undergraduate professional studies, and specialist graduate professional studies.

Undergraduate programmes normally last three (180 ECTS) to four (240 ECTS) years. Upon completion, students are awarded an academic title of Bachelor (sveučilišni prvostupnik) with reference to a discipline. Graduate programmes last between one (60 ECTS) and two (120 ECTS) years. The total number of credits earned after completing both undergraduate and graduate studies is at least 300 ECTS. Upon completion of both undergraduate and graduate studies, students are awarded an academic title of Master (magistar struke) with reference to a discipline. Postgraduate university studies are divided into specialist and doctoral studies. Specialist studies last for one to two years (60-120 ECTS). Upon completion, the student is awarded the title of University Specialist with reference to a specialisation (univ. spec.). Doctoral studies last three years (180 ECTS or without the use of ECTS). Upon completion of doctoral study, the academic title of Doctor of Science or Doctor of Arts is awarded.

Professional studies are divided into short professional studies, undergraduate professional studies, and specialist professional graduate studies. Short professional studies last two (120 ECTS) to two and a half (150 ECTS) years. Upon completion, students are awarded a professional title of "stručni pristupnik/pristupnica" with reference to a profession. Undergraduate professional studies last three (exceptionally four) years and students earn 180-240 ECTS credits. Upon completion of professional studies students are awarded a

---

<sup>26</sup> <https://www.azvo.hr/en/enic-naric-office/the-croatian-qualifications-framework-croqf>

Conceptual Analysis of Automatic Recognition of FHEQ and Learning Period

professional title of "stručni pristupnik/pristupnica" (Professional Bachelor) with a reference to a profession. Specialist professional graduate studies last one to two years and students can earn 60-120 ECTS credits. Upon completion, students are awarded a title of a specialist of the respective profession. The total number of credits earned after completing both undergraduate and graduate professional studies is at least 300 ECTS<sup>27</sup>.

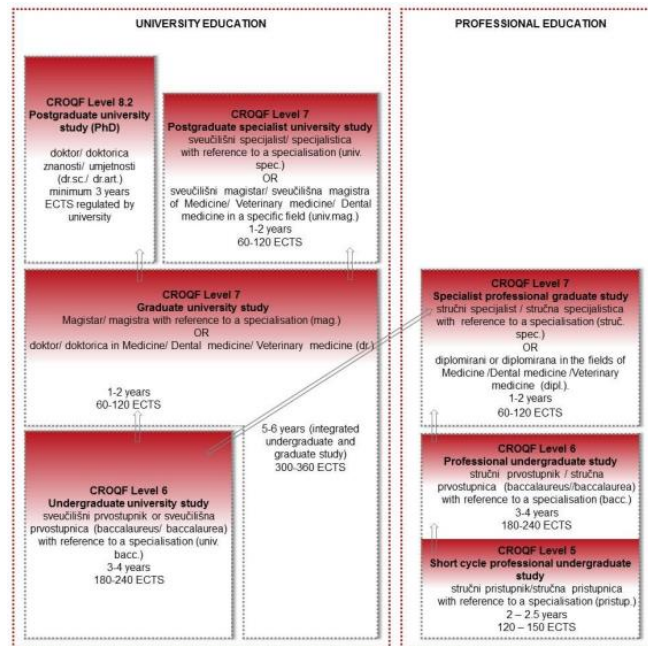


Figure 1: Illustration of higher education system in Croatia (source: Agency for science and higher education in Croatia).

**Recognition of foreign higher education qualifications.** The procedure for recognition of foreign higher education qualifications in Croatia is in line with the Lisbon Recognition convention as of 1 July 2004. The Act on the Recognition of Foreign Educational Qualifications (OG 158/2003, 198/2003, 138/2006, 45/2011) defines competent authorities, recognition procedures, conditions for the recognition, appeal procedures. The Act on the Croatian Qualifications Framework (OG 22/13, 41/16, 64/18) regulates the system of qualifications at all levels in the Republic of Croatia.

Recognition is a formal acknowledgment of the value of a foreign education qualification or period of study, issued by the competent authority, for the purpose of the continuation of education or employment. Croatian citizens, foreign citizens and persons without citizenship

<sup>27</sup> <https://www.azvo.hr/en/higher-education/types-of-study-programmes-in-the-republic-of-croatia>

are entitled to the recognition of foreign education qualifications. Recognition of foreign higher education qualifications is carried out for the following purposes:

- 1) continuation of education in Croatia (academic recognition and recognition of periods of study) – under the authority of Croatian universities, polytechnics and colleges;
- 2) employment in Croatia (professional recognition) – under the authority of the Agency for Science and Higher Education, Croatian ENIC/NARIC Office.

Recognition of foreign higher education qualifications is based on:

- the Act on Recognition of Foreign Educational Qualifications (Official Gazette, no. 158/2003, 198/2003, 138/2006 and 045/2011) and is carried out for the following purposes.

Recognition for the purpose of continuation of education (academic recognition) is under the authority of higher education institutions.

In accordance with the regulations the ENIC/NARIC Office within the Agency carries out the procedure of professional recognition of foreign higher education qualifications (for the purpose of enabling access to employment in the Republic of Croatia) and the following criteria have to be met in order to recognise a foreign higher education qualification:

- That a higher education institution which awarded a qualification had been accredited by a competent accreditation body in the state in which it is located;
- That a higher education qualification was awarded by an accredited higher education institution;
- That a foreign higher education programme had been accredited by a competent accreditation body of the respective state;
- When a joint degree is concerned, all institutions participating in the delivery of the study programme, as well as the study programme itself, have to be accredited by a competent accreditation body of the respective state in which the institution participating in the joint degree is located.

The Agency will not recognise a foreign higher education qualification if all the recognition criteria have not been met, in compliance with the international practice. The evaluation process refers to the assessment of the level or the degree of the individual's higher education qualification, in accordance with the Criteria for Evaluation of Foreign Higher Education Qualification. Optimal duration of the procedure for professional recognition of foreign higher education qualifications is two (2) months.

Procedure comprises several steps:

- 1) After receiving and processing the application Croatian ENIC/NARIC Office sends the information on required supplement if the application is not complete.
- 2) Croatian ENIC/NARIC Office verifies the accreditation of the institution which issued the foreign higher education qualification, the accreditation of the study program and, if necessary, the authenticity of the foreign higher education qualification for which recognition is sought, as well as the rights and opportunities that the qualification ensures in the country of issue.
- 3) The Agency for Science and Higher Education issues a decision on recognition of a foreign higher education qualification.
- 4) The decision on professional recognition of a foreign higher education qualification is sent by post to the applicant's address specified in the application form.<sup>28</sup>

The detailed procedure can be found at the website: <https://www.azvo.hr/en/enic-naric-office/guidelines-for-starting-the-procedure-for-professional-recognition-of-foreign-heq>

**Vision of the automatic recognition.** Steps to introduce automatic recognition in Croatia by 2025 defined by the Ministry of science and education:

- New legal framework for recognition in Croatia;
- Quality use of existing tools: NQF, Diploma Supplement, ECTS, ESG;
- Creating closer networks and new joint activities in the area of recognition;
- Opening discussions with project partners about the automatic recognition of comparable academic degrees<sup>29</sup>.

## 6.2. France

### 6.2.1. Academic recognition

It is a procedure that evaluates a foreign diploma against the French nomenclature of levels of education and the European Qualifications Framework for lifelong learning (EQF).

The principle of equivalence between a diploma (or equivalent title) obtained abroad and a diploma (or equivalent title) issued by the Ministry of National Education or the Ministry of Higher Education does not exist in France. The ENIC-NARIC Centre France issues certificates of comparability and certificates of recognition of periods of study. The attestation of comparability establishes a comparison between a final diploma obtained abroad and a level

---

<sup>28</sup> <https://www.azvo.hr/en/enic-naric-office/recognition-of-foreign-education-qualifications-in-croatia>

<sup>29</sup> [http://www.aic.lv/portal/content/files/Development\\_of\\_automatic\\_recognition\\_projects\\_in\\_Croatia.pdf](http://www.aic.lv/portal/content/files/Development_of_automatic_recognition_projects_in_Croatia.pdf)

Conceptual Analysis of Automatic Recognition of FHEQ and Learning Period

of French and European qualifications frameworks. The attestation of recognition of periods of study evaluates periods of study that did not lead to a final diploma and is mainly useful in the context of further studies: it can help the head of the establishment to authorise a study exemption.

Generally speaking, the certificate of comparability or recognition takes into account the original diploma with all the characteristics of the education system to which it belongs (duration of studies, academic prerequisites, etc.).

In accordance with the Lisbon Convention, in order to establish a reliable and fair comparison of the foreign diploma with the French system, the experts of the ENIC-NARIC France centre use an analysis grid composed of 10 criteria established on the basis of international texts and the good practices of the ENIC-NARIC network.

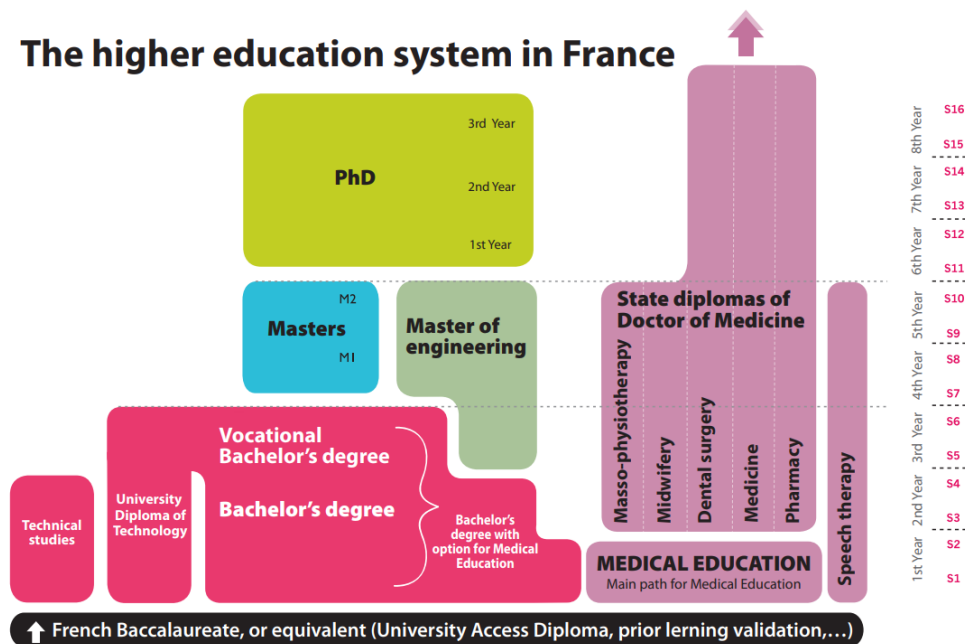


Figure 2. The scheme of French HEI system

6.2.2. Professional recognition

Depending on whether the diploma relates to the exercise of a regulated profession - requiring a specific diploma as an architect, for example - or an unregulated profession, the procedure is different:

- To have a diploma for access to a regulated profession recognised, the procedure is different according to each profession (cf: Directive 2005/36/EC which defines the regulated professions). It depends on the profession and whether the diploma was obtained in a country of the European Union or outside the European Union. There are about 80 regulated professions, see the list on [www.ciep.fr/profession-glossary](http://www.ciep.fr/profession-glossary).
  - The paramedical professions: contact your regional JCSR
  - Trade and craft professions (butcher, baker, hairdresser, electrician, plumber, dental technician, bodyworker, etc.): contact the Chamber of Trades and Crafts.
  - legal professions (solicitor, notary clerk, bailiff, etc.): contact the Ministry of Justice.
  - For certain jobs such as driving school instructor, car technical inspector, real estate agent: contact the Prefecture.
  - For professions governed by a National Order or Council: contact this body. For example, the National Order of Physicians, the Council of the Order of Pharmacists, the National Council of the Bar Associations for Lawyers, the National Council of the Order of Midwives,
- To have a diploma related to a non-regulated profession recognised, a certificate of comparability can be requested from the ENIC NARIC of the country where you wish to practise. This certificate is not compulsory, but most institutions and employers consult it to judge whether the diploma is suitable for the job or for the entry level required to apply for the job, the competition or the training.

### 6.2.3. Professional experience recognition

Within the French education system, several approaches for recognising formal, non-formal and informal experience have emerged since 1985. Today, the most widespread is the validation des Acquis de l'Expérience (VAE), a procedure that also exists in various English-speaking countries under several different names, including "accreditation of prior experiential learning", "recognition of NIL" (Non-formal and Informal Learning) and "recognition of prior experience". For the purposes of this report, we shall use the latter.

In France, the VAE is an individual right enshrined in the Social Modernization Law of 2002, the Labour Code and the Code of Education. It is a procedure for obtaining all or part of a recognized qualification (university degree, professional diploma or professional qualification certificate) via the formal recognition and accreditation of skills acquired through prior experience and learning, notably work experience. The French Labour Code (Article L900-1)



defines the VAE as the right of any person who has been working for at least three years to validate the experience acquired with a view to obtaining a degree, professional diploma or certificate among those registered in the Répertoire National des Certifications Professionnelles (RNCP, the national directory of professional certification). The French Code of Education states that recognition of prior experience produces the same effects as the testing or proof control of knowledge and aptitudes.

All publics are thus concerned by the VAE procedure: salaried workers, regardless of their status (permanent or fixed-term contracts, temporary workers, etc.); the self-employed (members of the liberal professions, farmers, artisans, retailers and merchants, freelance workers, etc.); public officials (incumbents or not); job seekers (receiving benefits or not); volunteers with experience working for an association or trade union; and any person, with or without recognized qualifications, wishing to obtain, complete or adapt such qualifications with the aim of returning to work. The VAE procedure applies to all of the degrees, professional diplomas and qualification certificates registered in the RNCP, on condition that the rules for obtaining said qualifications do not prohibit the implementation of this procedure (notably for health, safety, or national security reasons).

**The prior experience and/or learning that can give rise to recognition include all professional skills acquired during employment, self-employment or volunteer work, continuous or not for a cumulative total period of at least three years, and related to the content of the qualification or degree concerned.** Periods of initial or continuing education, internships and vocational training undertaken for the preparation of a degree or diploma are not included in the duration of the experience taken into account. The candidate's knowledge and skills, and their adequacy with respect to those required by the framework of the degree, diploma or certificate, are assessed by a recognition committee composed of teachers and professionals. The committee may also take into account studies pursued and completed in a foreign country.

### **The French higher education system and VAE procedures**

The procedures for validating formal, non-formal and informal experience are laid down in the following legislation:

- Decree no. 85-906 of 23 August 1985.
- Article 133 of the Social Modernization Law of 17 January 2002.
- Decree no. 2002-590 of 26 April 2002: VAE in higher education.

---

## Conceptual Analysis of Automatic Recognition of FHEQ and Learning Period

---

- Decree no. 2002-615 of 26 April 2002: VAE and professional certification.
- Decree no. 2002-529 of 16 April 2002: Validation des Études Supérieures (VES, recognition of graduate studies).

This legislation allows for obtaining access to training and/or the awarding of all or part of a degree or diploma thanks to the recognition of prior experience and/or learning.

Three historical stages make up the recognition of formal, non-formal and informal experience in the French higher education system. The first stage was introduced with the Decree of 1985, which defines the terms of the Validation des Acquis Personnels et Professionnels (VAPP, recognition of personal and professional experience). This decree is specific to the French higher education system and determines the conditions under which prior studies, professional and personal experience can be validated for access to different levels of tertiary education. It states that recognition may be awarded for any studies followed by the candidate in a public or private educational institution or structure, whatever the conditions, duration and method of approval, as well as for professional experience gained during employment, when self-employed, on work placement or internship, or for all knowledge and skills acquired outside of any educational system. This Decree is still used and complements the existing text on the recognition of prior experience (VAE).

The second stems from the Law of 20 July 1992 and introduced the possibility of obtaining part of a national degree through the recognition of the skills acquired in the exercise of professional activities. The aim of these first two procedures is to shorten the time spent in education or training for anyone with experience related to the particular degree or diploma they wish to obtain.

Finally, the third stage stems from the Social Modernization Law of 17 January 2002, which opened up the possibility of granting any type of degree or certification based only on the prior experience of the candidate. This is the law that led to the creation of the Validation des Acquis de l'Expérience (VAE) procedure. A specific decree was issued for higher education degrees, repealing the provisions of the Law of 1992.

***The main provisions of the Law of 2002 and the Decree concerning higher education can be summarized as follows:***

- Is concerned, anyone who has at least one year of professional and/or extra-professional experience related to the degree, diploma or certificate they wish to obtain.
- All professional diplomas and certificates registered in the RNCP ([www.cncp.gouv.fr](http://www.cncp.gouv.fr)) are available under this procedure.
- Can result in recognition, all experience relevant to the exercise, continuous or not and for a cumulative period of at least three years, of salaried, self-employed or volunteer activities. This experience must justify all or part of the knowledge and skills required for obtaining the degree, diploma or certificate concerned.
- The candidate must submit a portfolio detailing the knowledge, skills and abilities he/she has acquired through this experience. The portfolio includes documents attesting to this experience and the duration of the various activities during which the candidate acquired it, as well as, where appropriate, any diplomas or certificates corresponding to training received and degrees obtained previously.
- The recognition committee is appointed by the Chancellor of the University. It comprises a majority of faculty members as well as professionals working in a field other than teaching and who are competent to assess the nature of the experience (notably work experience) for which the recognition is requested. A balanced representation of women and men is sought in the composition of the committee.
- The committee reviews the candidate's portfolio and meets with him/her to discuss it. It then determines the knowledge and skills that it deems can be validated, and can decide to grant the full degree.

The Law of 2002 also provides the possibility of recognising a candidate's academic experience, with recognition being awarded for all third-level studies followed by the candidate in a public- or private-sector institution or training organization, in France or abroad, whatever the conditions and duration of said studies. This is known as the Validation des Études Supérieures (VES, recognition of graduate studies). For French universities, all qualifications are concerned by the VAE procedure, from the Diplôme d'Accès aux Études Universitaires (DAEU), a diploma granting secondary education "Baccalauréat" equivalence and access to university studies, right up to Ph.D. level (Figure 1).

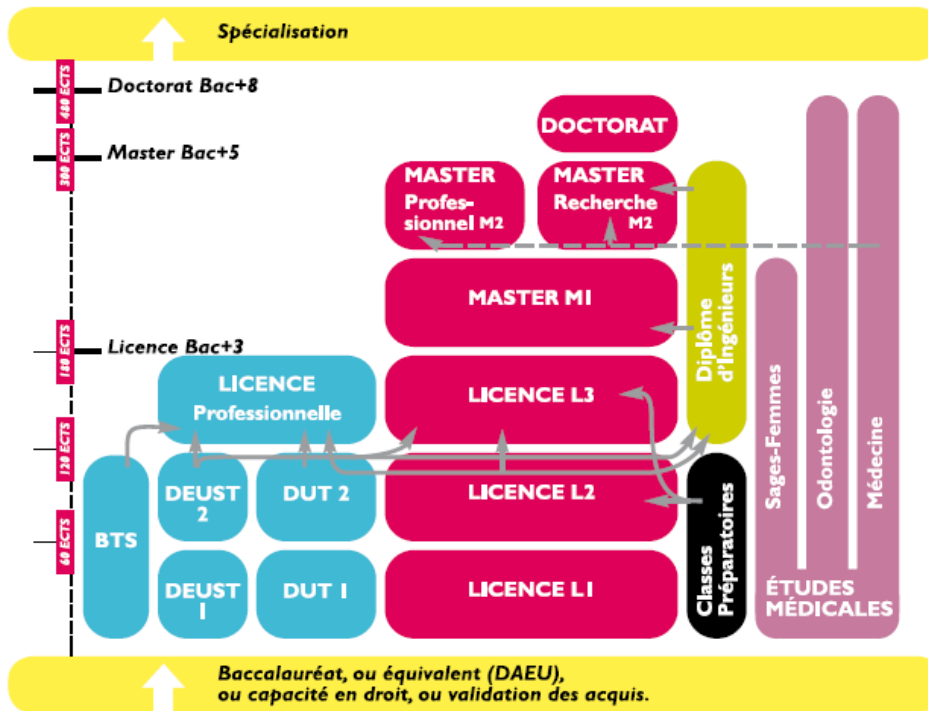


Figure 3: Diagram of studies within French universities

This law is sometimes presented as something of a “revolution” and it does indeed represent a new way of gaining access to qualifications, notably degrees awarded by universities. Prior experience is now considered to be fully equivalent to an academic background in initial or continuing education (formal education).

The French legislative framework also provides for the possibility of funding for the university to support and coach the VAE candidates. Several different sources of funding exist, including regional councils, businesses, authorised joint collection bodies for “individual training leave”, a French professional training system for employees), or the individuals themselves.

### 6.3. Germany

Development of the German Qualifications Framework for lifelong learning (DQR) is based on the EQF and QF-EHEA. Germany has referenced and self-certified its qualifications framework to the EQF and the QF-EHEA in 2012 and 2008, respectively.

The DQR has eight levels that describe complexity of learning outcomes independently on the type of qualifications. In principle, all DQR levels should be accessible via different education pathways. Level descriptors of the DQR levels 5 to 8 are allow allocation of academic and vocational qualifications. Qualifications Framework for higher education qualifications in Germany include three cycles – first, second and the third cycle (levels 6 to 8).

The aim of the DQR is to make the German qualification system more transparent, to support reliability, permeability and quality assurance and to increase the comparability of qualifications. The Federation and the Länder agree that the allocation of qualifications to levels does not replace the existing system of qualifications. The allocation takes place in accordance with the principle that each qualification level should always be accessible via various educational pathways. The DQR is the first framework to cover all qualifications of the German education system across all educational sectors.

In higher education, the EQF and DQR levels are shown in the Diploma Supplement only for qualifications that are listed in the annually updated "List of Assigned Qualifications" (qualifications obtained after the Joint Resolution came into force, 2013).

All details on the DQR are presented in the DQR Manual<sup>30</sup>, which serves as a guide to authorities which are responsible for allocating qualifications to the DQR. It specifies the criteria and procedures for the description of qualifications for the DQR. The intention is to ensure that the allocation of newly developed qualifications always follows the same criteria and procedures.

Individuals that want to work in a regulated profession (e.g., doctor, lawyer or architect) in Germany need recognition of their foreign academic qualifications. Detailed information on recognition procedures of foreign qualifications is presented on the official web sites<sup>31,32</sup>. There is no need for the recognition of foreign qualifications for further study or a work in an academic, non-regulated professions, such as computer scientists, mathematician or economist.

The Statement of Comparability is an official document which describes a foreign academic qualification and indicates the level of German higher education qualification to which the foreign qualification is comparable. the individual statement can be requested from the

---

<sup>30</sup> [https://www.dqr.de/media/content/DQR\\_Handbuch\\_01\\_08\\_2013.pdf](https://www.dqr.de/media/content/DQR_Handbuch_01_08_2013.pdf)

<sup>31</sup> <https://www.make-it-in-germany.com/en/jobs/recognition/procedure>

<sup>32</sup> <https://www.anerkennung-in-deutschland.de/html/en/index.php>

Central Office for Foreign Education in Bonn, which can be helpful for application for a job, changing jobs or negotiation of salary.

Comment by Jonathan: There isn't any automatic recognition procedures (as described as Legal bilateral and multilateral agreements) yet. In addition to the practice of recognition, there should be descriptions on the Bachelor, Master and doctorate-degrees that the German system recognise as part of the Bologna agreement/ Lissabon agreement (the general rule here is that recognition can only be rejected if there is a significant difference in the skills acquired). Essentially, one defines that if certain competencies are missing, it can be assumed that, for example, one cannot successfully achieve the degree or cannot work in the field because essential skills are missing). There should be description on recognition on competences as part of the academic education. There should maybe also be a short note on the legal framework of the Lisbon Convention, which we already had integrated in the other sections of the draft, but which obligates every institution in Germany on recognize every accredited degree from other countries as well as examination results.

## 6.4. Malta

### 6.4.1. Academic recognition

**Legislation.** The legislation listed below regulates the recognition for further and higher education in Malta, in line with the Lisbon Recognition convention and the EU Directive on Recognition of Professional Qualifications. The aim of the legislation is to maintain, uphold, enhance and improve standards. This legislation also takes into consideration the 2012 European Regulations for Further and Higher Education, including the European Standards for Guidelines and Quality Assurance in the Higher Education Area and the European Quality Assurance Reference Framework for Vocational Education and Training (EQAVET).

The Malta Qualifications Recognition Information Centre (MQRIC) is the competent body, within the National Commission for Further and Higher Education (NCFHE), that recognises qualifications against the Malta Qualifications Framework and European Qualifications Framework (EQF). MQRIC is also the local official ENIC-NARIC centre and a member of the ENICNARIC network. Malta is signatory to the Lisbon Recognition Convention (LRC) of the Council of Europe and UNESCO, which is the primary international treaty regulating the recognition of foreign qualifications as applicable to MQRIC.

Malta legislation on recognition:

- [SL 327.431 – Malta Qualifications Framework for Lifelong Learning Regulations](#)
- [Chapter 451 of 2002 – Mutual Recognition of Qualifications Act](#)

- [SL 451.01 - Malta Qualifications Recognition Appeals Board Regulations](#)
- [SL 451.02 - Mutual Recognition of Higher Education Qualifications in the European Regions Regulations](#)
- [SL 451.03 - Recognition of Professional Qualifications Regulations](#)
- [Lisbon 1997 - Convention on the Recognition of Qualifications Concerning Higher Education in the European Region](#)
- [Directive 2013/55/EU amending Directive 2005/36/EC on the recognition of professional qualifications](#)

**Guidelines.** When assessing and evaluating qualifications, MQRIC applies the following criteria for the recognition of qualifications where applicable:

- Education system in the given country;
- Status of awarding body and programmes of studies - The status of a qualification can be determined through the accreditation of a programme of studies and awarding body and/or institution that conferred the qualification, and the internal assessment of learning outcomes achieved by students;
- Level on the National Qualification Framework (NQF);
- Comparability Studies carried out by other ENIC and NARIC centres;
- Previous recognition practices of similar qualifications.

The [Malta Qualifications Framework \(MQF\)](#) is a referencing tool that helps to describe and compare both national and foreign qualifications to promote quality, transparency and mobility of qualifications in all types of education. It is mainly referenced to the European Qualifications Framework for lifelong learning (EQF) as well as to other non-European qualifications frameworks.

MQRIC uses the Malta Qualification Framework (MQF) and the European Qualification Framework for lifelong learning (EQF) to provide recognition advice on a qualification.

The Malta Qualifications Framework (MQF) is a meta-framework designed to include all learning outcomes achieved in a formal, informal and non-formal education system. MQF is referenced to both the EQF and QF EHEA thus linking Malta's long-standing system of qualification to that of other countries in order to promote mobility of students and workers and ensuring that all learning is valued.

The reference levels make it easier to understand what a learner with a qualification related to the Malta Qualifications Framework knows, understands and is able to do. These levels are neutral reference points to be used for all qualifications irrespective of whether they arise

from academic or vocational education; formal, informal and non-formal learning. These are useful for education and training providers as they describe the knowledge, skills and competences and a set of learning outcomes which indicate to the learner the end of a learning process.

### Reference levels used for the purpose of recognition

(from Subsidiary Legislation 327.431: Malta Qualifications Framework for Lifelong Learning Regulations).

8	Doctoral Degree	
7	Master's Degree Post-graduate Diploma Post-graduate Certificate	
6	Bachelor's Degree	
5	Undergraduate Diploma Undergraduate Certificate	VET Higher Diploma Foundation Degree
4	Matriculation Certificate Advanced Level Intermediate Level	VET Diploma (iv)
3	General Education SEC Grade 1-5	VET Level 3 (iii)
2	General Education Level 2 SEC Grade 6-7	VET Level 2 (ii)
1	General Education Level 1 School Leaving Certificate	VET Level 1 (i)

#### 6.4.2. Professional recognition

**Legislation.** The Mutual Recognition of Professional Qualifications is an important aspect of the free movement of citizens throughout the EU and through Malta, which requires input of knowledge workers and skilled workers. This is governed by Directive 2005/36/EC on the Recognition of Professional Qualifications which has been transposed into national legislation primarily by means of the Mutual Recognition of Qualifications Act 2002 (Cap 451) and the Recognition of Professional Qualifications Regulations (S.L. 451.03). The law lays down the framework through which regulated professions are to be recognised by 'Designated Authorities' being the entities responsible for each individual regulated profession.

**Guidelines.** The requirements of mutual recognition vary depending on the profession and on whether the individual wishes to:



- Permanently settle and practice a profession in a host Member State (what is known as ‘establishment’) in which case recognition is required, or
- Practice the profession on a temporary or occasional basis in host Member State in which case the individual will need to submit a declaration to the Designated Authority concerned.

The regulated professions database provides information on which professions are regulated by which authority in other Member States. This is an important tool for those wishing to establish themselves or provide services on a temporary basis in other Member States.

Registration and submission of documents for the practice of the professions is managed by the competent professional authorities. The professional can appeal against a negative decision of the competent Authority. Each authority should indicate the appeal procedure in its legislative act and website. If no mention is made in the legislative act the professional can appeal to the Mutual Recognition of Qualifications Appeals Board.

#### 6.4.3. Status of automatic recognition

**Automatic academic recognition.** Automatic recognition occurs within the framework and guidelines of the Malta Referencing Report, issued by NCFHE. The report serves as the national document which describes the Malta Qualifications Framework and the different levels of qualifications. It provides details of the parameters which need to be respected for the recognition of qualifications for the purpose of eligibility and conferment of qualifications. The Malta Referencing Report enables national qualifications to gain recognition both in Malta, the European Union, Commonwealth countries, the United States and other countries.

The practical route to ensure automatic recognition for the purpose of SEA-EU programmes is to obtain approval to list the programmes on the Approved Get Qualified Programmes issued by the Malta Ministry of Education and Employment.

**National and institutional vision on automatic recognition.** In the Bologna Process Implementation Report, issued by the European Higher Education Area, Malta is rated in the top two tiers of countries which have successfully incorporated the principles of the Lisbon Recognition Convention in national legislation: to enable applicants have right to fair assessment; there is recognition if no substantial differences can be proven; legislation or guidelines encourage comparing of learning outcomes rather than programme contents; in cases of negative decisions the competent recognition authority demonstrates the existence of substantial difference.

**Automatic professional recognition.** Automatic professional recognition varies and depends on the professional associations administering the recognition process. Some professional bodies such as the nursing association provide automatic recognition. Others association have implemented internal check on qualifications, within the context of the Malta Referencing Framework, which provides guidelines on the equivalence of qualifications.

### 6.5. Poland

The **Polish Qualifications Framework (PQF)** regulates the qualification system at all levels in the Republic of Poland by means of qualification standards based on defined learning outcomes, taking into account the needs of the labour market in Poland. PQF is an element of the Integrated Qualifications System introduced by the Act of 22 December 2015 "On the Integrated Qualifications System" (Dz. U. 2020.226, of 2020.02.12).

The **Integrated Qualifications System** provides:

- 1) the quality of the awarded qualifications;
- 2) the possibility of recognizing learning outcomes obtained in non-formal education and through informal learning;
- 3) the possibility of staged accumulation of achievements and recognition of achievements;
- 4) access to information about qualifications that can be obtained on the territory of the Republic of Poland;
- 5) possibility of comparing qualifications obtained on the territory of the Republic of Poland with qualifications awarded in other Member States of the European Union.

The **Polish Qualifications Framework** is used to classify qualifications included in the Integrated Qualifications System according to the individual eight levels. Each of them is described by learning outcomes - general statements that characterize the knowledge, skills and social competences requirements that must be met by people with a given level of qualification. The Polish Qualifications Framework is based on the Qualifications Framework for the European Higher Education Area – QF-EHEA. A unique solution applied in Poland is the introduction, apart from universal characteristics (first degree), of the second degree PQF levels. Within higher education, second-cycle qualifications for levels 6-8 are relevant. The place of each qualification obtained in Poland is determined on the basis of the level of learning outcomes belonging to that qualification. Placing qualifications in PQF at appropriate levels makes it possible to compare and combine different qualifications with qualifications in

QF-EHEA, which allows to compare qualifications obtained in Poland on the Polish and European labour market.

Academic and professional education (at universities) is provided under the following degree studies: I (bachelor's), II (master's) and uniform master's, as well as post-graduate studies. Academic study programs qualify students to work in sciences subdivided into scientific disciplines and higher education, in the private and public sectors and in society in general, and to develop and apply scientific and professional knowledge. Professional study programs provide students with the appropriate level of knowledge and skills required to work in applied professions, as well as direct integration into the work process.

Bachelor's programs typically last from six (180 ECTS) to seven (210 ECTS) semesters. Upon graduation, students receive a bachelor's degree with a reference to a specialization. Master's programs typically last from three (90 ECTS) to four (120 ECTS) semesters. Uniform Master's studies last ten semesters (300 ECTS). The total number of credits obtained after completing the undergraduate and graduate studies is at least 300 ECTS. After completing both the master's (post-bachelor's) with a reference to a specialization.

Engineering studies are divided into bachelor's degree studies and engineering master's studies. The first of them last seven semesters (210 ECTS) and the second last three semesters (90 ECTS). Upon completion of the Bachelor's degree in engineering, students receive the professional title of engineer with a reference to a specialization, and upon completion of the master's degree in engineering, students are awarded the professional degree of Master of Engineering with a reference to a specialization. The total number of credits obtained after completing bachelor's and master's studies is at least 300 ECTS.

Postgraduate studies are studies for candidates with qualifications of at least PQ 6 qualification (BA, BSc or MA diplomas). These studies last from two to four semesters. After graduation, the graduate receives a certificate of completion (not a diploma).

In Poland, doctoral studies (as independent third-cycle studies) were abolished by the Act on Higher Education and Science (Dz.U.2018.1669 of 2018.08.30) in favour of doctoral schools established in universities for individual disciplines of science, providing a similar type of education for a period of four years. The current doctoral studies lasted from two to four years and their activity will end in 2022. The doctoral degree was and is currently awarded only after completing the procedure set out in the Act on Higher Education and Science (Dz.U.2018.1669 of 2018.08.30) and the Regulation of the Minister of Science and Higher Education (Dz.U.2018.261 of 2018.01.19).

**Recognition** is a formal acknowledgment of the value of a foreign education qualification or period of study, issued by the competent authority, for the purpose of the continuation of education or employment. Polish citizens, foreigners and persons without citizenship have the right to recognize foreign diplomas obtained in education.

Recognition of higher education qualifications and a period of study:

- a) in order to continue education in Poland (academic recognition and recognition of study periods) - under the authority of Polish universities;
- b) in order to work in Poland (recognition of professional qualifications) - under the authority of a relevant ministry and professional organizations (according to government administration departments).

Recognition of professional specializations and exams - under the authority of the relevant ministry and professional organizations (Dz.U.2020.220 of 2020.02.12).

Recognition of diplomas obtained abroad takes place in order to take up employment (recognition of professional qualifications) or continue education (recognition of academic qualifications) in Poland and is based on the Act on Higher Education and Science (Dz.U.2020.85 of 2020.01.20, Dz.U.2018.1669 of 2018.08.30).

**Recognition of foreign higher education diplomas.** Pursuant to the Act on Higher Education and Science (Dz.U.2018.1669 of 2018.08.30), Poland recognizes diplomas issued by an authorized university operating in the higher education system of a member state of the European Union, the Organization for Economic Cooperation and Development (OECD) or the European Agreement on Free Trade (EFTA) - parties to the agreement on the European Economic Area. Information on diplomas, level of studies and the status of the university that issued it is granted at the request of the interested entity by the National Agency for Academic Exchange (NAWA, Dz.U. 2019.1582).

**Procedure for professional recognition.** The method of recognizing professional qualifications obtained in the territory of the European Union Member States in order to work in one of the Member States (also applies to the EEA and Switzerland) is determined by EU regulations. The main legal act regulating this area is Directive 2005/36/EC of the European Parliament and of the Council of September 7, 2005 on the recognition of professional qualifications (Dz.U. UE L 255 of September 30, 2005, p. 22, as amended) which allows citizens of the EU and EFTA Member States to pursue a regulated profession or activity in a Member State other than the one in which they obtained their professional qualifications.

The directive was implemented into Polish law by the Act of 22 December 2015 on the principles of recognition of professional qualifications acquired in the Member States of the European Union (Dz.U.2016.65 and Dz.U.2018.650).

Details of the procedure can be found at the website:

<https://www.gov.pl/web/nauka/uznawanie-kwalifikacji-zawodowych-1>

## 6.6. Spain

The Royal Decree 285/2004, of February 20, regulates the conditions of professional (homologación) and academic recognition (equivalencia) of foreign degrees and studies of higher education.

The Spanish Ministry of Education and Professional Training, in accordance with the aforementioned law and standards distinguishes two types of university Bachelor degrees:

- 1) those that enable the access or exercise of regulated professional activities, for which they require the establishment by the Government of the conditions to which the University Curricula and study plans must be adapted, so as to guarantee that the degrees certify the possession of the competences and adequate knowledge for a particular professional practice and,
- 2) those without such status as qualifiers for access to a regulated profession.

For this reason, the royal decree provides for the professional recognition (homologación) of a foreign degree to a Spanish university degree that gives access to a regulated profession in Spain and, for the rest of cases, the possibility of obtaining a recognition (equivalencia) at an academic level corresponding to a specific area.

As for the professional recognition, which is reserved exclusively in the case of qualifying degrees for the exercise of regulated professions, it will be carried out taking into consideration the regulations that establish the requirements for the verification of the official university qualifications that qualify for the exercise of the corresponding professions (health sciences, engineering, law).

The ISCED reference system, in combination with the Spanish division into 5 branches of knowledge, has been adopted for the determination of academic recognition of foreign degrees. Nevertheless, they must meet, as far as possible, the following requirements: be

compatible with Spanish regulations and at the same time, internationally recognized; adapt to various contexts of higher education; be clearly and objectively similar to the disciplinary field in the Spanish system.

**Procedures.** The body responsible for supervising recognition procedures is the Ministry of Education and Professional Training. There exists a permanently open call for the different types of recognition, namely:

- 1) Professional recognition of foreign higher education degrees to official Spanish Bachelor's or Master's degrees that give access to a regulated profession in Spain.
- 2) Academic recognition of a foreign higher education degree to official university Bachelor's or Master's degrees in branches of knowledge and specific fields.
- 3) Recognition of Degrees obtained in the European Union for the exercise of professions in application of Directive 2005/36 / EC
- 4) Agreements on Recognition for academic purposes with Germany, Italy, France, China, Argentina, Chile and Colombia. This recognition of university degrees and studies, for exclusively academic purposes, which complements the professional recognition systems (academic and professional effects) and academic recognition (only professional effects), derives from bilateral agreements with these particular countries.

Applications should be accompanied by the following documents:

- A certified copy of the document accrediting the identity and nationality of the applicant, issued by the competent authorities in the country of origin or residence or by the Spanish authorities competent in matters concerning foreign nationals; in the case of Spanish nationals, a certified photocopy of the person's identity card.
- A certified copy of the qualification that the applicant wishes to have accredited or of the document certifying the issue of the qualification.
- A certified copy of the academic certification of the studies carried out to obtain the qualification, indicating the official duration in academic years of the study plan undertaken, the subjects studied and the hours of study that each subject represents.
- Proof of payment of the corresponding fee.
- The documents must meet the following requirements:
- Documents issued abroad must be official and must be duly legalized either by an Embassy or Consulate or by an "Apostille of the Hague" (with the exception of studies carried out in the European Union).

The documents must be accompanied by a corresponding official translation into Spanish.

The procedure of professional recognition (homologación) will be completed approximately within six months of the date on which the application was received by the registry offices of the Ministry of Education.

For more information on how to obtain official recognition of foreign academic qualifications, please consult the website of the Ministry of Education and Professional Training:

<http://www.educacionyfp.gob.es/servicios-al-ciudadano/catalogo/gestion-titulos/estudios-universitarios/titulos-extranjeros.html>

## 6.7. An Example of Practices in EU

### 6.7.1. Nordic Region

The formalised cooperation between the Nordic countries is one of the oldest and most extensive regional cooperatives in the world. It is based on shared values and a willingness to achieve results that contribute to the Nordic region's development and competitiveness.

The Nordic cooperation includes 5 countries and 3 autonomous territories: Denmark, Finland, Iceland, Norway, Sweden, the Faroe Islands, Greenland and Åland.

The Nordic countries have a goal of creating a good education and research community – for children, young people and adults in terms of mobility, quality, and political priorities. To strengthen their cooperation, the Nordic countries have signed several contracts and agreements in different areas including education.

One example is the agreement on a Nordic education community at upper secondary level. The agreement applies to both general and vocational education. The Nordic countries mutually undertake to provide applicants with access to the countries' regulated general and vocational education. Participants apply on the same conditions as the country's own citizens. The agreement recognises applicants with their qualifications. They may apply for the same type of education in their home country as in the country where they have completed their upper secondary education. Partly completed education is also covered by the agreement.

In 2016, the ministers for education in the Nordic Region signed the revised Reykjavik declaration, which aims to introduce automatic recognition of comparable educational qualifications in the Nordic Region.

---

## Conceptual Analysis of Automatic Recognition of FHEQ and Learning Period

---

In June 2018 a new service was launched allowing people with higher education from the Nordic countries to download a document confirming that their degree is automatically recognised in the country.

This scheme will simplify the assessment of education obtained abroad and will include the vast majority of recent degree programmes in the Nordic countries. The approval document shows the degree to which the foreign education corresponds to the Norwegian education system. The courses included range from bachelor to doctoral degrees.

### 6.7.2. Norway example - NOKUT

NOKUT offers automatic recognition of some degrees from Denmark, Finland, Iceland, Lithuania, Poland and Sweden. Automatic recognition consists of a standardized statement, which confirms that a foreign degree is equivalent to a Norwegian degree. You can download and use the statement immediately, without first having to submit an application for recognition.<sup>33</sup>

---

<sup>33</sup> <https://www.nokut.no/en/foreign-education/automatic-recognition-of-qualifications/>



## 7. SEA-EU PROJECT ACTIVITIES INVOLVING AUTOMATIC RECOGNITION PROCESS

In the implementation of the SEA-EU project the process for automatic recognition of qualifications is included in following tasks:

- Task 2.1. – Educational analysis;
- Task 2.2. – Working for development of joint educational policies and procedures: recognition of qualifications;
- Task 2.4. – Digitalisation, SEA-EU European University card;
- Task 3.1. – Increasing European mobility of students and staff;
- Task 4.1. – Personalised content curricula and transversal skills development;
- Task 5.5. – Co-creation within the Alliance and with external parties. White paper on recognition of non-formal and informal learning.