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# **REPORT**

**TO THE BOLOGNA FOLLOW UP GROUP**

**ON THE ANALYSIS OF**

**THE 2007 NATIONAL ACTION PLANS FOR RECOGNITION**

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**September 2008**

In their London Communiqué, Ministers asked the Bologna Follow-up Group (BFUG) “to arrange for the ENIC/NARIC networks to analyse our national action plans and spread good practice”.

The ENIC and NARIC Networks appointed a working party for this purpose, and the Council of Europe Secretariat commissioned Professor Andrejs Rauhvargers and Ms. Agnese Rusakova to draft the study.

The working party was served by the Council of Europe Secretariat and had the following composition:

Ms. Carita Blomqvist (Finland, Chair)  
Ms. Gayane Harutunyan (Armenia)  
Ms. Christoph Demand (Austria)  
Ms. Elpida Keravnou-Papaeliou (Cyprus)  
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Mr. Luca Lantero (Italy)  
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Mr. Bruno Carapinha (European Student Union)

Mr. Ruard Wallis de Vries (European Commission), Ms. Venera Ionița and Mr. Peter Wells (UNESCO/CEPES) have also participated in the work of the group. The Council of Europe Secretariat has been represented by Mr. Sjur Bergan and Mr. Jean-Philippe Restoueix.

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# Executive summary

## Part I

**Ratification.** 38 out of 46 'Bologna' countries had ratified the Convention on the Recognition of Qualifications Concerning Higher Education in the European Region (Lisbon Recognition Convention) at the time when the National Action Plans (NAP) were prepared. Andorra, Germany, Turkey and the Netherlands added their ratifications later. Belgium and Italy have signed the Lisbon Recognition Convention but not ratified it; Greece and Spain have not signed the Lisbon Recognition Convention.

**Legislation review.** Quite a number of countries have not provided any timetable or details of organization of the review of national legislation. A significant number of countries state that their legislation is already in compliance with the Lisbon Recognition Convention even if it has not been amended after joining the Lisbon Recognition Convention. In reality, while there may be no explicit contradiction between national legislation and the *letter* of the legal framework of the Convention, a doubt remains if there is also no contradiction with the *spirit* of the Lisbon Recognition Convention and its subsidiary texts.

Some countries use outdated terminology which is linked to concepts that are not compatible with the Lisbon Recognition Convention. Thus, at least five countries still use term *nostrification* which is linked to a recognition concept seeking full identity of the foreign qualification, or the term *equivalence*. None of those is used in the Lisbon Recognition Convention or its subsidiary texts because they are linked with the outdated principle where the main focus of assessment was on detailed comparison of curricula and lists of material studied.

**Legal and autonomy-related implementation difficulties.** In some cases countries report problems to implement the Lisbon Recognition Convention because the national legislation contradicts with the legal framework of the Lisbon Recognition Convention. This indicates that the country should either amend its legislation or ensure that the superiority of the international legislation is observed.

Some countries non-acceptably report that since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles of the Lisbon Recognition Convention are followed. Thus, these countries, through their "laissez faire" approach, actually do not fulfil the requirements of the Lisbon Recognition Convention to take all possible steps to application of the Lisbon Recognition Convention provisions in higher education institutions.

One good solution to this issue is making the recognition of qualifications in higher education institutions part of quality assurance which will then assess compliance with the Lisbon Recognition Convention. Another solution is that the state bodies that monitor observation of law in higher education institutions also monitor observation of the Lisbon

Recognition Convention principles. A less favourable solution mentioned by some countries is that recognition decisions are made by a central body: the Minister or somebody in his/her name and not by higher education institutions.

**Follow-up measures.** In most countries the follow-up procedures planned are not involving amendments of legislation but rather information and dissemination measures.

**Bilateral agreements.** Not all countries have bilateral recognition agreements. The number of bilateral agreements is typically 5-10/country. Bilateral recognition agreements are often concluded either among geographically/ historically close countries or with countries that are not part of the European region and are therefore not covered by the Lisbon Recognition Convention.

It is worth considering the proposal not to conclude further bilateral agreements with Parties to the Lisbon Recognition Convention in order to support the implementation of the Lisbon Recognition Convention in the countries involved in the Bologna process.

## **Part 2 Recognition practice**

Nearly all the countries declare that the recognition criteria and procedures they use are in compliance with the Council of Europe/UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study.

### **Procedures**

**Authenticity and translations.** Practice in some countries still seems to be exaggerated - requesting that all documents be presented are officially translated and have 'apostille' is burdensome to the applicants while the verbatim official translations may appear misleading from a recognition point of view. A good practice seems to be not to require translations if the documents are in widely spoken languages. Countries mention e.g. English, German, French, Spanish, also Latin.

**Comparing qualifications with the relevant host country's qualification.** With few exceptions the recognition procedures include comparing the foreign qualification in question with the relevant qualification in the host country.

Some countries have invented a procedure whereby it is possible to recognize a foreign degree as a general degree or as corresponding to a certain Bologna cycle without comparing to a particular host country's qualification. It is not clear, however, whether this recognition procedure, which is claimed to be less time-consuming and simpler, gives the holder full rights in further studies and labour market or is it just a *pro forma* statement with little legal consequences. Some examples of unacceptable practice demonstrate that some countries tend to assess the foreign institution and programme using quite formal criteria rather than relying on the information on the status of institution and programme provided by the country of origin – which is mentioned as an important principle by a number of other countries.

A clearly positive development is moving away from seeking that the foreign qualification can replace the relevant home qualification in all aspects towards comparing only those aspects relevant to the right, which the holder of the qualification is trying to exercise.

In some countries there are separate avenues for different kinds of qualifications, so assessment can be done using different procedures or by different bodies depending on the profile ('academic' or 'applied'/'professional'), level – 'postgraduate' (doctoral and Master degrees) can be treated separately from Bachelor degrees, 'Bologna' degrees – separately from 'pre-Bologna' and finally depending on whether the Master degree has been obtained in the same field (and institution) which awarded Bachelor degree.

**Partial recognition.** In many countries partial recognition is possible if there is substantial difference. Looking at the recognition criteria mentioned in the NAPs a question still remains whether granting partial recognition in each particular case is a good or a bad practice - has it been applied because some important learning outcomes of the foreign qualification were missing so that the applicant was not able to pursue the intended learning or professional activities; or is it rather because the content of studies was not identical.

**Links between procedures of academic and professional recognition.** Many countries report that academic recognition often has consequences for the recognition for the non-regulated part of the labour market. An alarming finding, however, is, that some countries require full academic recognition (including comparison of programmes carried out by higher education institutions) if the applicant intends to enter a regulated profession. There seems to be a growing number of countries that attempt to assess qualifications even in those cases when evidence is incomplete or lacking.

**Recognition procedure: in two stages, but which?** In many cases the first stage ends with issuing a statement that serves as a recommendation to the competent authority which takes the decision (often a higher education institution). However, this is not the only possibility. There are various two-stage procedures in different countries that are not compatible with each other. For instance, recognition for further studies and 'establishing of equivalence' can be the result of the second stage of recognition in some countries, but serving as the result of the first stage in others. In the latter case it looks like in some countries the second stage rather resembles the earlier nostrification. A discussion is needed at European level to clarify the terminology used and the stages of the recognition procedure with a view to agree upon coherent and mutually understandable procedures across Europe.

**Criteria.** The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess teaching staff of an institution in another country. The contemporary approaches include e.g.: taking into account differences in the educational systems, counting on quality and trusting quality assurance in other countries, assessing learning outcomes wherever possible, attempting to take into account prior learning, taking into account the previous recognition practices in similar cases. Adding the purposes for which

recognition is sought and study workload seems to make an up-to date approach to recognition.

However, a number of countries mention such criteria as contents of the curriculum and length/duration of the programme instead of e.g. learning outcomes. This seems quite backward-looking approaches.

### **Role of the national ENIC/NARIC in academic and professional recognition**

The most typical case is that the national information centre is an advisory body for both academic and professional recognition, while the decisions are taken:

- for academic recognition - by higher education institutions,
- for *de facto* professional recognition in non-regulated professions – by employers,
- and for regulated professions – by competent authorities of each profession.

There are several other possibilities:

- ✓ ENIC/NARIC is the decision-making body for all cases of recognition,
- ✓ ENIC/NARIC centre makes decision in the name of Minister,
- ✓ Decisions are taken by Minister/Vice Minister/ Ministry upon advice of:
  - ENIC,
  - higher education institutions or
  - committees of academics/scientists.

In a number of countries ENIC/NARIC makes recognition decisions with a view of employment in non-regulated professions.

In most cases the *de jure* professional recognition for employment in regulated professions is carried out by competent authorities (often professional organizations) nominated by government, but in some countries the specific Ministries are in charge.

**Attempts to improve recognition criteria and procedures.** Not all countries plan any measures to improve recognition practices as a result of the review of legislation and procedure. The main measures countries plan to improve procedures and criteria are: ensuring possibilities for applicants to appeal, dissemination of information on recognition criteria and procedures among all stakeholders, updating the criteria for recognition according to the latest developments in the Bologna Process, establishing databases of recognition decisions, assisting higher education institutions and monitoring the drawing up and implementation of institutional regulations. It should be noted that the countries that already demonstrate the best recognition practices also plan most measures for improvement.

**Time required for recognition.** In most cases the recognition procedures are within a three-month limit and they are even shortening.

**Joint degrees.** In the 2005-2007 period a number of countries have changed their legislation with regard to joint degrees. Another group of countries states that while the law does not specifically mention joint degrees, there are no legal obstacles for their establishment either. However, lack of mentioning joint degrees in the legislation does not necessarily mean that there are no legal obstacles to awarding them. Obstacles to joint degrees often rise from various regulations that have been prepared without regard of joint degrees.

A number of countries still have no possibility to award state –recognized joint degrees and therefore they use joint programmes as the way out. The graduates would then receive one degree from their “home’ institution.

In several countries Ministry, rectors’ conference, ENIC-NARIC, or these organisations in cooperation have prepared guidelines for establishing joint programmes.

Most countries state that their legislation allows recognition of joint degrees (meaning joint degrees from abroad that are submitted for recognition). In the majority of cases countries mention the criteria listed in the Recommendation on the Recognition of Joint Degrees as the criteria they use for recognition of joint degrees.

**Institutional practices.** A number of countries either do not answer this part or just inform that they do not have any information on institutional practices and rather describe the measures that ENIC/NARIC centre takes in order to assist institutions. Just a few countries have actually carried out institutional reviews but not all of them describe the results in their NAPs. There are only a couple of countries that can report that the institutions follow common guidelines or use common recognition procedures. The institutional practices seem to be better coordinated in those cases where recognition of qualifications at higher education institutions is included in the quality assurance system. In some cases the institutional reviews have indicated that higher education institutions still have difficulties with recognition of study periods/ credits and therefore need more information and training.

The institutional procedures in recognition of credits may range from comparing learning outcomes to looking for full compliance with their own curricula.

**Diploma Supplement.** Many countries made issuing of Diploma Supplements compulsory between 2002 and 2005. In 2007 in more than half the countries all graduates receive DS automatically; free of charge and in a widely spoken language. If countries that issue a DS upon request are also included, 2007 graduates receive Diploma Supplements in two-thirds of the countries. There are, however, several countries that seem to apply DS to the graduates of the “new style” Bachelor and Master degrees but do not issue DS to graduates from the “old style” long one-tier study programmes.

It should nevertheless be recalled that in the Berlin Communiqué (2003), Ministers set the objective that every graduating student receive the Diploma Supplement automatically, free of charge and in a widely spoken language by 2005. The National Action Plans show

that even at the end of 2006, half of the Bologna member states had yet to comply with the Ministers' commitment.

Some countries have created national versions of the Diploma Supplement but it is not clear from the NAPs if the "national" diploma supplements fully follow the EU/Council of Europe/UNESCO Diploma Supplement format and how much they are customized. Most countries issue the DS in both the national language and a widely spoken European language (most often English), but there are also countries where the one in a widely spoken European language is available only on request.

**Implementation of ECTS.** While the implementation of ECTS as a credit transfer and accumulation system is indeed progressing, there are a number of issues to be noted:

- ✓ In quite a number of countries credit systems are used for both transfer and accumulation.
- ✓ Not all countries, however, use ECTS itself; there are a number of cases where ECTS-compatible national credit system is used.
- ✓ ECTS key features should be further discussed and fine-tuned so that all countries can adhere to the definitions therein.
- ✓ There are some countries where credit system is implemented but it does not yet apply to all higher education.
- ✓ In most countries implementation of ECTS so far has not concerned linking credits with learning outcomes. There is a growing understanding that linking credits with learning outcomes is an important component of the credit system; however implementation of this feature of ECTS will still take time.
- ✓ A good practice seems to be using quality assurance as a tool for implementation of ECTS, i.e. setting implementation of ECTS as a quality requirement.

**Transnational/ borderless education.** Countries express their good will to give green light to *bona fide* transnational/ borderless education, but they also express concerns about possibilities to access information on quality of transnational education, possibilities to check whether the transnational e-learning has been properly assessed and whether allocation of credits for work experience has been properly done. These issues have often been discussed but proper solutions are yet to come.

**Information provision.** The quality of information provision seems to be quite different in different countries. With regard to information provision the spectrum is quite broad. It ranges from such countries that have excellent information for applicants in their national language and in English (or other widely spoken European languages) available online, in printed and possibly in other forms; to countries where only minimum information is provided in the national language only and this information may be available at the ENIC/NARIC centre. An example of good practice is that provision of recognition information is coordinated between ENIC/NARIC and the higher education institutions so

that the specific information from higher education institutions adds on to the general information provided by the ENIC/NARIC.

Information on educational systems is well established in some countries, but some countries only provide general information on their educational systems that contains too little information actually needed for credential evaluation.

**Capacity development.** Competence development is underlined as an important aspect by a number of ENICs. The main kinds of capacity building measures inside ENICs are staff training and regular updating, participation in the ENIC/NARIC joint meetings, study visits, organising national or regional training and dissemination events (Nordic, Baltic countries, and others), preparing detailed manuals for staff, recruiting of staff with specific knowledge of education and/ or language skills relevant to different world regions. Another important part of capacity building is organising different dissemination and training events for the recognition staff of higher education institutions and providing guidance to higher education institutions.

Again, many of those important measures seem to be present in a number of most well supported and developed national information centres while a number of others mainly mention study visits or have not given any notion of capacity building measures at all.

**Cooperation between recognition and quality assurance bodies.** Information on quality assurance is used in the daily work of credential evaluation. In a number of countries the ENIC/NARIC centres widely use the information on quality assurance when assessing foreign qualifications. They also provide to other ENIC/NARICs with information on quality assurance status of programmes and institutions in their countries. As the information on quality assurance is often accessible online, the above does not necessarily mean that ENICs/NARICs have intensive daily contacts with their own country's quality assurance body.

The most far-reaching agreement between ENIC/NARICs and quality assurance bodies is the Joint declaration by some of the countries participating in the European Consortium for Accreditation in Higher Education. Its final goal – eventual automatic recognition of qualifications however can only be reached through a long-term bilateral work. It has been noted that recognition and quality assurance bodies often discuss the relevant issues and work together at various national working groups or during workshops, especially in those devoted to establishment of national qualifications frameworks. Quality assurance is a powerful implementation tool of the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance system of institutions and programmes.

# CONCLUSIONS AND RECOMMENDATIONS

## Conclusions

1. Four 'Bologna' countries currently remain that had not ratified the Lisbon Recognition Convention as of May 12, 2008: Belgium and Italy that have signed the Convention but have not ratified it, and Greece and Spain which have not signed the Convention.
2. The NAPs demonstrate that there are still legal problems to implement the principles of the Lisbon Recognition Convention and its subsidiary texts in those countries that have not amended their legislation adopting the above principles.
3. In some countries there are difficulties to implement the principles of the Lisbon Recognition Convention and its subsidiary texts due to interpretation of autonomy of higher education institutions. The best way to overcome these difficulties is making recognition process a part of both internal quality assurance of higher education institutions and external quality assurance.
4. The NAPs clearly demonstrate that the terminology used in different countries with regard to recognition is too diverse and unclear. The same terms have different meanings in different countries and in other cases different terms are used in different countries. It creates misunderstandings and certainly does not improve mutual understanding.
5. The terminology used in the national legislation of some countries uses terms 'nostrification' and 'equivalence' which are outdated concepts of recognition and not compatible with the principles of the Lisbon Recognition Convention.
6. Some countries that have bilateral recognition agreements with other countries have not updated these agreements according to the principles of the Lisbon Recognition Convention.
7. To support implementation of the Lisbon Recognition Convention new bilateral agreements among Parties to the Convention should not be concluded. If applicable, bilateral recommendations could be developed by these countries.
8. In some countries the requirements for translation and legalization of documents are exaggerated. Countries should look for possibilities to reduce the number of documents translated.
9. In most countries the recognition procedure includes comparison of the foreign qualification with the relevant qualification in the host country. Some countries have started an 'easier' recognition procedure recognizing the general level of the qualification without comparing it to a particular host country's qualification. While the overall development seems positive, it should be clarified what rights that kind of recognition gives to the holder.

10. In most countries the recognition procedure involves two steps, but these steps can differ: the first step varying from recognition statement which is advice to the competent authority making decision upon recognition for further studies or 'equivalence' statement. The second step in turn varies from decision upon recognition for further studies to 'full comparability' with issuing of host countries diploma. The steps of the procedure must be discussed at European level and steps should be taken to make procedures more coherent.
11. The ENIC/NARIC centre can have a different role in the diverse national recognition procedures: its statement on recognition can be advice to higher education institutions or advice to Minister or other central body taking decision, or the ENIC/NARIC centre itself may be the competent authority making decisions. This is yet another issue where European practices are different and it should be part of the European discussions that will be initiated in order to come up with proposals for more coherent procedures and criteria across the EHEA.
12. The criteria used and their relative importance varies from country to country. The contemporary approaches use quality assurance status, learning outcomes and level as the main criteria; some others first look at contents of the curriculum and length/ duration.
13. The time used for recognition procedure seems not to deviate much from the recommended 3 months and is much shorter in some cases; therefore time for recognition generally does not seem to be an issue.
14. A number of countries have amended their legislation to allow establishing of joint degrees, others state that there are no legal obstacles for establishment of joint degrees, as the law does not specifically mention them. However, NAPs demonstrate that lack of mention of joint degrees in the legislation does not necessarily mean that there are no legal obstacles to award them.
15. In many countries ENIC/NARIC centres have a very limited knowledge regarding the institutional recognition practices and outcomes of assessment at the higher education institutions. It also means that those countries cannot guarantee application of internationally approved principles in their higher education institutions. A more intensive cooperation should be established between the national ENIC/NARIC centres and higher education institutions for both better support and guidance to higher education institutions and for better information on the recognition procedures and decisions at higher education institutions.
16. Diploma Supplement is implemented in many countries. In some countries it is implemented in just part of the higher education system. It is not always clear whether DS is issued to graduates of all levels of qualifications and whether the 'national' diploma supplements are fully following the European Diploma Supplement format.
17. Implementation of ECTS or compatible national credit systems is progressing. However, credits are not yet linked with learning outcomes. In some countries ECTS is implemented only for the 'new' Bachelor and Master programmes. Using quality assurance as a tool for ECTS implementation might help the process.

18. While there is a good will to respect the bona fide borderless education provision in some countries, in a small number of countries the transnationally earned qualifications are not recognized at all. The main principles for recognition of transnational qualifications quoted in the NAPs are those recommended by the Code of Good Practice in the Provision of Transnational Education.
19. The quality of information provision both on own higher education system and on the recognition procedures and criteria is very different in different countries. Providing information being one of the main tasks of the ENIC/NARIC centres, there is a clear need to improve information provision in some of them.
20. There is a close cooperation between recognition and quality assurance bodies since the recognition bodies intensively use quality assurance information. Due to the fact that quality assurance information is often available online and that ENIC/NARIC centres successfully obtain the necessary information from abroad through the ENIC/NARIC channels, the cooperation between the national recognition and quality assurance bodies may not be so visible. The cooperation between the two becomes closer because of work on national qualifications frameworks and because quality assurance can be used as a tool for proper implementation of the Lisbon Recognition Convention.

## **Recommendations**

### **To the Ministers**

1. Ministers of those 'Bologna' countries that still have not become Parties to the Lisbon Recognition Convention are recommended to sign and/or ratify the Convention without further delay.
2. Ministers of those countries that have not amended their legislation to adopt the principles of the Lisbon Recognition Convention and its subsidiary texts are recommended to assist their Ministries in preparation of the amendments in line with the principles of the legal framework of the Lisbon Recognition Convention.
3. Ministers of those countries that have not amended their legislation to allow and encourage establishment and recognition of joint degrees are recommended to do so.
4. Ministers of all countries are recommended to include? quality of institutional recognition procedures into the internal quality procedures of the higher education institutions and also include it into the external quality reviews.

### **To the ENIC and NARIC Networks**

1. Take up work in order to clarify the differences in terminology used in the recognition legislation and practices of different countries and take steps to move towards a coherent terminology across the EHEA.
2. Organize discussion between the national ENIC /NARIC centres to clarify the differences in the recognition criteria and procedures among the countries. On the basis of that discussion, taking into account new developments in the European Higher Education Area and the results of the Working party on Substantial Differences a revised Recommendation on the Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study will be drafted by the Bureau of the Lisbon Recognition Convention Committee.
3. On the basis of the above discussion as well as new developments in the EHEA and the results of the WP on Substantial Differences a revised Recommendation on the Criteria and Procedures should be drafted and submitted to the Committee of the Lisbon Recognition Convention for adoption in 2010.

### **To national ENIC/NARIC Centres**

1. ENIC/NARIC centres of those countries that have not amended their legislation adopting the principles of the Lisbon Recognition Convention and its Subsidiary texts are recommended to assist their Ministries in preparation of the amendments for adoption of principles of the legal framework of the Lisbon Recognition Convention.
2. With a view of improving mutual recognition with countries outside the European Higher Education Area, the ENIC/NARIC centres are encouraged to apply the principles of the Lisbon Recognition Convention also at assessment of qualifications from such countries that are not Parties of the Lisbon Recognition Convention.
3. Provide information, guidance and counselling to the higher education institutions to help them establish and maintain recognition procedures based on the principles of the legal framework of the Lisbon Recognition Convention.

### **To higher education institutions**

1. Make the recognition of qualifications a part of the internal quality assurance of the institution.
2. Draw up institutional guidelines and recommendations for recognition ensuring implementation of the principles of the Lisbon Recognition Convention across the institution.
3. Ensure implementation of the Lisbon Recognition Convention at the level of faculties and departments
4. Cooperate with other higher education institutions and the national ENIC/NARIC centre with a view to ensure coherent recognition across the country

## Introduction

Mutual recognition of qualifications is a prerequisite for mobility of students, staff and graduates, and thus is also one of the cornerstones of a genuine European Higher Education Area (EHEA).

At their 2005 conference in Bergen the European Ministers responsible for higher education<sup>1</sup> committed themselves to ensuring the full implementation of the principles of the Lisbon Recognition Convention, and to incorporating them in national legislation as appropriate. They called the participating countries to address recognition problems identified by the ENIC<sup>2</sup> & NARIC<sup>3</sup> networks in their Strasbourg Statement of 2004<sup>4</sup> and to draw up National Action Plans (NAPs) to improve the quality of the process associated with the recognition of foreign qualifications. The National Action plans for Recognition had to be prepared according to guidelines<sup>5</sup> adopted by the ENIC and NARIC networks. The deadline for submission was December 15, 2006.

In their London Communiqué, Ministers asked the Bologna Follow-up Group (BFUG) “to arrange for the ENIC/NARIC networks to analyse our national action plans and spread good practice”. The ENIC and NARIC Networks appointed a working party for this purpose, and the Council of Europe Secretariat commissioned Professor Andrejs Rauhvargers and Ms. Agnese Rusakova to draft the study. The working party was served by the Council of Europe Secretariat and had the following composition:

Ms. Carita Blomqvist (Finland, Chair)  
Ms. Gayane Harutunyan (Armenia)  
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Mr. Ruard Wallis de Vries (European Commission), Ms. Venera Ionița and Mr. Peter Wells (UNESCO/CEPES) have also participated in the work of the group. The Council of Europe Secretariat has been represented by Mr. Sjur Bergan and Mr. Jean-Philippe Restoueix.

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<sup>1</sup> The European Higher Education Area - Achieving the Goals. Communiqué of the Conference of European Ministers Responsible for Higher Education, Bergen, 19-20 May 2005, [http://www.aic.lv/ace/ace\\_disk/Bologna/Bergen\\_conf/050520\\_Bergen\\_Communique.pdf](http://www.aic.lv/ace/ace_disk/Bologna/Bergen_conf/050520_Bergen_Communique.pdf)

<sup>2</sup> ENIC network – Council of Europe and UNESCO European Network of National Information Centres on academic recognition and mobility

<sup>3</sup> NARIC network – the EU Network of National Academic Recognition Information Centres

<sup>4</sup> ENIC& NARIC networks Strasbourg Statement on recognition issues in the European Higher Education Area, adopted at the 11<sup>th</sup> Joint meeting of the ENIC and NARIC networks, Strasbourg, 8-9 June, 2004, [http://www.aic.lv/ace/ace\\_disk/Bologna/Statem/ENICStrasStat.pdf](http://www.aic.lv/ace/ace_disk/Bologna/Statem/ENICStrasStat.pdf)

<sup>5</sup> Guidelines for National action plans for recognition. Approved by the Bologna Follow Up Group, Vienna April 7, 2006  
[http://www.aic.lv/ace/ace\\_disk/2005\\_07/Nat\\_actpl/Actionplan\\_Guidelines\\_31May2006.pdf](http://www.aic.lv/ace/ace_disk/2005_07/Nat_actpl/Actionplan_Guidelines_31May2006.pdf)

Most countries involved in the Bologna Process submitted the National Action plans – although many with a substantial delay. The five countries that did not submit National Action plans were Azerbaijan, Holy See, Luxembourg, Moldova and Portugal. Russia submitted a document of a somewhat different character – the “Plan of activities aimed at supporting the development of export of educational services for the period up to the year 2008” which included some elements relevant to recognition of qualifications.

First of all, the National Action Plans for Recognition are a collection of best practice, not so good practice, and in some cases even unacceptable practice. The plans should therefore be further analyzed and used for making proposals to improve recognition. . A number of countries either have amended their legislation with regard to recognition within the last couple of years or are currently analyzing the recognition practices with a view to make adjustments in the legislation or procedures. At the same time, far not all the countries have provided answers to all the points of the Guidelines for the National action plans and therefore in several aspects it is not easy to draw conclusions about EHEA as a whole.

Analyzing the NAPs was a difficult exercise because of the diverse quality of the National Action Plans. It should also be admitted that while the document is called “plan”, most of the NAPs actually are rather reports on the status quo and in many cases contain little information on what the countries intend to do to improve recognition. It can also be admitted that in some cases important questions were not asked in the Guidelines for National Action Plans, e.g. within the section on joint degrees.

Regarding the content of the NAPs - while some countries have submitted NAPs whose structure corresponds to the Guidelines for National Action Plans for Recognition and which comprised all the information requested, others prepared their National Action Plans without answering a number of questions or changing the structure of the document. Particularly, quite a number of countries in their National Action Plans have dealt with the organizational issues of the legislation review, the planned follow-up activities and recognition procedures at national and institutional level together and when doing so often did not provide the expected details on each of these aspects. In chapter 1.2 instead of information on review of national legislation many countries have just provided a list of national laws and regulations concerning recognition without information on how those legislative documents regulate recognition processes.

One general conclusion from the analysis of the National Action Plans for Recognition is that the recognition practices and even the terminology used vary greatly between the countries and that definitely does not help mutual understanding. This issue has to be discussed further in the ENIC and NARIC networks, since mutual and shared understanding is a cornerstone when discussing joint criteria and procedures for recognition. Very few countries have actually provided information on recognition procedures at higher education institutions and just five countries had actually carried out a survey of institutional practices. Not all countries have indicated such issues as the time that the recognition procedures take until the recognition statement is issued, few report on applicants’ possibilities to appeal the recognition statement or on the costs the applicant has to pay for the assessment/recognition of their qualifications.

As regards information provision, most countries have not distinguished between information provision on own higher education system to be provided for recognition of own qualifications abroad and the information package for applicants seeking recognition of foreign qualifications.

# 1. Legislation

## ***1.1. Ratification of the Lisbon Recognition Convention.***

38 out of 46 'Bologna' countries had ratified the Lisbon Recognition Convention at the time when the National Action Plans were prepared. Germany and Turkey ratified the Convention later in 2007, the Netherlands in the beginning of 2008 and Andorra later in 2008. As of September 12, 2008, Belgium and Italy had signed the Convention and currently are at different stages of internal arrangements in order to ratify it. Greece and Spain had not signed the Convention.

Most of the above countries declare in their National Action Plans that despite not having ratified the Convention, their recognition practices are already in line with its main principles. Indeed, the good will may be there and indeed there is evidence that at least in some of those 'Bologna' countries that are not yet parties of the Convention the recognition procedures applied may be among the examples of good practice. However, while a voluntary application of the Convention may at least partly resolve recognition issues for incoming foreign qualifications, such a voluntary compliance with the Convention will only work "until a problem comes" and if it comes, there will be no legal obligations to the country to follow the Convention. At the same time, the "good behaviour" of the country with regard to incoming students wouldn't help the outgoing students – in the case of assessment of qualifications from a country that has not ratified the Lisbon Recognition Convention, the Convention principles will naturally not be binding to the competent authorities of other countries. It is worth admitting that some of the countries that have signed the Lisbon Recognition Convention but have not ratified it actually disseminate the Convention principles and practices.

### ***Summary***

38 out of 46 'Bologna' countries had ratified the Lisbon Recognition Convention at the time when the National Action Plans were prepared, while Andorra, Germany, the Netherlands and Turkey added their ratifications later. Belgium and Italy have signed the Convention but not ratified it; Greece and Spain have not signed the Convention.

## ***1.2. Review of national legislation relevant to recognition***

The questions in the template for national action plans invited countries to submit information on

- a. The timetable and organization of the review of national legislation (including secondary legislation);
- b. Steps envisaged as a result of the review, e.g. as regards amending national legislation where needed and an indicative timetable for such amendments.

- c. When and how the outcomes of this review will be published;
- d. How partners in the European Higher Education Area will be informed of the outcomes.

### **Review of legislation**

This part of the National Action Plans appears to be somewhat confused. Quite a number of countries have not provided any timetable or details of organization of the review of national legislation. One reason why no plans to review legislation are presented could be that at the time when these countries prepared their National Action Plans they already had completed a review of their national legislation. However, another possibility remains that those countries that have not indicated a timetable for review of their legislation are actually not planning to do so.

Another group of countries provides a list of legal acts concerning either specifically recognition or dealing with higher education in general in this section of their National Action Plans, in most cases without or with little explanation of the way how these legal acts address the principles of the Lisbon Recognition Convention and its subsidiary texts. Thus, the answers are there, they demonstrate that legislation of these countries addresses recognition but are not particularly helpful for any further analysis or comparisons with other countries. A third group of countries describe issues that are more related to recognition criteria and procedures and thus do not address legislation review or plans to make legal changes already in this chapter instead of providing legislation review. All-in-all, not so many countries have provided details about their legislation review or plans to carry it out. In many cases it also remains unclear how the country in question is able to inform other countries and – maybe more importantly – those who seek recognition.

A significant number of countries state that their legislation is already in compliance with the Lisbon Recognition Convention and its supplementary documents. Several of those countries, e.g. Austria, Estonia, Hungary, Finland, Lithuania, Romania, the Slovak Republic and others explicitly state that their national legislation has been adopted or amended on the basis of principles laid down in the Lisbon Recognition Convention and its subsidiary texts. Finland, where incorporation of the Convention principles into national legislation has also been done through several laws adopted or amended after the ratification of the Lisbon Recognition Convention, has in addition issued a government document explaining the principles of the legal framework of the Lisbon Recognition Convention. Several countries, e.g. Italy, Romania, Slovenia, Spain and others mention that legislation they have adopted in the recent years simplifies recognition procedures.

It should be mentioned as an example of good practice that several countries are applying the Lisbon Recognition Convention principles to all applicants including those whose qualifications originate from countries that have not ratified the Convention. Such

developments are clearly in line with the Strategy for the External Dimension of the Bologna Process adopted by the Ministers at their London Conference in 2007<sup>6</sup>.

In some cases, while it may be true that there is no explicit contradiction between national legislation and the *letter* of the legal framework of the Convention, a doubt remains whether there is also no contradiction with the *spirit* of the Convention and its subsidiary texts – and the descriptions of recognition procedures at national or institutional level sometimes strengthen the doubt.

**The terminology issue.** One way in which the national practices diverge from the spirit of the Lisbon Recognition Convention is usage of outdated terminology linked to concepts that are not compatible with the principles of the Lisbon Recognition Convention.

It is at least not self-evident that a national legislation is in compliance with the Lisbon Recognition Convention legal framework if the legislation uses term *nostrification* - which is the case in at least five Bologna countries, or *equivalence* - which is the case in many more countries, especially those that have not made amendments to legislation concerning recognition after they joined the Lisbon Recognition Convention. Arguments are sometimes heard from those countries which use terms *equivalence* or even *nostrification* that in their national contexts those words mean the same as *recognition*.

In whatever meaning the terms may be used locally, in international context the words “nostrification” and “equivalence” have their connotations originating from the assessment procedures of the past (or are they rather still alive?) which were relevant under the old international conventions and agreements on recognition and which are not compatible with the Lisbon Recognition Convention.

For exactly that reason there is no mention of “nostrification” or “equivalence” neither in the Lisbon Recognition Convention itself nor in the supplementary legal documents adopted within the legal framework of the Lisbon Recognition Convention.

*Nostrification* is a term originating from recognition practices that were widely used several decades ago. Nostrification means acknowledgement of full identity of the foreign qualification in all of its aspects – and therefore nostrification often leads either to issuing the appropriate host country’s qualification or allowing use of the host country’s title.

*Equivalence* is a more recent term denoting a somewhat softer procedure than nostrification but is not the same as *recognition* in the terminology of the Lisbon Recognition Convention. The Explanatory Report to the Lisbon Recognition Convention provides an explanation why the word “equivalence” is not used in the Lisbon Recognition Convention<sup>7</sup>:

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<sup>6</sup> <http://www.ond.vlaanderen.be/hogeronderwijs/bologna/documents/WGR2007/Strategy-for-EHEA-in-global-setting.pdf>

<sup>7</sup> Explanatory Report to the Convention on the recognition of qualifications concerning higher education in the European region, Lisbon, 11 April 1997, [http://www.aic.lv/ace/ace\\_disk/Recognition/leg\\_aca/Lisb\\_exp.pdf](http://www.aic.lv/ace/ace_disk/Recognition/leg_aca/Lisb_exp.pdf)

*“Practices concerning the recognition of qualifications have developed considerably over the past decades. Whereas an assessment of foreign qualifications often entailed a detailed comparison of curricula and lists of material studied (“equivalence”), the emphasis has now shifted to a broader comparison of the qualifications earned (“recognition”). Likewise, a tendency has become apparent for formal international regulations to emphasize the procedures and criteria applicable to the process of recognition of foreign qualifications rather than to list or define degrees and diplomas that shall be recognized under the regulation.”*

Thus, as the Lisbon Recognition Convention was adopted in 1997, today it is ten years late to assess foreign qualifications by seeking equivalence ... but the terminology and as a result also the practice is still alive.

This observation is yet another indication that the national legislation should be amended after joining international treaties or otherwise application of the new approach in practice may be hindered. Terminology does matter: if terminology is used that actually denotes outdated procedures that do not ensure ‘fair recognition’ in the letter and spirit of the Lisbon Recognition Convention, the terminology should be changed.

It is therefore highly recommended that countries that have not done so yet adapt their terminology to the terms used in the Lisbon Recognition Convention rather than keep such kind of terminology which – at least in their international meaning - contradicts its principles.

**Summary on legislation review.** Quite a number of countries did not provide any timetable or details of organization of the review of national legislation. A significant number of countries state that their legislation is already in compliance with the Lisbon Recognition Convention (Lisbon Recognition Convention) even if it has not been amended after joining the Lisbon Recognition Convention. In reality, while there may be no explicit contradiction between national legislation and the *letter* of the Convention, there may be contradiction with the *spirit* of the Convention and its supplementary legal documents.

Some countries use outdated terminology which is linked to concepts that are not compatible with the principles of the Lisbon Recognition Convention. Thus, at least five countries still use term *nostrification* which is linked to a recognition concept seeking full identity of the foreign qualification, or the term *equivalence*. None of those terms is used in the Lisbon Recognition Convention or its subsidiary texts, because they are linked with the outdated principle where the main focus of assessment was on detailed comparison of curricula and even lists of material studied.

## **Legal and institutional autonomy issues in implementation of the Lisbon Recognition Convention**

It is interesting that this point arises and is being intensively discussed as theoretically there should be no problems at all. Since the Lisbon Recognition Convention is an international treaty, after a country becomes Party of the Convention, i.e. ratifies it, the Convention becomes superior to national legislation. In reality, however, the National Action Plans for Recognition demonstrate something else (and the same is often heard at international meetings where recognition is being discussed): the superiority of the international legislation over the national in practice does not work so smoothly in all countries. Two kinds of difficulties are mentioned most often. The first one is related to those cases where the national legislation contradicts with the legal framework of the Lisbon Recognition Convention. Most typically it may happen if the contradictory clauses have already existed in the national legislation before the country in question joined the Lisbon Recognition Convention. In those cases the natural solution should be to amend the national legislation accordingly to bring it in the line with the Lisbon Recognition Convention. There is a large group of countries that have done so or are planning to do so. However, there are also examples of the opposite – i.e. cases where national legislation has been amended or replaced with new generation legislation without respect to the international legislation – in which case the contradictions may become even deeper.

The other type of hindrances to the implementation of the Lisbon Recognition Convention seem to be linked to the interpretation (or rather misinterpretation) of institutional autonomy. The autonomy of higher education institutions certainly does not mean that the higher education institutions have the liberty to ignore the laws or international treaties signed by the State – and the Lisbon Recognition Convention is one. Still, where this type of interpretation takes place, the various formulations in National Action Plans have approximately the same overall meaning: since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles or procedures stipulated in the legal framework of the Lisbon Recognition Convention are followed. Such an answer shows that countries actually do not fulfil the requirements of the Lisbon Recognition Convention which obliges the central authorities of the state party of the Convention to take all possible steps to encourage the favourable consideration and application of the Convention provisions in higher education institutions<sup>8</sup>.

Several different approaches regarding the legal aspects of implementation of the Lisbon Recognition Convention in relation to national legislation and institutional autonomy have been observed.

**The most widespread approach** seems to be the one where the ENIC/NARIC centre assesses the foreign qualification and issue a statement, which is a recommendation to the autonomous higher education institutions. The universities indeed make their

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<sup>8</sup> Cf. Article II.1 of the Lisbon Recognition Convention

autonomous decisions upon recognition but, as being aware of the international legislation and relying upon the professionalism of their national ENIC/NARIC centre<sup>9</sup> they are expected to follow principles of the Lisbon Recognition Convention.

**A sample of unacceptable practice is the “hands off” approach** where it is considered that due to institutional autonomy it is not possible to request that higher education institutions follow the principles of the Lisbon Recognition Convention in their recognition practices. In a couple of cases this type of interpretation goes even further, claiming that state has even no right to ask information about the actual recognition practices inside higher education institutions or that even advising the higher education institutions upon recognition can be problematic because of autonomy.

**The ‘centralized’ approach** is used by some countries. There the actions and responsibilities are reversed. A central body: the Ministry, the Minister or another senior ministry official personally, a ministry-approved committee makes decisions upon recognition. Recognition decision may in this case be prepared either by the higher education institutions or ENIC/NARIC centres or ad-hoc committees. A couple of countries consider this type of approach as a solution to the autonomy issue. As an extreme case of this approach in one country higher education institutions have no mandate or say in recognition at all.

There are three interesting variations of the “most typical” approach described above. One of them involves some ‘power play’: autonomous higher education institutions take decisions but inspectorates, ministries or other bodies that monitor observation of law in higher education institutions follow the implementation of the Convention.

In the second variation of the ‘typical’ approach a legal solution is sought: the principles of the Lisbon Recognition Convention are transposed into the national legislation. While universities are autonomous, they still have to respect the law; therefore this approach ensures that the recognition decisions should be in line with the Lisbon Recognition Convention. This example, which is the case in several countries, clearly shows that international legislation is not always seen as superior to national one in practice – hence the described measures.

The third variation of the ‘typical’ approach seems to be the best practice. It is related to quality assurance: since fair recognition of qualifications is considered to be part of the overall quality assurance system of the higher education institution, the institutional recognition procedures and implementation of the Lisbon Recognition Convention is assessed at the periodic quality reviews, audits or accreditation.

**Summary on legal and autonomy-related implementation difficulties.** In some cases countries report problems to implement the Lisbon Recognition Convention because the

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<sup>9</sup> In the EU, EEA and EU candidate countries the recognition centres belong to both ENIC and NARIC networks. The reference to ENIC only is used here because in the Bologna process also covers countries outside the EU and the national recognition centres of such countries belong to ENIC network only.

national legislation contradicts with the legal framework of the Convention. This indicates that the country should either amend its legislation or ensure that the superiority of the international legislation is observed.

Some countries non-acceptably report that since the recognition decisions are taken by the higher education institutions and since these institutions are autonomous, the state cannot ensure that the principles of the Lisbon Recognition Convention are followed. Thus, these countries actually do not fulfil the requirements of the Lisbon Recognition Convention to take all possible steps to application of the Convention provisions in higher education institutions.

The best solution to this issue is making the recognition of qualifications in higher education institutions part of quality assurance which will then assess compliance with the Lisbon Recognition Convention. Another solution is that the state bodies that monitor observation of law in higher education institutions also monitor observation of the Lisbon Recognition Convention principles. A less favourable solution mentioned by some countries is that recognition decisions are made by a central body: the minister or somebody in his name and not by higher education institutions.

### **Examples of follow-up measures planned**

Not many countries are planning to amend or draft legislation. Following are some examples of countries planning to do so.

In Malta a process has been initiated so as to streamline and simplify legislation and this process will address both the academic and professional recognition. A working group established in 2006 for the review of legislation in Albania, has proposed amendments to two national regulations in order to ensure compliance with the Council of Europe/ UNESCO Recommendation on Criteria and Procedures. Armenia stated that it had no specific legislation on recognition so far therefore the Lisbon Recognition Convention is being applied directly in Armenia, but there are plans to adopt new legislation in the course of 2007-2008. In Latvia the legislation is in line with the principles of the Lisbon Recognition Convention but those principles so far are not explicitly mentioned. For this reason the principles of the Lisbon Recognition Convention are listed in the draft law for higher education which has been submitted for adoption. Bosnia and Herzegovina informs that due to different legislation in the different parts of the country and lack of a state level higher education law<sup>10</sup>, the procedures and criteria are not fully in compliance with Recommendation on Criteria and Procedures, and therefore the state level recommends sticking to the principles laid down in the international legislation.

In most countries the follow-up procedures planned are not involving amendments of legislation but rather information and dissemination measures.

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<sup>10</sup> A state level law on higher education has since been adopted in Bosnia and Herzegovina.

A number of countries, including those known for best recognition practices and therefore often sharing their experiences with others, indicate that different stakeholders involved in the assessment and recognition of qualifications still need more information on the principles of the Lisbon Recognition Convention. It is specifically underlined in several National Action Plans that training in practical application of the Convention principles is still needed and the ENIC/NARIC centres of these countries therefore plan more dissemination and training events for higher education institutions, employers and other parties involved in recognition.

Austria considers that its legislation is in compliance with the Lisbon Recognition Convention legal framework and plans to inform partners in the EHEA by publishing the new amendments and preparing English translations of the relevant legislation. So does Croatia where the amendments to legislation took effect at the end of 2006.

**Summary on follow-up measures.** In most countries the follow-up procedures planned are not involving amendments of legislation but rather information and dissemination measures.

### **1.3. Bilateral recognition agreements**

#### a. Conformity with the principles of the Lisbon Recognition Convention

Regarding the bilateral recognition agreements, the main findings are as follows. Far from all countries have bilateral recognition agreements with other countries. Where a country has such agreements, the number of agreements is usually three to four, although in some cases the number of agreements is greater, e.g. Germany, Czech Republic and Slovenia have more than ten bilateral agreements each, Romania has 8, Poland - 7, Slovak Republic and Albania – 5 bilateral agreements.

Bilateral recognition agreements are often concluded among geographically close countries or among countries with common history. Examples of this phenomenon are the agreement between the Nordic countries, one between the Baltic countries, at least part of the agreements concluded by such countries as e.g. Austria, Croatia, Czech Republic, Germany, Hungary, Italy, Liechtenstein, Romania, Slovakia, Switzerland and others. Russian Federation sees bilateral agreements as part of its plans to increase export of its higher education services. In the above cases the bilateral agreements usually go further than the Lisbon Recognition Convention: in some cases the agreements include notions on how particular qualifications of one party of the agreement should be recognised in other party (ies).

Another group of bilateral recognition agreements are those which provide legal grounds for mutual recognition with countries that are not part of the European region and are therefore not covered by the Lisbon Recognition Convention. Several 'Bologna' countries have concluded bilateral agreements with China, some with Latin American countries, Egypt, Kazakhstan, Kyrgyzstan, Iran, Uzbekistan, Turkmenistan and others.

## **Conformity of bilateral agreements with the principles of the Lisbon Recognition Convention**

Most countries state that their bilateral recognition agreements are in conformity with the principles of the Lisbon Recognition Convention. Yet, in several cases countries have indicated that bilateral agreements are becoming outdated and should therefore be revised – which may partly be caused by the rapid changes of qualifications systems within the Bologna process.

Austria notes that, as its policy is to support implementation of the Lisbon Recognition Convention in the countries involved in the Bologna Process, Austria is not planning to conclude further bilateral agreements with States parties to the Lisbon Recognition Convention. Instead, it is more useful to develop bilateral recommendations with these countries, working together with their relevant institutions and using the Convention as the only legal basis.

**Summary on bilateral agreements.** Not all countries have bilateral recognition agreements. The number of bilateral agreements is typically 5-10. Bilateral recognition agreements are often concluded either among geographically/ historically close countries or with countries that are not part of the European region and are therefore not covered by the Lisbon Recognition Convention.

It is worth considering the proposal not to conclude further bilateral agreements with States parties to the Lisbon Recognition Convention in order support implementation of the Lisbon Recognition Convention in the countries involved in the Bologna process.

## 2. Recognition practice

### 2.1. Recognition procedures and criteria

- a. *Overview of the practice of competent recognition authorities in applying the Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study<sup>11</sup>.*
- b. *Measures to improve implementation.*
- c. *Overview of the time required to process applications for recognition and measures to improve this time.*

#### Overview of the practice of competent recognition authorities

##### Recognition procedures

With a few exceptions, nearly all the countries declare that the recognition criteria and procedures they use are in compliance with the Council of Europe/UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications and Periods of Study (further Recommendation on Criteria and Procedures). Among the exceptions are Spain which does not claim compliance with the Recommendation on Criteria and Procedures and Bosnia and Herzegovina which informs that due to different legislation in the different parts of the country, the procedures and criteria are not fully in compliance with Recommendation on Criteria and Procedures and therefore the state level recommends to stick to the principles of laid down in international legislation. Some countries e.g. Bulgaria link their updating of the criteria for recognition with the latest developments within the Bologna Process.

**Authenticity and translations of documents.** While respecting that documents presented for recognition should be authentic and that fraud should be eradicated, practices in some countries still seem to be exaggerated. Requesting that all documents to be presented are officially translated and have 'apostille' is burdensome to the applicants but, on the other hand, a verbatim "official" translation may appear misleading from a recognition point of view. Albania, for instance therefore states that the confirmation of the authenticity can be realized through the direct correspondence of the institution of origin. In Hungary half the institutions do not require translations if the documents are in English or German, Italy recommends to institutions to accept documents in e.g. English, French, Latin and Spanish.

**Comparing qualification with the relevant host country's qualification.** With few exceptions the recognition procedures include comparing the foreign qualification in

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<sup>11</sup> Council of Europe/ UNESCO Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications adopted by the Lisbon Recognition Convention Committee at its second meeting, Rīga, 6 June 2001, [http://www.aic.lv/ace/ace\\_disk/Recognition/leg\\_aca/Recom.pdf](http://www.aic.lv/ace/ace_disk/Recognition/leg_aca/Recom.pdf)

question with the relevant qualification in the host country. It is not the case e.g. in France where so far foreign qualifications are not compared with the relevant French qualification. However, France is currently attempting to introduce such practice. Comparing a foreign qualification to the host country's qualification which it is going to substitute is a logical approach. However, it can create problems in those cases where there is no host country qualification to compare the foreign qualification in question with. Thus, one country stated that in case a relevant qualification to be used as a prototype cannot be found in the institution to which the application has been addressed and also in other institutions of the host country, recognition is refused. The applicant can then appeal and after appeal the Ministry of education should decide. While such cases might be relatively rare, it does not sound as a good practice because it actually means denying recognition without any assessment of the foreign qualification – and thus contradicts one of the main principles of the Lisbon Recognition Convention - applicants' right to fair assessment of his/her qualification. Spain has a procedure for recognising foreign higher education qualifications which provides a clear equivalent to Spanish academic degrees. Under the 2004 regulation it is possible to recognize a foreign degree also as a general degree in the Spanish system without comparing to a particular Spanish qualification.

Under the new recognition legislation the procedures in Slovenia have moved away from seeking that the foreign qualification is equivalent to the relevant home qualification in all aspects towards comparing only those aspects relevant to the right, which the holder of the qualification is trying to exercise in Slovenia.

The most detailed approach to comparison to a qualification in the host country's system is perhaps the UK case. The UK ENIC/NARIC has prepared a Code of Practice which advises on the criteria and procedures for the recognition of international qualifications and skills. The detailed procedure called "band framework" leads to location of the foreign qualification in the 17-level UK system comprising academic and vocational qualifications at all levels of education. A rather similar approach is used by Ireland where the foreign qualification is related to the Irish qualifications framework.

In Ukraine the foreign programme is compared to the domestic one in order to establish the level of correspondence according to the Ukrainian state standards and Cabinet regulation.

A very special way of comparing with host country's qualification is applied in one country where the recognition process involves a two-step assessment of the higher education institution and programme from where the foreign qualification in question originates as the following quote from the National Action Plan shows:

*"1. A review of the foreign higher education institution by a scientific committee of university professors to determine whether it is "essentially equivalent" to that country's higher education institutions.*

*2. An assessment of the particular Department and the program the student attended is made considering parameters such as admission requirements, number of*

*professors who are PhD holders, teaching and examination procedures and degree titles awarded.”*

Following these two steps, the academic qualifications are considered either as “equivalent” or as “equivalent and correspondent”.

Such a practice could be understandable some 10-15 years ago when the quality assurance systems in Europe were not yet established. Today quality assurance systems have been established in all the ‘Bologna’ area and countries are increasingly building trust between their educational systems on the basis of national quality assurance and the European cooperation in quality assurance through ENQA, ECA and other networks of quality assurances. For the above reasons attempting to assess quality of a foreign higher education institution from a distance (and probably using limited information) rather than consulting the national quality assurance results in the country that has issued the qualification doesn’t seem as an acceptable practice any more.

**Different recognition procedures for different types of qualifications?** In some countries there are separate avenues for different kinds of qualifications.

*Profile.* In some countries there may be different avenues of recognition depending on the profile of the qualification. In other words, there can be different competent authorities (and modified procedures) for ‘academic’ and ‘applied/professional’ qualifications.

*Level.* Some countries have established different avenues of recognition for different levels of degrees. First of all, some countries treat doctoral degree as a ‘scientific’ degree separately from the ‘academic’ bachelor and master degrees. Others treat the ‘postgraduate’ (doctoral and master degrees) separately from bachelor degrees.

Finally, some countries e.g. Cyprus, separate ‘Bologna’ degrees from ‘pre-Bologna’ integrated degrees awarded after completion of ‘long’ programmes, and has separate procedures for these two groups. In the French Community of Belgium, for instance, a concept of level equivalence with generic academic Bachelor and Master Degrees was introduced in 2004. This type of recognition is applied in those cases where the studies undertaken abroad have been at the Bachelor or Master level but their contents do not correspond to any programme in the French Community of Belgium.

An example of quite diverse procedures is Albania where, in addition to treating doctoral degrees separately from other qualifications there are different competent authorities looking at those cases where master degree has been obtained in the same field (and institution) which awarded bachelor degree, and those cases where master degree is in a different field or has been awarded by a different institution.

**Partial recognition.** In many countries in cases where full recognition cannot be granted because there are substantial differences, it is possible to have a partial recognition. As an alternative to partial recognition some countries mention compensatory measures suggested meeting requirements for recognition at the desired level. It is believed that granting partial recognition is a very common practice of most countries and probably

therefore countries did not see it necessary to specifically mention it in their National Action Plans. The possibilities of partial recognition/compensatory measures are specifically mentioned by e.g. Belgium (French Community), the Czech Republic and Latvia.

Is granting partial recognition good or bad practice? It is impossible to judge without seeing examples of cases. Of course, for the applicant partial recognition or imposing compensatory measures is better than non-recognition. However unlike the recognition of professional qualifications in the EU, where the EU Directive 2005/36/EC sets some regulations on application of compensatory measures, there are no international regulations for this issue in academic recognition. So the question that should be asked when compensatory measures or partial recognition is applied is: are those measures applied because some important learning outcomes of the foreign qualification were missing so that the applicant is not able to pursue the intended learning or professional activities; or are the measures applied to make the contents of studies that the foreign applicant has taken identical to the ones after which the relevant local qualification is awarded?

**Links between procedures of academic and professional recognition.** While not all countries mention it explicitly, there is a feeling that, as admitted by e.g. Estonia, Georgia, Greece, Sweden and other countries, academic recognition often has consequences in *de facto* professional recognition, i.e. the recognition for the non-regulated part of the labour market. Spain in turn reports that academic recognition is easier if the applicant already has professional recognition.

A rather strange finding is that some countries require full academic recognition (including comparison of programmes carried out by higher education institutions) when the applicant intends to enter a regulated profession. While the issue is outside the scope of the present report, it should be admitted that such developments are not in line with one of the general principles of the EU Directive on the recognition of professional qualifications— which is that a professional who had the full right to practice in the member state of origin should be given the same rights also in the host member state rather than go into detailed comparison of the academic content of training.

It is important to note that as far as possible the procedures of recognition for academic and professional purposes for the non-regulated part of the labour market should be coherent – first of all, for the sake of applicants. Having two sets of incompatible procedures also looks strange taken that majority ENIC/NARIC centres of the same time have functions in professional recognition – in the EU countries they usually serve as contact points for the professional recognition or, in other countries they may have various functions in professional recognition – from advisory bodies to competent authorities.

**Recognition in the cases when evidence is incomplete or lacking.** In those cases where evidence is lacking the assessment of applicant's qualifications is difficult and requires a good will. Nevertheless, there seems to be a growing number of countries that attempt to assess qualifications even in those cases. Denmark is one example of those countries where the ENIC/NARIC will assess applications from persons lacking evidence.

If the applicant cannot provide a transcript, but only has the diploma, the foreign qualification will only be compared with a general level of the Danish education system.

**Recognition procedure: in two stages. But which stages?**

It has become quite common that the overall procedure from the moment when holder of a foreign qualification submits application to the moment a decision upon recognition is taken includes two main stages. The National Action Plans demonstrate that these two stages can be quite different.

**Recommendation with a following decision upon recognition.** In many cases the first stage ends with issuing a statement upon recognition which is not yet a decision and is therefore not binding. The recognition statement then serves as a recommendation to the competent authority which takes the decision. In quite a number of countries the recommendation is issued by the ENIC/NARIC centre and the final recognition decision is taken by the higher education institutions (for further studies) or by employers (for employment in non-regulated professions).

There can be variations to the recommendation – decision two-stage procedure: in some countries it is an ad-hoc committee of experts (and a higher education institution in one country) and not the ENIC/NARIC centre that prepares the recommendation. The decision in some countries may be taken by the minister (vice-minister, ministry), in some others by an ad-hoc committee of experts, and in some countries by the ENIC/NARIC centre.

As it can be seen from the National Action Plans, the two-stage procedure can involve stages different from recommendation and decision and can vary substantially between countries. The various first and second stages of the two-stage procedure are summarized in table 1.

Table 1. Two-stage recognition procedure as described in the National Action Plans for Recognition submitted by different countries<sup>12</sup>

	Stage I	Stage II
A	Recommendation on recognition	Recognition decision
B	Formal recognition	Recognition for continuation of studies
C	Recognition of level	Recognition of comparability
D	Recognition positioning in the home system	Recognition statement establishing equivalence
E	Recognition for further studies	Establishing equivalence with issuing host country's degree
F	Establishing equivalence	Establishing comparability (with all legal rights)

Some differences from the “typical” recommendation- decision procedure A seem to be obvious.

In case B the first stage ends with a “formal recognition”. Thus, the result of the first stage is already a decision. This decision probably gives some rights to the holder, and is not a recommendatory statement as in the “typical” procedure.

In case C there are also two recognition decisions. The first one acknowledges the level of the foreign qualification without comparison to a particular host country's qualification and also may give some rights to the holder. With the introduction of the Bologna three-cycle system the “level recognition” without a detailed comparison to a particular qualification of the host country seems to become more widespread. In the second stage the foreign qualification may be recognised as comparable to a particular qualification of the host system. In principle the “formal” or “level” recognition may fit some of the needs of the qualification holder. However, taking into account that in some countries there is still a tendency to seek full identity of the foreign qualification to the relevant home qualification, the first stages in cases B and C may also be used to say politely “not recognised”. It should therefore be important with regard to cases B and C to clarify what is actually the function of the two different levels of recognition, what rights the first stage of recognition actually gives to the holder and how similar the qualification must be to the relevant host country's qualification to reach the kind of recognition foreseen in stage II.

In the cases D, E and F countries in their National Action Plans use term “equivalence” which has already been discussed in the section 1.2. *Review of national legislation relevant to recognition*.

<sup>12</sup> Names of stages taken from the National Plans submitted by countries

In the cases E and F the result of the first stage seems to correspond to the result of the stage II of the cases A, B C and D. Stage II of the cases E and F apparently is something even more. In the case E the second stage of recognition leads to issuing the host country's qualification.

Regarding the case F, *equivalence* is already established in the stage I but only in stage II the holder of a foreign qualification gains the full legal rights. In any case the fact that the equivalence in different countries may appear either as a result of the first and the second stage of the recognition procedures clearly demonstrates that the discussion should continue at European level to clarify the terminology used and the philosophy followed.

A conclusion from the above is that there should be a discussion on European level to clarify the terminology used and the stages of the recognition procedure with a view to agree upon coherent and mutually understandable procedures. Besides the representatives of the ENIC/NARIC centres the discussion should also involve policy makers and representatives of higher education institutions, as the national recognition procedures are often regulated in legislation and as the higher education institutions are often involved in the last stage of recognition.

### **Recognition criteria**

The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess teaching staff of an institution in another country.

Some examples of contemporary approaches will be described first.

*Take into account differences in the educational systems.* The Flemish Community of Belgium, "the former Yugoslav Republic of Macedonia" and several other countries admit that they acknowledge differences between educational systems and take them into account at assessment of foreign qualifications.

*Count on quality and trust QA in other countries.* It can be seen that one of the common tendencies is using quality as a criterion and trusting the quality assurance in the country of origin. It becomes a norm that quality assurance (resulting in national recognition) of the programme and/or institution from which the qualification originates is a necessary precondition at recognition of individual qualifications. This approach leads to a principle stated clearly by Austria: "rely on the recognition in the country of origin".

*Assess learning outcomes wherever possible.* Several countries e.g. Croatia, Denmark, Latvia, Malta, Norway and others emphasize that whenever possible, recognition is based upon comparison of learning outcomes, or competences. Even more, one country has stated that recognition can only be denied if there is clear evidence of substantial differences in learning outcomes. Some countries emphasize other elements of qualifications frameworks such as e.g. profile.

*Attempt to take into account prior learning.* Several countries e.g. Denmark, France, Norway, state that they attempt where possible to evaluate and take into account the prior learning or such learning for which the applicants lack documentary evidence.

*Take into account the previous recognition practice* of similar qualifications is explicitly mentioned by e.g. the Czech Republic, Italy, Lithuania, “the former Yugoslav Republic of Macedonia” etc. Countries like Denmark, Netherlands, Norway, Ireland, Malta, Sweden, and the United Kingdom have established databases on previous recognition decisions and more are planning to do so.

**The following criteria for recognition are most often mentioned:**

- the recognition or quality assurance/accreditation status of the institution/ qualification in the country of origin
- the level of the qualification
- the learning outcomes/ stipulated aims of the programme
- the contents of the curriculum
- the rights of the qualification holder in the home country
- the conditions for access to the programme,
- the length/ duration/ volume of the programme,
- the purposes for which the recognition is sought

There are also other criteria that are mentioned less frequently:

- the level of the institution
- the profile of the institution
- the number of study hours covered by the programme,
- the traineeships, practical exercises, dissertations and theses,
- the examination results obtained,
- the accreditation or recognition by the foreign authorities
- the professional recognition of the study programme in the home country
- the relevant professional experience

Some of those criteria raise further questions. It is not absolutely clear what the „level of the institution” means. It may be just an issue of wording, but it also might be related to putting a professional higher education institution at a different “level” compared to a university – while in fact both may award the same level qualifications. Using number of study hours covered by the programme as a recognition criterion seems an old-fashioned approach coming from those times when every detail of the programmes was compared.

*Summary on recognition criteria*

The criteria used and the relative importance of different criteria vary significantly from country to country. Criteria may vary from comparing learning outcomes to attempting to assess teaching staff of an institution in another country. The contemporary approaches include e.g.: taking into account differences in the educational systems, counting on

quality and trusting quality assurance in other countries, assessing learning outcomes wherever possible, attempting to take into account prior learning, taking into account the previous recognition practices in similar cases. Adding the purposes for which recognition is sought and study workload seems to make an up-to date approach to recognition.

However, a number of other countries start with mentioning such criteria as contents of the curriculum and length/duration of the programme instead which seems quite backward-looking approach.

### **Measures to improve implementation of criteria and procedures**

Not all countries plan any measures to improve recognition practices as a result of the legislation and procedures' review.

One country that is planning the greatest number of activities is Albania: it plans to reduce the number of the documents to be legalized, to ensure possibilities for applicants to appeal against the recognition decision and to improve the procedures for appeal, to reduce by half the fees for recognition and to further reduce of the time for the recognition (even if the time is in line with the Convention already). Poland states that it will prepare new rules of nostrification.

Many countries, including a number of those who are known for best recognition practices, plan to continue to disseminate information on recognition criteria and procedures among all stakeholders and to provide advice and training to the relevant staff of the higher education institutions as well as employers, i.e. to those who in most cases actually are the competent recognition authorities. Some countries admit that it is especially necessary for private institutions; some others have so far provided such information to universities only and are now planning to include also the applied higher education institutions.

Bulgaria, Croatia and others plan updating the criteria for recognition according to the latest developments in the Bologna Process and in the education field in general. Croatia also plans to eliminate requirements leading to undue complications in the procedure.

Several countries plan to establish databases of recognition decisions with a view to simplify procedures in future, while Ireland, Malta and some others will develop databases on qualifications systems abroad and further strengthen the ENIC/NARIC centre.

Some countries, e.g. Italy, Norway and others, plan monitoring the drawing up and implementation of institutional regulations with special reference to academic recognition and the application of the Lisbon Recognition Convention. Norway will also make it compulsory to include recognition procedures in the formal quality assurance system of all higher education institutions. Italy, which has stressed the importance to discuss substantial differences issue internationally, also plans an intensive national discussion on cases of substantial differences.

*Summary on improving the recognition practices.* Not all countries plan any measures to improve recognition practices as a result of the legislation and procedures' review. The main measures countries plan to improve procedures and criteria are: ensuring possibilities for applicants to appeal, dissemination of information on recognition criteria and procedures among all stakeholders, updating the criteria for recognition according to the latest developments in the Bologna Process, establish databases of recognition decisions, assisting higher education institutions and monitoring the drawing up and implementation of institutional regulations. It should be admitted that the same countries that already demonstrate the best recognition practices also plan most measures for improvement.

### **Overview of the time required to process applications for recognition and measures to improve this time**

The time required for recognition generally does not seem to be worrying. Quite a number of countries, among them Albania, the Flemish Community of Belgium, France, Italy, Poland and others mention the 3 months time limit.

There are also a number of countries that do it in substantially shorter time: Georgia - 15-30 days, Malta – not more than 15 working days, Iceland – 15 days (but that concerns procedures up to receiving ENIC/NARIC advice), Denmark - 26 days (and the time is still decreasing), Estonia – 30 days, Latvia – in most cases 15 days, in more complicated cases more but not exceeding 3 months (in theory, the law allows for 6 months, though), Czech Republic, Lithuania, Liechtenstein and Switzerland – usually not more than 1 month with extension up to 3 months if necessary, Norway – 2.6 months on average, Hungary and “the former Yugoslav Republic of Macedonia” – normally up to 2 months, in Hungary there is extension possible up to 3 months.

In Slovenia and Bosnia and Herzegovina the desired time for recognition theoretically is 2 months; however not in all cases (1/2 of qualifications in Slovenia) recognition decision is issued in this time yet. Cyprus and Sweden aim at 3 months, in Sweden 90% cases are completed in this time. The procedure still takes 4 months in Armenia.

*Summary on the time required for recognition.* Overall, it seems that in most cases the recognition procedures are within a three-month limit and that they are still shortening. It should however be noted that not all countries have answered the question regarding the duration of recognition procedures.

## **2.2. Joint degrees**

- a. Overview of the legal provisions concerning the recognition of joint degrees.
- b. Amendments to remove legal obstacles or to establish legal provision favouring the recognition of joint degrees.
- c. Beyond legal provision, suggestion of policy measures to ensure the recognition of joint degrees.
- d. Overview of double and multiple degrees and policy measures to encourage the recognition of such degrees.

It is evident from the National Action Plans for Recognition that within the last couple of years legislation has been reviewed in a number of countries with regard to awarding and recognition of joint degrees (JD). Since 2005 there has been a progress in establishing joint programmes and awarding joint degrees. In the two-year period between the Bergen and London ministerial conferences a number of countries changed their legislation with regard to joint degrees. Laws explicitly address joint degrees in e.g. Austria, Belgium, Czech Republic, Finland, France, Greece, Iceland, Ireland, Italy, Norway, Poland, Romania, Serbia, and Spain, making it possible to award and recognize joint degrees.

Another group of countries like Croatia, Cyprus, Denmark, Georgia, Germany, Liechtenstein, and Switzerland state that while the law does not specifically mention joint degrees, there are no legal obstacles for their establishment either. The previous experience with the joint degrees however tells<sup>13</sup> that no mention of joint degrees in the legislation does not necessarily mean that there are no legal obstacles to award them. Obstacles to joint degrees often rise from regulations that have been prepared without regard of joint degrees and not against joint degrees specifically (probably at times when joint degrees were not yet an issue). For instance, these can be regulations on the minimum part of the programme to be studied at the home institution, a requirement that final thesis has to be written at the 'home' institution, regulations on issuing state recognized diplomas (can a foreign rector/dean put a signature?), in some countries even officially approved layout of the state-recognized diplomas and many other seemingly simple formal issues.

Thus, e.g. in Latvia and in the Slovak Republic there are in principle no legal obstacles yet the law restricts the text to be written in the certificate, in Estonia joint programmes and award of joint diplomas is allowed, but the joint degrees awarded are not officially recognised by the state. In Latvia and Sweden it is legally possible to establish joint programmes but joint degrees are still impossible to award.

Some other countries e.g. Bulgaria, Cyprus, Malta, Slovenia inform that their legislation allows recognition of joint degrees but do not mention any legal possibilities to award joint

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<sup>13</sup> Tauch C., Rauhvargers A. Survey on master degrees and joint degrees in Europe, European University Association, Geneva-Brussels, 2002, 45 p.  
[http://www.aic.lv/ACE/ace\\_disk/Bologna/Reports/research/join\\_mas.pdf](http://www.aic.lv/ACE/ace_disk/Bologna/Reports/research/join_mas.pdf)

degrees, of them Bulgaria and Malta underline that universities are intensively establishing joint degree cooperation.

It seems that, like several years ago, some countries that have no possibility to award joint degrees use joint programmes as the way out – the programmes are established and carried out jointly but upon completion of studies each higher education institution awards its own degree to its ‘own’ students. It should also be admitted that countries in their NAPs often do not distinguish between the cooperation on joint programmes and awarding degrees jointly – and probably that is one of the reasons of optimism when stating that while the legislation does not mention joint degrees, they are still possible.

In several countries e.g. Austria, Denmark, Germany, Norway, Finland, Spain and others the ministry, rectors’ conference, ENIC-NARIC, or these organisations in cooperation have prepared guidelines for establishing joint programmes. Ireland and Norway have established procedures for joint quality assurance of the joint programmes.

It is specifically mentioned in National Action Plans that higher education institutions are encouraged to establish joint degrees in Austria, the Czech Republic, Denmark, Finland, France, Iceland, Italy, Norway, Poland, Sweden and Switzerland. Some of those countries also mention financial incentives: the Czech Republic, France and Italy for joint degrees in general but Switzerland specifically mentions incentives for joint doctoral programmes. The answers of countries on encouraging establishing joint degrees or financial incentives to joint degree cooperation, however, do not allow making any overall conclusions on these issues because there were no questions asked about encouraging or financial incentives to joint degrees in the template for NAPs.

There is also a group of countries that are preparing changes to legislation with a view to address joint degrees, among those are Bosnia and Herzegovina, Denmark, Liechtenstein, Latvia, “the former Yugoslav Republic of Macedonia” and others.

**Obstacles.** The most frequently mentioned obstacles to awarding and recognition of joint degrees are not new. They are:

- lack of national legal regulations on JDs;
- the text on the diploma is regulated by legislation and it excludes possibility to award degrees jointly,

Germany and several other countries underline the need for more international cooperation in quality assurance of joint programmes.

**The most typical conditions for recognition** of foreign joint degrees most often applied by the countries are actually those included in the Council of Europe/UNESCO Recommendation on the Recognition of Joint Degrees<sup>14</sup>:

- all parts of joint degree must have been subject to transparent quality assessment

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<sup>14</sup> Recommendation JD, 2005

- all participating higher education institutions should be recognised institutions,
- all parts of JD belong to a national educational system

Some countries also require that a similar programme exist in their country.

As a summary, there has been a progress in the area of establishing joint programmes and awarding joint degrees since 2005. In the two-year period between the Bergen and London ministerial conferences a number of countries have changed their legislation with regard to joint degrees; others have started joint programmes in practice. The resulting situation is that in most countries either the awarding and recognition of joint degrees is explicitly allowed and encouraged by national legislation, or there is no explicit mention of joint degrees in the legislation but the legislation does not hinder the establishment of at least joint programmes.

### **2.3. Overview of institutional practice**

Consider what measures have been or should be taken to allow national authorities to know

- a. whether higher education institutions and other competent recognition authorities comply with the Lisbon Recognition Convention and with national laws;
- b. what measures could be taken if given institutions or authorities were shown consistently not to apply the Convention and/or relevant national laws.

This section of the National Action Plans belongs to the least informative ones: several countries just inform that they do not have any information on institutional practices, sometimes mentioning institutional autonomy as a reason (e.g. Albania); to the contrary, in Slovenia the ENIC/NARIC keeps records of all the recognition statements. In the French and Flemish communities of Belgium as well as in France no information on institutional practices is available yet. Many countries only describe the measures that the ENIC/NARIC centre takes in order to assist institutions (websites, databases, seminars, hotlines etc.). Austria relies on counselling the institutions and authorities and not on convincing them by legal remedies. Turkey has no information on this point because higher education institutions have no mandate or competence for the recognition of foreign higher education qualifications, Ukraine because institutions are involved under coordination of ministry and in the cases if ministry considers that institutional level involvement is needed. In some more countries, e.g. in Romania and Spain, institutions only deal with recognition of credits, in Bulgaria higher education institutions do not decide upon recognition either, same goes for Croatia, but in the latter the ENIC/NARIC will in future no longer be responsible for final decisions.

Just a few countries e.g. Czech Republic, Denmark, Hungary, Latvia, Norway, Poland have actually carried out institutional reviews. However, even those countries that have commended surveys do not always disclose the findings but rather state that there will be actions taken to improve the situation/ assist the institutions on the basis of the results (e.g. Hungary, Poland).

In the Czech Republic, according to its statement, higher education institutions act in line with the basic steps proposed in the Recommendation. In Denmark, Estonia, Malta, the Slovak Republic and Sweden where the Lisbon Recognition Convention and its subsidiary texts are embedded into the national legislation, the appropriate instances can and do follow whether the higher education institutions stick to the legal regulations – including the Lisbon Recognition Convention and its supplementary texts. For instance, in Estonia it is done by the Ministry and in Sweden by the National Agency of Higher Education. In Iceland the cases of non-compliance with the Lisbon Recognition Convention legal framework would be reported in the accreditation report and the higher education institution in question will be given certain time limit to correct its procedures.

Ireland has experienced a large growth in immigration; therefore the issue of recognition of foreign qualifications has become a much more prominent and pressing one for higher education institutions. Recognition procedures in institutions have become quite formalised, standardised and well documented, with institutions applying common procedures and processes in recognising foreign qualifications.

In Switzerland, with its positioning of the ENIC/NARIC within the Rectors' Conference, higher education institutions and recognition authorities collaborate very closely. The recognition bodies meet regularly to discuss their recognition practices. Together with the Swiss ENIC/NARIC the CRUS Commission for Admission and Equivalence supports and monitors the implementation of the Convention and discusses arising problems.

The United Kingdom states that there is no evidence to suggest that individual institutions are in breach of Convention requirements. Under the Lisbon Recognition Convention, responsibility for demonstrating that an application to an institution does not meet the requirements for further higher education study lies with the institution.

In Latvia the survey has demonstrated that in most cases there are no problems to recognise foreign qualifications on the basis of the current legislation. According to views of higher education institutions, recognition is in line with the Lisbon Recognition Convention and national legislation. At the same time only some of the higher education institutions have adopted internal documents on recognition practices based upon national legislation. Higher education institutions also stressed a problem of lacking information and skills for credit transfer on equal level.

In Denmark the survey demonstrated that higher education institutions follow Cirius (the Danish ENIC/NARIC) guidelines, that many institutions have common standards, and that they use the Cirius hotline. The survey has also yielded a number of suggestions for further improvements.

In Norway all phases of the recognition procedure at higher education institutions are described in detail and are a part of the internal quality assurance system. The Norwegian survey has demonstrated that most of the higher education institutions have written procedures, only a minority have routines to detect possible mistakes or routinely send receipts to confirm reception of applications, a few routinely inform applicants about the

expected time needed to process, some are actively working on measures to reduce the time. In the survey, the higher education institutions were also asked to estimate their own degree of implementation of the Lisbon Recognition Convention on a scale from 1 (low) to 5 (high). Half of the higher education institutions responded gave themselves score 4, 15% reported full implementation (score 5), six scored 3 and one claimed to have score 1. Norway sees as most effective measures inclusion of the use of the Criteria and Procedures in the higher education institutions' system for quality assurance.

**Institutional practices in recognition of credits/ study periods.** Very few countries have mentioned the recognition of credits in their National Action Plans. In most cases the section on institutional practices just generally describes the implementation of the national and international legislation or organisation of recognition at higher education institutions but the section of ECTS in turn is devoted to implementation of ECTS credits in own programmes.

The limited number of answers show that the decision on recognition of credits/ study periods is usually taken by the higher education institutions (e.g. Czech Republic, Hungary, Iceland, Latvia, Lithuania, Romania and since 2002 France), or higher education institutions upon advice of the ENIC/NARIC centre (Estonia, Denmark, Sweden). A more peculiar situation is in Spain where universities are entitled to recognise periods of university studies abroad while periods of foreign non-university studies are recognised by the Ministry of Education, and in Germany where in those cases where programme concludes with "state examinations," credits are recognised by examination authorities of the *Land*.

The procedures for recognition of study periods/ credits vary. While Sweden claims that in recent years recognition of study periods is based upon existence or non-existence of substantial differences in the learning outcomes rather than on differences in detailed content, Denmark admits that it could not be clarified, whether the institutions look for full compliance with their own curricula, but Germany informs that laws on higher education stipulate that equivalence must be determined in order to recognize course credits earned abroad and that detailed information on equivalency determination is given in the framework examination regulations. In Latvia higher education institutions admit that they have too little experience and should have more information in order to carry out fair recognition of credits earned abroad. Denmark and Romania admit that in the case of exchange agreement with a foreign institution the recognition of study periods can be automatic and with full credit. Denmark underlines the importance of the existence of appeal procedures and informs that it has also amended legislation so that Danish students are given the same opportunities of appealing credit transfer decisions, which has been possible for persons with foreign degrees or study periods.

As a short summary, even from the limited number of responses it can be seen that while some countries tend to compare learning outcomes of the foreign and home study periods, others may apply detailed comparison of contents/ equivalence procedures to study periods thus reducing the chances of credit transfer. As the automatic recognition of study periods in those cases where there was a mobility agreement with the foreign

institution is mentioned by just a couple of countries, there is no evidence that such practice is widespread.

### **Credit recognition and recognition of prior learning**

The Template for National Action Plans did not explicitly request description of practices for recognition of prior learning and for this reason no overall conclusions can be made: just three countries: Denmark, Italy and Slovenia have mentioned recognition of prior learning but there are definitely more countries that allocate credits for prior learning. The three above countries have mentioned very interesting and important issues and therefore it's worth mentioning practices of each of them.

Denmark has a policy on recognition of such foreign degrees where a part of credits towards the degree has been allocated in the country of origin on the basis of recognition of prior learning, the Danish ENIC/NARIC does not question credit transfer decisions of a publicly recognised/accredited foreign institution.

In Italy recognition of prior learning is possible since 1999 and it is used to recognize language and computer skills acquired in alternative ways, credits or certificates from postsecondary educational activities and, upon agreements between universities and professional associations – certificates issued by these associations upon completing education and training activities. It is not evident however that the same is possible with regard to recognition of prior learning acquired outside Italy.

Slovenia tackles a particular case related to transnational education: it mentions that in these cases where the transnationally operating institution or programme as a whole is not recognized, credits could be recognized for the purpose for further education at the Slovenian higher education institutions through the mechanisms of recognition of prior or informal learning.

## **2.4. Transparency tools for recognition**

- a. Plans and timetable for the implementation of the European Credit Transfer and Accumulation System (ECTS)
- b. Plans and timetable for the implementation of the Diploma Supplement
- c. Plans and timetable for the implementation of possible other transparency tools.

### **The Joint European Diploma Supplement**

The National Action Plans show that there has been a substantial progress in the implementation of the Joint European Diploma Supplement (DS): in 2007 in more than half the countries all graduates receive DS automatically; free of charge and in a widely spoken language. If countries that issue a DS upon request are also included, 2007 graduates receive Diploma Supplements in two-thirds of the countries. It should

nevertheless be recalled that in the Berlin Communiqué (2003), Ministers set the objective that every graduating student receive the Diploma Supplement automatically, free of charge and in a widely spoken language by 2005. The National Action Plans show that even at the end of 2006, half of the Bologna member states had yet to comply with the Ministers' commitment.

One further observation is that while some countries consider it natural to issue Diploma Supplements to graduates of doctoral programmes, others seem not to consider doctoral students.

A less positive observation is that a couple of countries issue a DS to graduates with a bachelor's degree only upon request - such a practice seems to reflect the national understanding of a bachelor's degree as just an intermediate qualification rather than as a higher education qualification in its own right.

Most countries have made issuing of Diploma Supplements compulsory and in many of them the compulsory issuing of DS started in between 2002 and 2005. In Spain the legislation on Diploma Supplements was adopted in 2003 but, as it is very recent, a statistically significant number of DS have not yet been issued.

The Flemish Community of Belgium, the Czech Republic, Latvia and some others have started implementation of Diploma Supplements immediately after the EU/CoE/UNESCO Diploma Supplement format was adopted but issuing of Diploma Supplements has been officially made compulsory at a later stage (e.g. 2002 in Latvia and 2005 in the Czech Republic).

There are several countries that seem to apply Diploma Supplement to the graduates of the "new style" bachelor and master degrees but do not issue DS to graduates from the "old style" long one-tier study programmes. Thus, in Germany in 2006 the Diploma Supplement was awarded in 63 per cent of Bachelor degree courses and in 55 per cent of Master degree courses, in Switzerland it was 100% of bachelor and master degree holders but just part of Swiss higher education institutions issued Diploma Supplements to graduates of long programmes, compulsory issuing of DS concerns only the bachelor and master graduates also in Hungary.

However, in some other countries, e.g. Austria, Cyprus and the UK, higher education institutions do not have an official obligation to issue Diploma Supplements.

While the guidelines for implementation of Diploma Supplements strongly recommend not producing customized versions of Diploma Supplements, some countries mention that they have created national versions of the Diploma Supplement. As there is no further information given in the National Action Plans of those countries, it is not clear if the "national" diploma supplements are fully following the EU/CoE/UNESCO Diploma Supplement format and just the relevant national information is added in e.g. points 6 and 8 of the Diploma Supplement (i.e. additional information and description of the national

higher education system) or has the “national” Diploma Supplement been further customized.

**The languages of the Diploma Supplements.** Most of those countries that have mentioned the language aspect inform that the Diploma Supplements are issued in the national language and in a widely spoken European language, some issue them in the national language and in one of the official languages of the European Union, in another group of countries the other language of Diploma Supplement is always English. There are, however, a couple of countries that offer Diploma Supplements in the native language while one in a widely spoken European language are offered on request. In Hungary, where appropriate, Diploma Supplement upon request is also available in minority languages.

**Plans to introduce Diploma Supplements after the time when National Action Plans were compiled.** In Armenia it was planned to introduce the DS in 2007, in Italy it was to become legally binding as of 2007. In “the former Yugoslav Republic of Macedonia” the first students will receive the Diploma Supplement in the academic year 2008-2009, In United Kingdom a Steering Group on Measuring and Recording Student Achievement was considering how to support Diploma Supplement and was expected to make its recommendations in March 2007.

**Summary on Diploma Supplement.** Many countries have made issuing of Diploma Supplements compulsory between 2002 and 2005. In 2007 in more than half the countries all graduates receive DS automatically; free of charge and in a widely spoken language. If countries that issue a DS upon request are also included, 2007 graduates receive Diploma Supplements in two-thirds of the countries. There are however several countries that seem to apply Diploma Supplement to the graduates of the “new style” bachelor and master degrees but do not issue DS to graduates from the “old style” long one-tier study programmes.

Some countries have created national versions of Diploma Supplement but it is not clear from the NAPs if the “national” diploma supplements are fully following the EU/CoE/UNESCO Diploma Supplement format and how much they are customized.

Most countries issue the Diploma Supplement in both the national language and a widely spoken European language (most often English), but there are also countries where the one in a widely spoken European language is available only on request.

### **Implementation of the European Credit Transfer and Accumulation System**

As regards the European Credit Transfer and Accumulation System (ECTS), more than half of the countries inform that they have implemented ECTS for both credit transfer and accumulation. While quantifying student workload and linking all courses of the programme with a certain number of credits is already an important tool for curriculum

development, the full effect of implementing a credit systems is yet to be achieved through formulating learning outcomes both for the programme as a whole and for each course and a consequent linking credits with learning outcomes. This will facilitate adequate recognition of study periods, credit allocation for lifelong learning, as well as provide a basis for dialogue among higher education institutions, employers and students on curricular matters.

It is quite difficult to formulate what does it actually mean if a country claims having “implemented ECTS”. The learning outcomes aspect appeared relatively recently and there are not so many countries that have actually re-worked their study programmes linking each course with learning outcomes. As well, “implementation of ECTS” does not always mean national implementation of the ECTS grading scale.

Thus, the feeling is that a statement that a country has implemented ECTS currently means limited implementation where:

- the country has implemented a workload-based credit system used for both transfer and accumulation and
- the workload is measured on the basis of assumption that yearly workload of a full-time student is calculated as 60 credits.

Thus, using the above understanding of what “full implementation” of ECTS currently means countries could be divided into the following groups:

- ✓ countries that have implemented **ECTS** as a transfer and accumulation system **in the whole higher education system**,
- ✓ countries that have implemented workload based **ECTS- compatible national credit systems** across the whole higher education system,
- ✓ countries that are implementing **ECTS** but so far have done so only **in part of higher education system**,
- ✓ countries that are **preparing for implementation** of ECTS
- ✓ countries that have credit systems **not compatible with ECTS**.

**ECTS as a transfer and accumulation system introduced in the whole higher education system.** According to the National Action Plans, ECTS has been fully or nearly fully implemented in a number of countries, e.g. Albania, Austria, Belgium, Croatia, Denmark, Iceland, Hungary, Liechtenstein, Malta, Poland, Romania, Serbia, Slovenia, “the former Yugoslav Republic of Macedonia” and possibly more countries have started. Denmark and Iceland state that they focus on proper use of ECTS meaning that credits are linked to learning outcomes and plan to ensure it through quality assurance procedures and the same seems to be the case in Finland. Some of those countries e.g. Iceland and Malta have had workload-based credit systems since decades, others e.g. have started implementation of ECTS as a transfer system in 1990s and changed it to an accumulation system recently, others e.g. Albania, Croatia, Poland and Serbia have started just a couple of years ago. Several countries of this group indicate that there are some particular types of institutions that are not obliged to use ECTS (Denmark), that there are still implementation difficulties (“the former Yugoslav Republic of Macedonia”,

Albania). The French Community of Belgium admits that while credit system is fully introduced, study year still remains the main benchmark.

**ECTS-compatible national credit system implemented in the whole higher education.** The countries mentioned below have fully implemented credit systems and some of them have done so a decade or even several decades ago. Such countries are e.g. Estonia, Finland, Italy, Latvia, Lithuania, Norway, Sweden, and Slovakia.

Some of the above countries e.g. Finland, Norway, Italy even apply 60 credits as the measure of yearly workload but because of other differences in their NAPs still regard their own credit systems “compatible” and do not claim using ECTS itself.

Others like Estonia, Latvia and Lithuania are planning to switch their national is something lacking here?. Estonia where ECTS - compatible credit system has been used for about a decade, honestly states that it will have properly implemented ECTS in the academic year 2009/2010 because rearranging of programmes linking them with learning outcomes takes time. Lithuania and Sweden planned to use ECTS as of 2007, in Latvia draft Law stipulates switch to ECTS but there are delays in adoption of law.

Ireland and the UK might also have ECTS-compatible credit systems but the relevant information is missing in the NAPs. UK also states that it has reservations towards ECTS and is negotiating with the EU Commission about amendments to ECTS itself. It seems that the reasons of using national ECTS-compatible systems are sometimes in the ECTS itself: some countries wanted a somewhat clearer definition of what one ECTS credit means, considering the 25-30 student workload hours a somewhat blurred definition), others wanted to keep national grading scale rather than to apply ECTS one.

**ECTS is implemented but only in part of the higher education system.** There are a number of countries that are implementing ECTS but not yet for all higher education. This may have different reasons: in Cyprus, the Czech Republic (also other credit system may be applied) and France the use of ECTS is recommended but not required by legislation so higher education institutions apply it voluntarily and not yet everywhere. Some countries have made implementation of ECTS compulsory only to the Bologna two-cycle programmes but not for the remaining long single-stage study programmes. This is certainly the case in Germany and might also be the reason why the ECTS applies to 48% of the total student population at the Universities and 30% of the student population at the Universities of Applied Sciences in Switzerland

**Just preparing to implement ECTS.** Some countries, e.g. Armenia, Georgia and Spain, note that they are preparing to implement ECTS and list different measures of preparation. Armenia planned to have guidelines for ECTS in 2007, Georgia in 2008 and Spain in 2008/2009 academic year.

**National systems not compatible with ECTS.** There are two countries – Spain and Turkey - where the national credit systems are based on contact hours. Spain plans to introduce ECTS in the whole higher education system in the 2008/2009 academic year and both use ECTS credits for international student exchange.

**A summary on implementation of ECTS.** While the implementation of ECTS as a credit transfer and accumulation system is indeed progressing, there are a number of issues to be noted:

- ✓ In quite a number of countries credit systems are used for both transfer and accumulation,
- ✓ Not all countries however use ECTS itself; there are still a number of cases where ECTS-compatible national credit system is used.
- ✓ ECTS key features should be further discussed and fine-tuned so that all countries can adhere to the definitions therein,
- ✓ There are some countries where credit system is implemented but it does not yet apply to all higher education.
- ✓ In most countries implementation of ECTS so far has not concerned linking credits with learning outcomes. There is a growing understanding that linking credits with learning outcomes is an important component of the credit system, however implementation of this feature of ECTS will still take time.
- ✓ A good practice seems to be using quality assurance as a tool for implementation of ECTS, i.e. setting implementation of ECTS as a quality requirement.

## ***2.5. Borderless/transnational education***

- a. National and/or institutional policies concerning the assessment of borderless/transnational education.

The answers regarding the borderless/transnational education demonstrate that the attitude towards borderless education has changed. While being aware of the difficulties that borderless education may also bring, countries tend to take care that the procedures and requirements applied do not exclude borderless education. Thus, e.g. the Czech Republic and the Slovak Republic state in their National Action Plans that the aim should be to avoid discrimination of high-quality institutions and that recognition of transnational education should not be rejected due to formal reasons.

A number of countries, e.g. Croatia, Estonia, Iceland and others underline the importance of the Code of Good Practice in the Provision of Transnational Education and the UNESCO/OECD Guidelines for Quality provision in Borderless Education, some of them e.g. the Flemish Community of Belgium, Hungary, Italy, Norway, Slovenia, Ukraine have adopted the principles into their national legislation (or ENIC/NARIC guidelines in the case of UK), Code of Good Practice has been consulted when drafting legislation in Serbia. However, some other countries admit that their procedures for accreditation and the recognition of qualifications are still not geared to addressing cross-border provision. In e.g. Austria, French community of Belgium, Georgia and Denmark (where legislation was in the drafting stage at the time of submitting the National Action Plan) there is no specific legislation concerning transnational/borderless education, Bosnia and Herzegovina and Iceland state that they do not have a specific policy on transnational/borderless education.

Most countries link recognition of borderless education to compliance of the provider with the national legislation of both the sending and receiving country, information provision and quality assurance. Several countries, e.g. Belgium (French Community), Denmark, Italy, Latvia, Liechtenstein, Lithuania, Malta, the Slovak Republic and Switzerland link recognition of cross-border qualifications to accreditation or official recognition of the institution/programme in the receiving country. Finland admits that while in the case of academic recognition and *de facto* professional recognition the recognition of transnational qualification is decision of higher education institutions or employers respectively, in the case of *de jure* professional recognition in regulated professions the qualification has to be officially recognized in the country of origin.

The following kinds of requirements for recognition of cross-border qualifications are mentioned in National Action Plans for Recognition of different countries:

- awarding institution<sup>15</sup> and/or the programme is recognized/accredited in the sending country. In Denmark, for instance, accreditation in the sending country may imply the right to establish Danish-accredited cross-border education.
- the cross – border institution or programme is accredited/recognised in the receiving country, e.g. Italy, provided that there have been adequate QA arrangements in place – Ireland,  
Some countries apply both of the above requirements, e.g. the French Community of Belgium, Latvia, Liechtenstein, Sweden and some others stress that a condition for recognition of cross border qualifications is that the transnationally provided programme should be accredited/recognized separately from the ones offered by the awarding institution in the sending country,
- cross-border education should comply with the legislation of the receiving country. E.g. in Czech Republic compliance with the legislation may result in accreditation of the cross – border education in the receiving country,
- the same or essentially similar programme should be provided by the awarding institution in the sending country - e.g. Sweden.

As regards the international higher education institutions that do not belong to any national education system, some countries admit in their National Action Plans for Recognition that degrees awarded by such international institutions are considered for recognition if they are recognised in the country where the programme is provided. In Slovenia, in those cases where the transnationally earned qualification as a whole is not recognised, credits could be recognized for the recognition for the purpose for further education through the mechanisms of recognition of prior or informal learning.

Denmark has indicated an issue that may well be the case in more countries: in Denmark the borderless education providers are treated like other private higher education institutions that exist outside the formal public system, which means that they cannot offer

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<sup>15</sup> Here and further the definitions from the Revised Code of Good Practice in the Provision of Transnational Education. Adopted by the Lisbon Recognition Convention Committee in Riga 2001 revised version adopted by the Lisbon Recognition Convention Committee at its 4th Session (Bucharest, 2007), [http://www.aic.lv/ace/ace\\_disk/Recognition/leg\\_aca/Code\\_TE\\_rev2007.pdf](http://www.aic.lv/ace/ace_disk/Recognition/leg_aca/Code_TE_rev2007.pdf)

Danish national degrees. As regards Danish higher education institutions they do not have the possibility of delivering nationally recognised degrees outside Denmark.

In Russia export of Russian education is considered a very important issue and therefore the *Gosudarstvennaya Duma* has adopted a plan of measures to stimulate it.

In Turkey transnational qualifications are not recognised. In Bulgaria transnational institutions were allowed but not recognized. As of the accession of Bulgaria to the EU, higher schools officially recognized by the EU member states, EEA and Switzerland can open their affiliates in Bulgaria under the condition that they adhere to the regulations of the Higher Education Act.

While Georgia says there is no transnational education on its territory yet and Slovenia says it has little, Malta has considerable number of licensed private providers of courses leading to foreign qualifications, but Cyprus reports serious difficulties in connection with transnational degrees, because the transnationally earned qualifications often include a high number of credits based on work experience or huge parts of not all education has taken place through e-learning. According to the Cyprus NAP the assessment of transnational qualifications may therefore take more time than recommended in the Lisbon Recognition Convention, especially in the cases of transnational distance learning qualifications.

While some countries express their good will to give green light to *bona fide* transnational/ borderless education, countries also express concerns about possibilities to access information on quality of transnational education, possibilities to check whether the transnational e-learning has been properly assessed and whether allocation of credits for work experience has been properly done. These issues have often been discussed but proper solutions are yet to come.

## 3. Information provision

### 3.1 Provision of information on recognition

- a. Measures taken or envisaged to improve the provision of information on recognition criteria and procedures and on the national education system;
- b. The timetable envisaged for such measures;
- c. The bodies or institutions responsible for the measures;
- d. The state of electronic provision of information on recognition;
- e. Whether the national information centres establish and maintain their own web pages, linked to the ENIC-NARIC Web site.

### 3.2. Information package for applicants

- a. The extent to which information packages are provided for applicants by higher education institutions and other competent recognition authorities and,
- b. If needed, how practice could be improved.

It is important to note that most countries have not distinguished between points 3.1 and 3.2 in their National Action Plans. The answers are often unclear and represent a mix of description of how countries provide information on their own educational systems and how they provide recognition-related information to holders of foreign qualifications applying for recognition.

Most countries have mentioned their ENIC/NARIC as the main disseminator of information packages for applicants. Some countries have mentioned the respective Ministry of Education or its division responsible for the academic recognition or the higher education institution.

The level of support to the applicants for recognition differs from country to country. There are countries with high level of service that aside from information package provide applicants with feedback on the status of their applications. The French Community of Belgium offers online status check possibility on their website<sup>16</sup>. In Denmark the applicants are notified in case processing time of the application has been prolonged of the case. Denmark is planning a user survey to receive information on how the existing system can be improved; Sweden has stressed the need for more active information measures at the higher education institutions in their follow-up study of 2004. Germany is currently developing standards of assistance in recognition procedures.

The service level of some other countries is more passive. Some of the respondents declare providing the very basic information needed for starting the application process –

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<sup>16</sup> <http://www.equivalences.cfwb.be/dossier.asp>, site in French only

just the list of documents necessary for the recognition of qualifications and the special application form. This is less applicant-friendly and ineffective in case the applicant needs more standardized information. There are cases where information is provided only by means of posting it in the building of the recognition authority, which can make the information rather inaccessible to applicants. The applicants can become well served not only by counselling in person, per telephone, but also by conducting individual research on the website (where the information also should be organized in an accessible manner), receiving the documents needed upon request by email or standard mail. Provision of information in paper form only (Armenia) may mean longer processing time altogether.

Most often the criteria and procedures of assessment and recognition of foreign qualifications are regulated at national level, prepared in the majority of cases by the ENIC/NARIC or the respective ministry. The recognition authorities have to follow the standard criteria and procedures, but usually there is no national level regulation on standardised information packages.

Estonia, Denmark, Iceland and others state that experience based standardised information package or list of documents have been elaborated and contain at its best the information on:

- 1) who may apply
- 2) guidelines on how to fill in the application
- 3) purpose of recognition
- 4) documents required
- 5) assessment procedure, including the role of the recognition authority, other assessment agencies and higher education institutions (who takes the decision, how binding this decision is)
- 6) object and criteria of the assessment
- 7) processing fees
- 8) time for processing
- 9) outcome of the assessment
- 10) status of assessment
- 11) conditions and procedures for appealing against a recognition decision, according to national legislation, rights regarding recognition
- 12) final clauses
- 13) contact data
- 14) additional information (government decrees on recognition – full text, reference to the national laws and international conventions and agreements which may be relevant to the assessment of foreign qualifications)

Such standardized information is available on the website, as printed materials (brochure) in the national language.

In some countries not all information on recognition is available online yet. Albania plans to link the recognition authorities responsible for recognizing foreign masters' degrees and foreign PhDs to the ENIC/NARIC website by the end of 2007. While the recognition of different cycle diplomas in Albania is dispersed among different recognition authorities,

the French Community of Belgium in its turn plans to create a one-stop office dealing with all demands for the recognition of diplomas from secondary and higher education, believing that this would allow applicants to be guided more efficiently. Several countries have a single e-mail address where questions concerning recognition can be sent.

In the good examples the information is available in both electronic and printed form in a number of locations e.g. on the website and programme prospectus of the higher education institution and the websites of various state bodies and agencies (stakeholders) etc. Higher education institution is usually the first stop for the applicants; therefore Albania is planning to link the website of the recognition authority to the higher education institution websites.

Even if the information is provided, one has to make it accessible to the audience: both local and foreign. Denmark and Hungary not only provide information to the local audience, but also take a step further ensuring that the information available to Danish speaking audience is understandable and does not contain specific terms, obvious only to specialists.

It can be noted that in several countries the recognition information is provided in the national language only. Without information available in widely spoken European languages the content of the websites is not easily accessible to speakers of other languages.

Some countries admit that, if the main information on recognition is available and accessible (easy to find, no language barrier) on the website of the ENIC, then higher education institutions might only provide the entry requirements for each programme and information of the ENIC/NARIC in the programme prospectus of each higher education institution. In Poland the higher education institutions, provide all information on their own. The respective responsible party having published the information is usually in charge of updating the information. In Germany the information is provided by many stakeholders and it could be reviewed whether the requirements and process of assessment and recognition procedures can be presented more concisely.

In Hungary the Recognition Application form and relevant information on recognition is available on the ENIC/NARIC website, but due to the great variation in foreign applicant numbers at the higher education institutions – the level of support varies from standard information accessible already at the website of the higher education institution to answers given on phone upon request. It is recommended that higher education institutions with a significant number of applications provide essential information on their academic recognition procedure on their websites as well. Armenia is even planning to introduce the possibility to apply for the recognition online.

Several countries e.g. Belgium, Sweden are currently conducting a research on how to improve the recognition process in the country. Ireland is reorganizing the website in a more user friendly manner.

In “the former Yugoslav Republic of Macedonia”, the ENIC/NARIC is highly involved in creating and improving the legislative framework, while the assessment of foreign qualifications itself is delegated to the higher education institutions, whose recognition decisions are then monitored and examined by the Information centre and then approved. An interesting observation is that, like with some other issues, those countries that already provide good information are also the ones planning further improvements.

Just a few countries mention information provision on their educational systems at all. This is symptomatic and links to fulfilling the obligations the Parties have undertaken when they have ratified the Lisbon Recognition Convention. Provision of information regarding own educational system is of high importance for the credential evaluators in other countries. It is very helpful on condition that it is specifically targeted at credential evaluators and contains concentrated information on the types of institutions, programmes and qualifications, quality assurance, recently also the qualifications frameworks etc. Some countries in their NAPs have mentioned that the function of information provision on their education systems abroad is delegated to other bodies. At best, those bodies are specific education information agencies that might be able to also provide recognition-related information, but the issue is highly questionable if the information is left to general representations of countries abroad, overall national promotion agencies, embassies etc., as mentioned in several NAPs. The problem here is that the information at the level of those providers is usually too general and targeted at general public or young people who are considering going to study abroad. Lack of the recognition specific information causes the need to send large number of questions to other countries’ ENICs to receive information that could otherwise be found on the web.

**Summary on information provision.** The quality of information provision seems to be quite different in different countries. With regard to information provision the spectrum is quite broad. It ranges from such countries that have excellent information for applicants in their national language and in English (or other widely spoken European language) available online, in printed and possibly in other forms; to countries where only minimum information is provided in the national language only and this information may be available at the ENIC/NARIC centre.

An example of good practice is that provision of recognition information is coordinated between ENIC/NARIC and the higher education institutions so that the specific information from higher education institutions adds on to the general information provided by the ENIC.

Information on educational systems that is well established in some countries but other countries only provide general information on their educational systems that contains too little information actually needed for credential evaluation.

## 4. Structures

### 4.1 National information centre

Outline the functioning of the national information centre (ENIC/NARIC), e.g. with regard to:

- a. The formal status of the centre;
- b. Legal competence (e.g. advisory or decision making; academic, *de jure* professional, *de facto* professional recognition);
- c. Staff and budget;
- d. Capacity building in terms of expertise and service to the public;
- e. Networking and cooperation at national level and internationally.

#### The formal status of the national information centre

The different options for the setting of the national recognition centre (ENIC/NARIC) may vary greatly across the EHEA. The main ways how the national ENIC/NARIC centre can be established are:

- 1) as a part of the ministry responsible for higher education;
- 2) as a ministry – subordinated organisation, e.g. the Flemish Community of Belgium, Denmark, Turkey
- 3) as an independent agency established either by the government/ministry or ministry together with higher education institutions,
- 4) as a part of the national rectors' conference, e.g. Switzerland,
- 5) as a private company, e.g. in the UK.

In most countries the national information centre is not formally separated from the respective ministry dealing with higher education. In such cases the ENIC/NARIC activities are fulfilled by a separate department e.g. Albania, Hungary, Romania, Serbia, Slovenia; or a division of the corresponding ministry (Greece). In Ukraine it is a board (Licensing, Accreditation and Nostrification Board) of the Ministry of Education and Science.

In some countries e.g. Greece it is planned to increase the autonomy of the national information centres by establishing separately from the ministry as an authority dealing with ENIC/NARIC issues.

There are countries, where the national information centre is enjoying formal status of independence, like, for example, Danish ENIC/NARIC is part of the national authority CIRIUS, which in its turn is under the supervision of the Danish Ministry of Education. The Bureau for Academic Recognition and International Exchange in Poland is a state institution informing the minister of higher education about own activities. In Norway the NOKUT is an independent government agency. In Sweden the national information centre

is a part of the Swedish National Agency for Higher Education, it is independent, but gets its mandate and funding from the government. In France the International Centre for Education Studies is a public institution of the Ministry of National Education

In most cases the national information centre is financially dependent of the respective ministry. In some countries a special funding for this occasion has been allocated e.g. Armenia, Latvia, which alleviates the money handling. In a few cases the ENIC/NARIC is a structural unit of a foundation, i.e. the Estonian ENIC/NARIC is a structural unit of the Archimedes Foundation.

In the Czech Republic – the Centre for Equivalence of Documents about Education, is one of the sections of the state funded Centre for Higher Education Studies. In Italy the role of the national information centre is entrusted with CIMEA, a section of the Fondazione Rui; a private entity legally recognised as a non – profit body.

There are countries where the tasks of ENIC/NARIC are fulfilled higher education institutions, for example, the Icelandic Ministry of Education, Science and Culture entrusted the University of Iceland, with the supervision of Iceland's ENIC/NARIC centre. In Switzerland on its turn the ENIC/NARIC is a department of the Rectors' Conference of the Swiss Universities (CRUS).

There are countries where the national information centre has not been founded by the respective national ministry of education. In Germany the Central Office for Foreign Education (ZAB) is a department of the Secretariat of the Conference of Ministers of Education and Cultural Affairs of the federal states.

The UK NARIC is managed by a private company on behalf of UK Government's Department for Education and Skills. The National Qualifications Authority of Ireland is an agency of the Department of Education and Science and the Department of Enterprise, Trade and Employment.

The competences of the ENIC/NARIC are usually regulated by a national law or secondary legislation. Serbia considers adopting a separate recognition law.

In most cases the ENIC/NARIC has a function to inform and support the decisions made by the competent authorities for recognition

**Role of national information centre in academic and professional recognition.** The area of recognition (professional and academic) and sometimes even the extent of qualification level affected by the decision in different countries vary. Thus, for example, Albania states that "there is no actual difference between the academic and the professional recognition". In Denmark, to create a better synergy, one single national entrance point (namely CIRIUS) in relation to recognition of all kinds of qualifications, both professional and academic, has been created. The ENIC/NARIC centres of EU/EEA countries are often also the contact points for recognition of qualifications covered by EU Directive 2005/36/EC. ENIC/NARIC in Iceland on its turn deals with academic recognition issues only. Professional recognition there is handled by the appropriate ministries.

In those cases where ENIC/NARIC is not responsible for professional recognition in the relevant professional area, it refers applicants to the appropriate competent authority, acting as the contact point for the information on recognizing authorities within the country. Some ENICs perform *de jure* professional recognition of teacher qualifications for the purpose of practice of the profession (e.g. Hungary, Denmark). In other cases, upon request by the applicant, the Hungarian ENIC/NARIC assesses the foreign qualification and does *de facto* recognition.

In Sweden the decisions by the ENIC/NARIC on teaching certificates have formal legal status. But other regulated professions in Sweden are evaluated by the competent authority appointed by the Government.

In most cases the ENIC/NARIC has an advisory role and the decision on recognition is taken by a different competent authority. The recognition statement made by the ENIC/NARIC is essentially a recommendation and thus not legally binding. It usually describes the level and status of the given credential in the country of its origin and often the possible recognition in the host country in question. The final decision in countries e.g. the UK, Latvia, Cyprus, Poland, Turkey, Italy, Ireland, Serbia, Norway, Spain, Sweden, the Netherlands lies with the higher education institution, employer or professional body concerned. However, it is usual that the position taken by the national information centre is trusted and endorsed by the bodies concerned. In order to ensure quality of decision making on the basis of the recommendations issued, the Swiss ENIC/NARIC participates in the CRUS Commission for Admission and Equivalence, which oversees the recognition practices of the universities.

In some cases the competence of the ENIC/NARIC is planned to be changed to decision making e.g. Latvia, but other countries e.g. Estonia do not plan to change anything in the status of the national information centre.

The decisions taken by the national information centre in the French Community of Belgium have the form of decrees in the name of the government and therefore have a legal status “a favourable decision on the equivalence of a foreign diploma ... provides the same legal effects as the diploma awarded in the French Community to which it is considered equivalent”. France on its turn states that “a legal principle of equivalency between foreign qualifications and French qualifications awarded by the ministry of national education, higher education and research does not exist”. Therefore the admittance of foreign students in French higher education institutions requires a decision on exemption, issued by the Rector or the Director of the institution concerned.

There are countries with ENIC/NARIC sharing both advisory and decision making functions and having advisory role in academic recognition and decision making role in professional recognition. Thus, for example the Hungarian ENIC/NARIC operates as an advisory body in the issues of academic recognition but it makes legally binding decisions in cases concerning the recognition for employment purpose, the situation is similar in Armenia. The Slovak Centre for Recognition of Diplomas decide upon the recognition of

qualifications of citizens of the Slovak Republic and EU member countries received abroad for the purposes of performing regulated professions and issue of a certificate on automatic recognition of higher education of the third cycle obtained abroad/on educational competence obtained at the territory of the Slovak Republic. In Albania, the Department of the Higher Education and Recognition of Diplomas researches the cases and provides a draft decision, which is then signed by the Deputy Minister and thus becomes valid.

*Summary of the role of national ENIC/NARIC in academic and professional recognition*

The most typical case is that national information centre is an advisory body for both academic and professional recognition while the decisions are taken:

- for academic recognition - by higher education institutions,
- for *de facto* professional recognition in non-regulated professions – by employers,
- and for regulated professions – by competent authorities of each profession.

There are several other possibilities:

- ✓ ENIC/NARIC is the decision-making body for all cases of recognition,
- ✓ ENIC/NARIC centre makes decision in the name of minister,
- ✓ Decisions are taken by minister/vice/ minister/ ministry upon advice of:
  - ENIC,
  - higher education institutions or
  - committees of academics/scientists.

In a number of countries ENIC/NARIC makes recognition decisions with a view of employment in non-regulated professions. While in most cases the *de jure* professional recognition for employment in regulated professions is carried out by competent authorities (often professional organizations) nominated by government, in Malta and Iceland the specific ministries are in charge.

**A summary: who actually makes recognition decisions?**

In a substantial number of countries e.g. the Czech Republic, Estonia, France, Georgia, Germany, Latvia, Liechtenstein, Netherlands, Poland, Switzerland, the UK national information centre is an advisory body while the decisions are taken: for academic recognition - by higher education institutions, for *de facto* professional recognition in non-regulated professions – employers and for employment in regulated professions – competent authorities nominated for each profession.

However, that is not the only possibility. In some cases e.g. Armenia, the French Community of Belgium, Croatia, the ENIC/NARIC is the decision-making body for all cases of recognition, while in Denmark the decision is nominally made by the Minister of Education but the ENIC/NARIC centre does it in the name of Minister.

Recognition decisions can also be taken by minister/vice/ minister/ ministry as in e.g. Albania, Lithuania, Romania, and Ukraine (by nostrification board of the ministry), Bulgaria (commission for recognition established by the minister), “the former Yugoslav Republic of Macedonia” and others. The case of “the former Yugoslav Republic of Macedonia” is interesting as the recognition seems to be done in a reverse order compared to the “typical” case: in “the former Yugoslav Republic of Macedonia” the higher education institutions prepare recognition decisions, these decisions are examined by the ENIC/NARIC and then officially signed by the minister. In Turkey the recognition decisions are made by the Council of Higher education (whose part is the ENIC) but higher education institutions have no function in recognition at all. In Spain, while higher education institutions can decide upon recognition of master and doctoral degrees, for all other degrees the decisions are not any more taken by the ministry but instead technical committees created within the University Coordination Council will issue general reports on a particular foreign qualification.

In a number of countries the ENIC/NARIC makes recognition decisions with a view of employment in non-regulated professions, e.g., in Greece (here the academic and *de facto* recognition is considered the same), Hungary, Slovenia and Sweden.

While in most cases the *de jure* professional recognition for employment in regulated professions is carried out by competent authorities (often professional organizations) nominated by government, in Malta and Iceland the specific ministries are in charge.

### **Staff and budget;**

The number of persons involved in the national recognition process ranges from 40 (administrative personnel included) in the UK, closely followed by 36 staff members in Germany down to 1 person responsible for recognition issues in Albania. However it is planned to increase the staff till 3 members in 2007 in Albania. In some countries e.g. Slovakia, Turkey the employees are civil servants even if the ENIC/NARIC is not part of a ministry.

Staff members are not always employed full time, for example, in Iceland the 5 persons dealing with recognition, none is employed full time. Staff is sometimes supported by senior policy experts in the respective organizations who are not dealing with the processing of recognition applications as their primary job, as e.g. in Ireland. In France “*rectorats*” – that is, State administrations depending on the ministry of Education (MENESR) and set up in each local Education area (*‘académie’*) in France – are competent to provide recognition attestations indicating level of studies to holders of foreign credentials living in their region”. In Denmark CIRIUS occasionally buys consultant services. In Ireland, experts and internship students from foreign NARICs and higher education institutions in e.g. Poland, Germany and Italy have worked for short periods with Qualifications Recognition.

In somewhat larger units, next to the (professional, academic) evaluation experts there may be: head of office, secretary and information officer. The Estonian ENIC/NARIC

shares the services of the general secretariat,, the accounting department and the IT manager with the other departments and offices of the Archimedes Foundation. Latvia plans to employ a lawyer, Iceland already does. CIRIUS in Denmark considers the inclusion of juridical competences “both necessary and a clear advantage in connection with CIRIUS’ efforts to establish itself as an authority making authoritative decisions and standard setting and to proactively influence the legal framework and frame of competence of CIRIUS”.

The budget ranges from 25,000 EUR (Latvia) up to 1.175.000 EUR (Denmark, without 25% of indirect costs). In a number of countries e.g. Albania, Belgium French Community, Hungary, Serbia, Spain where the national information centre is part of a bigger organisation the national information centre budget is not separated from the overall budget.

### Staff and budget of national ENIC/NARIC centres

Country	Staff	Comments	Budget
Albania	1		no separate budget
Armenia	6		50 000 USD
Belgium French Community	5		no separate budget
Czech	3	full-time	
Denmark	14	head of office, 7 credential evaluators, one information officer, to employees dealing with professional de jure recognition and one secretary. 2 part time student employees	1.175.000 EURO to recognition of foreign qualifications (direct cost) with the addition of approximately 25 percent of this amount to indirect cost (administration, support etc.)
Estonia	3.75	full time equivalent staff positions	
France	5	full time	150 000 Euros, all charge included
Georgia	5	head of the division, two senior specialists and two specialists	The budget of the division is the part of the budget of the Ministry of Education and Science. The annual salary fund of the division is about 29,400 Gel (1GEL = 0.45€)
Germany	36	full-time equivalent of 28.5 positions	the Central Office does not have a separate budget
Greece	21	permanent staff, there are also academic advisors (temporary staff)	
Hungary	13		no separate budget
Iceland	5	part-time	The Ministry does not pay for its day to

Country	Staff	Comments	Budget
			day operations, but has paid for variable costs. Decisions on the payment of these expenses are taken on an <i>ad hoc</i> basis. Apart from this, the unit is financed from the budget of the University of Iceland
Ireland	4	full-time, and 3 part-time	
Italy	2	full-time and 2 part-time	Euros 230,000.00
Latvia	2	full time and 1 half time	2006 – 25 000 EUR per year, 2007 – est. 50 000 EUR per year
The Netherlands	25	not all full-time	
Norway	10 ½	full-time equivalents	ENIC-NARIC function within NOKUT has approx. EUR 606,061
Romania	15		The NCRED is doubly financed, from the State Budget and from the external sources (its own funds).
Serbia			No separate budget
Slovakia	9	civil servants	
Slovenia	8		
Spain			No separate budget
Sweden	22	The information centre is part of the Department for Evaluation of Foreign Higher Education, within the National Agency. The Department has a staff of 22 of whom 16 are credential evaluators.	The budget for the Department is about 11.5 million SEK (of which 10.5 are costs for staff), plus overhead costs.
Switzerland	4	2 scientific collaborators and 2 secretaries	CHF 405'000
UK	40	There are 15 members of staff employed on activity concerned directly with the recognition and evaluation service. This function operates and is supported by a wider infrastructure with a total of 40 staff	The UK NARIC service is provided on a self-funding basis.
Ukraine	9		
Turkey	5	civil servants	

## **Capacity building in terms of expertise and service to the public**

The UK operates a structured and continued personal development policy, including induction training and continued professional development.

CIRIUS in Denmark “employs internal as well as external Quality Assurance mechanisms. An employee manual (personalehåndbog) collects the accumulated knowledge and best practice. The manual functions as a starting point for staff training and is a guarantee that cases are handled in a professionally consistent way. The assessment procedures for the various qualification recognition modes are described step by step. Other internal mechanisms are recurring evaluation seminars, checklists supporting the evaluation procedure and double-checking of all statements. The filing of all incoming and outgoing mails is introduced to support the sharing of knowledge and information and consistency in assessments. An annual “contract” between the Director and the Permanent Secretary of the Ministry of Education forms the basis of the external QA-mechanisms. CIRIUS is responsible for preparing annual report on the state of recognition work in Denmark. This report is transferred to the Ministry of Education and presented to the Parliament (Folketinget) by the minister.”

In Albania no special qualifications are formally stipulated for the ENIC/NARIC staff. In some cases, e.g. in Sweden credential evaluators should have at least a Bachelor Degree. Except for the secretary and the student employees all employees hold a degree at Master degree level in Denmark. All staff members of the Estonian ENIC/NARIC hold at least master’s-level qualifications, same as in UK. Many countries emphasize that staff members should have skills in assessment of foreign qualifications and should be familiar with the international and national legal framework for recognition. This can be acquired either by recruiting the new staff members preferentially from related fields of activities, or ideally, by maintaining the staff loyalty and accumulating the staff experience. Thus, for example, in Iceland both of the specialists have even been involved in academic recognition for more than 20 years In Sweden half of the staff has been working with credential evaluations for more than ten years; several others have about five years experience.

The knowledge of languages is essential. Apart from common languages as English, German, French and the Nordic languages, including Finnish, the office in Sweden handles documents in Spanish, Russian, Polish, Turkish, Chinese, Japanese and Arabic. In Denmark apart from Danish, Norwegian, Swedish, English, French and German – CIRIUS is currently able to deal with files in Finnish, Spanish, Greek, Russian, Ukrainian, Turkish and Arabic. 5 nationalities are represented in the CIRIUS staff. In addition to the abovementioned the candidates for employment at the Latvian ENIC/NARIC have to be computer literate and have skills in using ICT.

The expertise of the staff is gained through on the job training i.e. processing of case-files as the most common method (Latvia, Armenia), communication with other members of diverse networks, regular trainings and participation in the international meetings both as speakers, trainers and simple participants, study visits and international projects/co-

operation. Latvian ENIC/NARIC organizes internal staff training in order to present and implement the latest developments in the field of recognition.

The ENIC/NARIC often performs knowledge transfers to the national higher education institutions and other competent recognition authorities. As a result the external bodies should be able to improve their services to the public. Georgia posts the revealed forged documents on the web page of the ministry. The Estonian ENIC/NARIC in cooperation with partners from other countries or under the auspices of some international organisations, organises at least one international training course on recognition issues, Bologna process or assessment of foreign qualifications per year. It is planned to run such national level training courses regularly 1 to 3 times per year. Poland also invites foreign experts to conferences and workshops organised for higher education institutions. It is not rare that the staff members are invited to participate in the working groups established by the respective Ministry of Education and other law elaborating entities.

The information database is essential in the work of academic recognition. The Centre in the Czech Republic maintains two databases on higher education institutions, their accredited study programmes and fields of study – in Czech and English. Ireland is currently developing an online database which will provide advice regarding the comparability of foreign qualifications in Ireland as well as information regarding education and training systems abroad.

*Summary on capacity development.* Competence development is underlined as an important aspect by a number of ENICs. The main kinds of capacity building measures inside ENICs are staff training and regular updating, participation in the ENIC/NARIC joint meetings, study visits, organising national or regional training and dissemination events (Nordic, Baltic countries, and others), preparing detailed manuals for staff, recruiting of staff with specific knowledge of education and/ or language skills relevant to different world regions.

Another important part of capacity building is organising different dissemination and training events for the recognition staff of higher education institutions and providing guidance to higher education institutions..

Again, many of those important measures seem to be present in a number of most well supported and developed national information centres while a number of others mainly mention study visits or have not given any notion of capacity building measures at all.

### **Networking and cooperation at national level and internationally.**

The range of cooperation partners is directly dependent on the range of activities of the office. Thus, for example, in Germany the Central Office for Foreign Education works very closely with the German Federal Foreign Office, the German University Rectors' Conference and the German Academic Exchange Service (DAAD), as it is "involved in the preparation of government agreements on equivalency in the higher education area as

well as in equivalency arrangements of another sort". CIRIUS' assessments are seen as part of the integration process of foreigners in Denmark. In this respect CIRIUS has close relations with guidance counsellors, job centres, social partners and other parties engaged in integration.

The partners depend on the role the recognition office plays. The Danish Integration Ministry is another important partner of CIRIUS, since its assessments form part of the integration process by clarifying foreigners of their possibility to seek employment or further education in Denmark. Collaboration worth to mention has developed in Italy "with professional councils, and such organisations as chambers of commerce, trade unions, etc., regional authorities competent for education and training, CRUI, higher education institutions, and other public authorities in charge with finalised academic recognition".

Also the staff members define the scope of collaboration and networking. Due to the part time activities of staff members, the office employees in Iceland participate in the work of the NUAS Ekvivaleringsgruppen, and NUS (the Association of Nordic Universities) and EUA (European University Association). The head of staff in Iceland is the Secretary General of the Icelandic Rectors Conference. Staff members in the Netherlands are active in various national and international networks, e.g. KBS, a network of international student counsellors.

At national level the ENIC/NARIC centres collaborate with different ministries, and national education institutions, student unions, rectors' conferences, national accreditation service, quality assurance agency and similar bodies.

As other cooperation partners are mentioned: transparency and information centres – Europass, Euroguidance, Eurydice, and Eures, mobility agencies – e.g. Socrates. Ireland, for cooperation at a national level, even established a consultative group "to advise it on its approach to performing its recognition co-ordination function and to working with stakeholders, in general, and awarding bodies, in particular, in this regard".

Nordic ENIC/NARIC-offices have formed an umbrella organisation called NORRIC. There is also a strong cooperation between the Baltic ENIC/NARIC centres. Austrian ENIC/NARIC has organized a close cooperation with the ENICs of the neighbouring countries and beyond.

At international level ENIC/NARIC centres, first of all, are members of the ENIC and within the EU/EEA also NARIC networks. Apart from that, they most often mention collaboration with foreign higher education institutions. There are evidently very internationally active centres – e.g. CIMEA (the Italian ENIC/NARIC) is a member of the ENIC, NARIC and MERIC networks, but it also cooperates with AEC, EAIE, EURES, FEDORA, ECSTA, FEANI, as well as with foreign organisations like Education International, NAFSA, NIAF, and WES in the USA, BBT in Switzerland, DAAD in Germany, the British Council as well as foreign Embassies and Consulates, etc.

## **4.2 Cooperation recognition/quality assurance bodies**

- a. Information exchange between the bodies responsible for recognition and quality assurance;
- b. Discussion of an agreement on working methods between these bodies;
- c. Use of information on the outcomes of quality assessments in the recognition of qualifications;
- d. Use of membership of international networks and associations in recognition (e.g. ENIC and NARIC Networks) and quality assurance (e.g. ENQA) for the mutual benefits of both bodies.

The section on cooperation between recognition and quality assurance bodies seems to be one of the least developed in many National Action Plans. The answers to the questions of this section if at all provided are uneven and do not allow to draw many conclusions. One reason for this might be that the information on quality assurance that the ENIC/NARIC centres need in their everyday work is nowadays available on the websites of the quality assurance bodies and so the ENIC/NARICs can use them without direct contacts to the staff of national quality assurance centres. What regards information on quality assurance status of programmes or institutions in other countries, ENIC/NARICs are used to easily get information through the close and well-established cooperation within the ENIC and NARIC networks.

### **Information exchange between the bodies responsible for recognition and quality assurance**

In a number of countries, e.g. Armenia, France, Ireland, UK there is close cooperation between the bodies responsible for recognition and quality assurance, some others e.g. Serbia plan to establish such cooperation. There are countries e.g. Belgium (French Community) Estonia, Denmark, Ireland, Norway where the quality assurance body is a part of the body responsible for recognition or vice versa, or where both bodies are part of some umbrella organization.

Others e.g. Germany, Czech Republic, Latvia, the Slovak Republic do not have an institutionalised cooperation between recognition and quality assurance bodies, but these bodies have frequent contacts in everyday work and use each other's information base. Some of these countries admit that informal information exchange also takes place when representatives of both bodies participate in seminars on quality evaluation and recognition or when both bodies are represented in working groups concerning development higher education, including in creating a national qualifications framework. This might also be the case in other countries.

Finally, some of the countries - e.g. Georgia - did not yet have a quality assurance agency.

## **Discussion of and agreement on working methods between these bodies**

The most far-reaching agreement on working methods between ENIC/NARICs and quality assurance bodies is the Joint declaration by some of the countries participating in the European Consortium for Accreditation in Higher Education (ECA). This declaration aims at establishing a mutual recognition of accreditation decisions that might in future lead also to automatic recognition of qualifications.

Some other countries state that they have a clear structure of competences of both bodies and therefore believe that there is no need to have specific agreement on working methods between these bodies. France currently studies the activities of the two institutions, Germany plans to. In Denmark both organisations already have descriptions of their working methods in the fields of recognition and quality assurance. They have been published on their respective websites. A proposal of setting up new structures for accreditation and quality assurance in Denmark is on hearing.

Norway has proposed an important angle of the cooperation between quality assurance and recognition: quality assurance is a powerful implementation tool of the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance of institutions and programmes.

## **Use of information on the outcomes of quality assessments in the recognition of qualifications;**

In most countries the ENIC/NARIC centre disseminates the information on the outcomes of quality assurance to other ENIC/NARICs so that the latter can use this information when assessing qualifications, they seek for similar information from sister ENIC/NARIC centres but also consult national and international quality assurance bodies regarding quality assessments which have been undertaken abroad.

The UK takes into account a range of factors, including any available information on the outcomes of quality assessments. France seeks to improve its procedures that could evolve towards the inclusion of competences in the recognition process. The French Community of Belgium states that “information about the quality of foreign institutes that award diplomas for which recognition is requested is not taken into account in the criteria for awarding equivalence. Estonia states that “all outcomes of quality assessment are available to the Estonian ENIC/NARIC”. Germany informs that German legislation does not allow to award accreditation of degree courses in which a degree is awarded exclusively according to foreign law. The Swiss ENIC/NARIC recognizes accreditation decisions taken by the respective quality assurance body.

## **Use of membership of international networks**

Most of the countries simply state that the respective bodies are active members of the ENIC and NARIC networks and of ENQA (Norway, UK). The participation of different countries in current international debates on quality assurance varies in its involvement

strength, if applicable. France and Poland are “observers” in ENQA. Both UK and Ireland state a very close cooperation with ENQA based on the close involvement of the representatives of the bodies in the board of the association. Estonia informs that “there are no direct contacts between the Estonian ENIC/NARIC and ENQA.” In Iceland the recognizing bodies are the universities, which make it difficult and costly to be members of international networks and associations.

The French Community of Belgium plans in the future, to be more “active in events related to mobility and the recognition of diplomas and qualifications (NAFSA, EAIE, student exhibitions...)”. Thus for example AEQES is a candidate member of the ENQA network, respective institution in Serbia as well.

*Summary on cooperation with quality assurance.* Information on quality assurance is used in the daily work of credential evaluation. In a number of countries the ENIC/NARIC centres widely use the information on quality assurance when assessing foreign qualifications. They also provide the sister ENIC/NARICs with information on quality assurance status of programmes and institutions in their countries. As the information on quality assurance is often accessible online, the above does not necessarily mean that ENICs/NARICs have intensive daily contacts with their own country’s quality assurance body.

The most far-reaching agreement between ENIC/NARICs and quality assurance bodies is the Joint declaration by some of the countries participating in the European Consortium for Accreditation in Higher Education. Its final goal – eventual automatic recognition of qualifications however can only be reached through a long-term bilateral work.

It has been noted that recognition and quality assurance bodies often discuss the relevant issues and work together at various national working groups or during workshops, especially in those devoted to establishment of national qualifications frameworks.

Quality assurance is a powerful implementation tool of the framework of the Lisbon Recognition Convention in higher education institutions if the assessment of recognition practices becomes part of the quality assurance of institutions and programmes.

### ***National Action Plans as a collection of best practices***

National Action Plans for recognition can also serve as collection of the best practice within the European Higher Education Area. The section below shows examples of best practices in various aspects related to recognition.

A number of countries have found suitable solutions in the ‘triangle’ of Lisbon Recognition Convention legal framework as international legislation, national laws and regulations concerning recognition and the issue of institutional autonomy. The solution usually has been found either through transposing the principles of Lisbon Recognition Convention legal framework into the national legislation or through making fair recognition of foreign qualifications a criterion for quality assurance of higher education institutions. Some

countries have clearly demonstrated in their National Action Plans for Recognition that they apply the legal framework of the Lisbon Recognition Convention according to the spirit of the documents and do not just seek formal compliance with the letter of these documents.

In some countries the principles of the Lisbon Recognition Convention legal framework are also applied at recognition of qualifications from countries that are not parties to the Convention. At least in some countries there is a clear emphasis to identify and compare learning outcomes and not programme details – and the learning outcomes' approach is also applied at recognition of study periods.

A number of ENIC/NARIC centres supply higher education institutions and employers with information on foreign educational systems and recommendations for recognition of most frequently appearing qualifications, make recommendations on recognition of qualifications from particular countries, create collections/ databases of previous experiences.

The Flemish Community of Belgium and France are already advanced in RPL (recognition of prior learning). In Finland, a working group has made recommendations for common national principles for the recognition of prior learning to be applied in all higher education institutions. In Denmark, the ENIC/NARIC will assess applications from persons lacking evidence or having partly evidence.

A number of countries can firmly state that their higher education institutions trust and rely upon and intensively cooperate with their national ENIC/NARIC centre. In several cases the cooperation includes providing feedback on the recognition decisions the higher education institutions make. Several countries have established mechanisms to identify mistakes in the recognition practices.

There are examples where clear procedures for appeal against a recognition decision have been established.

Quite many ENIC/NARIC centres provide information on the home country's qualifications framework/system for use by credential evaluators abroad and on the quality assurance status of the institutions/programmes in the home country. There is also an information package for the applicants, including application forms, information on criteria and procedures applied, information on possibilities for appeal. The information is available either on the website or upon request or in printed versions

*Joint applications.* Finland has created joint application system for Bachelor degree programs conducted in English in the Finnish polytechnics, applying the same admission criteria.

Dissemination of good practice is another task to be taken up in the next Bologna period – as fulfilling the tasks for recognition actually means that all of the above should become reality throughout the whole EHEA

## Concluding remarks

The National Action Plans show that countries are striving to implement the principles of the Lisbon Recognition Convention. At the same time the National Action Plans also demonstrate that the real practices of assessment of foreign qualifications are very different in different countries – and that means that the outcome of the assessment of the same qualification could also differ in different countries.

The Lisbon Recognition Convention and its subsidiary texts are indeed setting standards for recognition. These standards are and they should be flexible to accommodate the whole variety of different qualifications in the European region and of the national settings. But, as a side-effect, this flexibility unfortunately also opens doors to different understanding of the most important principles of the Convention in different countries:

- Applicants should have the right to a fair assessment of their previous qualifications or study periods, but – how is ‘fair assessment’ understood and how far does the ‘right’ go in the eyes of different countries?
- A qualification should be recognized if there are no substantial differences with the relevant host country’s qualification, but how does each country interpret the ‘substantial differences’?

To reach the final goal – to ensure more coherent recognition across the EHEA, we have to

- find an appropriate solution in the ‘triangle’ of Lisbon Recognition Convention legal framework as international legislation, national laws and regulations concerning recognition and the issue of institutional autonomy in all countries,
- carry out international discussion of the variety of national recognition practices (including stages therein) and terminology,
- continue discussion and reach consensus on the understanding of “substantial differences”
- and follow up by tuning national approaches to recognition, recognition practices and terminology.

And the final measure of our success will be – a greater coherence in outcome of the assessment – i.e. that assessment of one given qualification in different countries leads to relatively similar result.

### ***Collection of good and not so good practices***

<b>Good practice</b>	<b>Not so good practice or unacceptable practice</b>
National legislation has been adopted or amended on the basis of principles laid down in the Lisbon Recognition Convention and its Supplementary legal texts.	National legislation is not amended after ratification of the Lisbon Recognition Convention. National legislation uses outdated terminology linked to such concepts and approaches in recognition which the Lisbon Recognition Convention aims to abolish ( <i>nostrification, equivalence</i> )
The principles of the Lisbon Recognition Convention are transposed into the national legislation. Higher education institutions observe the national law and hence follow the Convention principles	National legislation contradicts with the legal framework of the Lisbon Recognition Convention. Observing national law, the institutions actually ignore the Convention principles.
Institutional recognition procedures are related to quality assurance: since fair recognition of qualifications is a part of quality, the institutional recognition procedures and implementation of the Lisbon Recognition Convention are included in the institutional internal quality assurance and assessed at the periodic quality reviews, audits or accreditation.	It is considered impossible to implement principles of the Lisbon Recognition Convention at institutional level: it is considered as breach of institutional autonomy.
Databases of recognition cases which can be used to make recognition procedures simpler in similar cases.	For autonomy reasons it is considered that state cannot request information from higher education institutions regarding recognition cases
<b>Authenticity and translations of documents</b>	
If necessary, authenticity of documents is verified through the correspondence with the country of origin.	Requesting that all documents have 'apostille'
Not requiring translations if the documents are in widespread European	Requesting that all documents to be presented are officially translated

Good practice	Not so good practice or unacceptable practice
languages	
Applying the Lisbon Recognition Convention principles to all applicants including those whose qualifications originate from countries that have not ratified the Convention.	
<b>Bilateral agreements</b>	
Discontinue further concluding of bilateral agreements with States parties to the Lisbon Recognition Convention but develop bilateral recommendations with these countries or regionally, working using the Convention as the only legal basis instead.	
<b>Recognition criteria and procedures</b>	
Acknowledge differences between educational systems and take them into account at assessment of foreign qualifications	
Moving away from seeking full comparability of the foreign qualification to the relevant home qualification towards comparing only those aspects relevant to the rights, which the holder is willing to exercise in the host country	Seek for full comparability of programme contents
Using quality as a criterion and trusting the quality assurance in the country of origin	Attempting to review the foreign higher education institution, department and the programme instead of checking the quality assurance status with the issuing country's quality assurance body
Whenever possible, basing recognition on comparison of learning outcomes, competences	Using programme duration and content details as main criteria for recognition
Attempting to assess qualifications even in those cases when evidence is incomplete or lacking	Refusing recognition in case a relevant qualification to compare foreign qualification to cannot be found in the higher education of the host

Good practice	Not so good practice or unacceptable practice
	country
Granting partial recognition or setting compensatory measures when differences of the foreign qualification compared to the relevant home qualification are substantial with a view of the purpose for which recognition is sought	Applying partial recognition or setting compensatory measures when the differences of the foreign qualification are solely in the course content and are not important for the purpose for which recognition is sought
	Applying a two-stage recognition procedure in which the second stage involves detailed comparison of curricula and material studied, and is at the same time necessary to gain full rights in the host country
	Applying different recognition procedures for different kinds of degrees
	Excluding higher education institutions from the recognition procedure
Academic recognition has consequences in <i>de facto</i> professional recognition, i.e. the recognition for the non-regulated part of the labour market	Require full academic recognition (including comparison of programmes carried out by higher education institutions) if the applicant intends to enter a regulated profession
<b>Measures to improve practices</b>	
Disseminate information on recognition criteria and procedures among all stakeholders and provide advice and training to the relevant staff of the higher education institutions and employers	
<b>Institutional practices</b>	
Institutions apply common procedures/ follow common guidelines/ use common standards in recognition of qualifications. Recognition procedures are part of the internal quality assurance of the higher education institution.	Institutions have not developed guidelines for recognition and the practice is case-to-case and may differ within the same institution.
Countries monitor observation of the principles of the Lisbon Recognition	Countries consider that state cannot influence or monitor recognition

<b>Good practice</b>	<b>Not so good practice or unacceptable practice</b>
Convention and its subsidiary texts are followed by higher education institutions. (Through observing legislation, monitoring preparation of institutional guidelines, encouraging institutions to prepare common procedures for recognition or by including recognition procedures in internal quality assurance of higher education institutions).	procedures at higher education institutions due to institutional autonomy
<b>Prior learning</b>	
In cases where a foreign qualification in question contains credits allocated through recognition of prior learning, accept decision of the awarding institution provided that the institution is recognized in the country of origin	
<b>Transparency tools – Diploma Supplements</b>	
Issuing Diploma Supplements to all graduates of all programmes, free of charge and in a widely used European language	Issuing Diploma Supplements to graduates of the (new) Bachelor-Master programmes only and thus leaving many graduates without Diploma Supplements
Issuing Diploma Supplements also in the languages of national minorities where appropriate	Issuing Diploma Supplements in national language only
Using the official format of the Diploma Supplement and the revised explanatory notes.	Customizing the Diploma Supplements in local versions
<b>Transparency tools – ECTS</b>	
Using quality assurance as a tool for implementation of ECTS, i.e. setting implementation of ECTS as a quality requirement.	Leaving ECTS implementation as completely voluntary, including the choice of the credit system to be applied by each higher education institution
Linking credits with learning outcomes, including learning outcomes of informal and non-formal education and work experience	Keeping contact-hours based credit systems

Good practice	Not so good practice or unacceptable practice
<b>Borderless/transnational education</b>	
Setting regulations in such a way that <i>bona fide</i> transnational education can be legally established and recognised.	Fully ignoring (and refusing recognition of) transnational providers in own country without giving them a chance to demonstrate the quality of the education provided.
In cases where the transnationally provided education qualification is not recognized: using the methodology for recognition of prior learning to check whether some parts of the education in question could be recognized and some credits allocated to the qualification holder.	
<b>Information provision</b>	
Providing applicants with full set of necessary information on recognition: criteria and procedures, how to apply, what documents should be provided. Using different means to provide information: printed, electronic and by telephone	Providing fragmented information on recognition. Information provision only by posting on the wall at the ENIC/NARIC centre or only in paper format.
Providing applicants with online possibilities to monitor the progress of the application or providing no feedback to applicants	Provision of recognition information in national language only
Providing a hotline for higher education institutions to quickly consult on recognition issues	
Coordination of information provision between ENIC/NARIC and higher education institutions, covering both the general and institution-specific information	
Information on own higher education system is available electronically in widely spoken European languages and the content is specifically prepared to be useful at assessment of country's qualifications in other countries	Information on a country's education system is <ul style="list-style-type: none"> <li>a) only available in national language,</li> <li>b) is not focused on issues important in recognition of qualifications</li> <li>c) is being disseminated through too general channels having no</li> </ul>

Good practice	Not so good practice or unacceptable practice
	experience in education (e.g. embassies, representations etc.)
<b>National information centre</b>	
ENIC/NARIC acts as one single entrance point for both academic and professional qualifications.	Decisions upon recognition are made by bodies outside ENIC/NARIC and outside higher education institutions such as “nostrification boards” or “equivalence boards”
ENIC/NARIC cooperates with higher education institutions or their organisations with a view to ensure quality of decision making on the basis of ENIC/NARIC recommendations	Higher education institutions do not participate in decision making on recognition at all
ENIC/NARIC has established internal quality assurance system and is also being assessed externally	
ENIC/NARIC has prepared internal manuals for staff containing step-by-step description of recognition procedures	
ENIC/NARIC organizes regular study visits and training of its own staff and training events for credential evaluation staff of higher education institutions and competent authorities	