



ARCHITECTS' COUNCIL OF EUROPE
CONSEIL DES ARCHITECTES D'EUROPE

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For Adoption

Access to the Profession

Accreditation and Validation

First Report to the Second General Assembly

Final

Introduction

The Work Group was set up to establish the processes by which member countries decide whether a qualification should be notified to the Commission the European Commission for listing in Annex V.7 of Directive 2005/36/EC on the Recognition of Professional Qualifications (the PQD). The Group was mandated to examine the range of accreditation/validation systems that are in place in the different Member States, so that the ACE would have a clear understanding of the different types of accreditation/validation systems that are in use across the EU and how they are being used in Member States. The Work Group was also mandated to identify typical or widely used models.

In examining the current position in the Member States it was to assess whether there is evidence of any confusion and/or variable standards, particularly if the objectives of the systems are different. If there is, the Work Group was expected to identify what the problems might be and what action might be needed (the Terms of Reference set out the objectives of the Group in full).

The issues to be addressed were summarised in the Terms of Reference as follows:

- What are the definitions of the terms accreditation, validation and quality assurance (as applied to education systems) and the differences between these processes?
- What are the purposes and objectives of the accreditation/validation process?
- Which organisations are involved in accreditation/validation of architectural qualifications in each Member State?
- What procedures are used for accreditation/validation (for example documents and information examined, inspection of institutions, frequency of accreditation/validation approvals)?
- What are the possible outcomes of the accreditation/validation process and where are they published?
- Is the process transparent and accountable to the public and the profession?
- Are the processes similar or different between different Member States and in what ways?

Actions taken

The Work Group has met four times, in November and December 2008, and April and July 2009. At the first meeting, it was decided that a questionnaire should be issued to all Member Organisations, collecting factual information about the procedures and systems in their countries. A set of definitions was also agreed. The questionnaire was drafted and piloted by the Work Group, then issued to Member Organisations in February 2009 (Questionnaire 1).

Eighteen responses were received by July 2009. The responses were put into a database (by the ARB EU officer Elisa Simeoni) and a summary profile of each country was drafted by the Chair of the Work Group. The draft database and the profiles were discussed at the July meeting, as were preliminary conclusions and recommendations. It was decided that the profiles should be returned to the respective countries for correction and comment, and to confirm whether the countries intended to list 'access to market' requirements in Annex V.7 of the PQD. At the same time, the Work Group decided that it would be useful to collect some qualitative data, so the respondents were asked additional questions on their views of the strengths, weaknesses etc of the system in their country (Questionnaire 2). By the time of writing this third draft of the report to ACE, seven countries have responded.

The first and second drafts of this report were circulated to the Work Group, and all comments have been incorporated. The second draft was also discussed at the General Coordination meeting in Brussels on 25th September 2009, where comments were made, particularly on the Work Group's recommendations. It was agreed a more general policy would be drafted for consideration at the next General Assembly, which is set out below. The third draft has not been circulated to the Work Group, due to the limited time available.

Definitions

The Group agreed on the definitions of accreditation, validation etc listed in Appendix 1, but after the pilot run of the questionnaire, decided not to use them within the questionnaire. Even with the definitions it was clear that the terms would be understood differently by different countries, which could cause misunderstanding in the response. Instead, the questionnaire adopted the following definitions:

Approval for EU directive listing

The process by which a Competent Authority or other body determines whether a qualification fulfils the requirements of the EU Directive, for the purposes of notification to the European Commission.

Approval for meeting national educational standards

The process by which a national or other body determines whether a qualification fulfils national educational requirements.

Approval for joining professional bodies

The process by which a professional body determines whether a qualification should give the holder the right to join that body. (The professional body may have a wider role, for example encouraging high standards in the qualifications).

Approval for access to market

The process by which a national or other body determines whether a qualification fulfils standards set for access to the national market

Results of Questionnaire 1

Below is a summary of the key results from the 18 responses to the questionnaire, based on the full spreadsheet of responses. For simplicity, some information is omitted and some assumptions have been made (for example, if a country has not answered a question, but it is clear from the context that this is because it does not have a system or procedure in place, this has been counted as a 'no').

Formal systems for approving qualifications (Section C: question 2)

Of the 18 countries:

- 5 have no formalised system for approving for the PQD
- 4 do not have a system in relation to meeting national educational standards or professional bodies (Austria, Belgium, Cyprus and Finland)
- 4 do not have a system for approving access to market requirements
- 3 countries do not have a university QA process.

Bodies involved in approving qualifications for Directive listing (Section D: question 1)

Of the 18 countries:

- in 7 the schools are involved
- in 9 the universities are involved
- in 7 the competent authorities are involved
- in 8 one or more professional bodies are involved
- in 9 one or more government departments are involved

Procedure (Section D: question 2)

Of the 18 countries:

- 4 have no formalised system for approving for the PQD (Estonia, though approval to meet national education standards).
- in 12 a special panel is set up.

- in 6 there is an inspection of the school (for listing purposes, in some countries there may be an inspection for other purposes).
- in 11 other bodies are consulted.

The approval process is normally repeated every 4-7 years, except in Bulgaria where it is repeated monthly.

Basis of approval (Section D: question 3)

In the majority of countries the process is done on the basis of course documents and internal and external reports only. Of the 18 countries:

- 5 inspect examination papers,
- 4 inspect samples of student work
- 5 attend the examination and inspect student work

Are the qualifications formally checked against the PQD or national law requirements? (Section D: question 4)

Of the 18 countries:

- 11 answered 'yes' (in all cases to both)
- in 6 the qualification is **not** checked against the requirements of the PQD or national law requirements
- in 9 it is also checked against additional requirements or criteria.

Result of process (Section D: question 5)

Of the 18 countries:

- in 5 there is opportunity for other organisations to object
- in 12 there is a right to appeal
- in 8 the school has the right to complain
- in 3 the process is subject to external auditing
- in 8 the process is published
- in 10 the results are published

Outcome (Section D: question 6)

Of the 18 countries, holders of the qualification approved for Directive listing can immediately:

- use the title architect (9 countries)
- join a professional organisation (10 countries)
- be employed in an architects office (all countries that responded)
- offer services without using the title architect (7 countries)
- practice independently (4 countries),

National education standards (Section E: question (a))

Of the 18 countries, 5 have a separate system for approving that qualifications meet national education standards.

Professional body requirements (Section F: question (a))

Of the 18 countries, 6 have a separate system for approving that qualifications meet the requirements of a professional body.

Access to market (Section G)

Of the 18 countries:

- 10 set additional access to market requirements for their own nationals (i.e. more than the currently listed qualification)
- 8 set them for non-EU nationals.

These requirements enable the person to:

- use the title architect (8 countries)
- join a professional organisation (10 countries),
- be employed in an architects office (4 countries)
- offer services without using the title architect (2 countries)
- practice independently (10 countries)

- carry out specific functions (8 countries).

In 11 countries, the additional access to market requirements include a period of professional experience. This is subject to a formal approval process in 9 countries, and results in a further certificate or qualification in 7.

In 9 countries, the additional access to market requirements include an examination. This is subject to a formal approval process in 9 countries, and results in a further certificate or qualification in 7.

Results of Questionnaire 2

Below is a summary of the key results from the 6 responses to the questionnaire.

Listing access to market requirements in Annex V?

5 countries confirmed that they intend to list their access to market requirements.

Features of accreditation/validation process identified as 'strengths' and/or good practice:

General features:

- Independent review process which sits between the relevant National institution and the European Commission's process of notification and listing, and which provides a high degree of assurance.
- A system that allows transparent access to the profession, granting a high academic and practical experience for architects. Chambers supervise and thus ensure high quality of architectural services through deontological rules and CPD. Strong role of Chambers in consumer's protection.
- A 'light-touch' but not 'soft-touch' process of approval
- Qualifications offered are subject to regular internal and external accreditation and audit.
- Cooperation between Chambers, Universities and Ministries is in principal good and uncomplicated, expertise is welcomed and there is a current exchange of information.
- Checking and approval of professional experience

Detailed points on procedure:

- Systems which test against national criteria as well as the 11 points set out under Article 46 of the Directive at the same time.
- Allowing institutions to determine what evidence to submit for the purposes of approval (not expecting institutions to prepare special material for approval). This significantly reduces the burden on institutions.
- Full documentary submissions allow an in-depth insight into the content and structure of qualifications it recognises as well as the institutional quality assurance process which underpin those qualifications.
- Institutions creating dedicated areas of their websites to store applications, which include links to information which is routinely stored on institutional websites. Institutions then add to these websites when submitting annual monitoring material and subsequent applications for prescription. This saves the institutions time and ensures that all the relevant material is stored in one location.
- 'Good Practice Handbooks' to provides advice and guidance to those making applications

Areas identified as weaknesses and/or where there should be improvement:

General issues:

- Concern over freedom of schools to develop own programs and widening of access to education leading to variable standards in qualification awarded
- Necessity of 3 years professional experience and a further certificate examination (requirements to be listed in Directive) to ensure standard of entry to profession is sufficiently high and maintained

- Would prefer knowledge of main local building regulations to be checked by local authority if a foreign architect wants to perform his services independently in host country.
- A Ministry represents a lot of other interests as well. All this leads to the fact that decisions are not always taken in the best interest of architecture and architects but as a compromise of many different positions
- The people in the Ministries working as competent authority for architects or working with the PQD (e.g. Group of Coordinators) are not experts in the field of architecture.

Detailed points on procedure:

- Difficulties can arise where material provided for approval is not as up to date as it could be or where particular documents conflict with one another.
- Unorganised or overly voluminous applications for approval can be difficult to scrutinise.
- Process of scrutiny of documents is labour intensive and time consuming
- Visiting schools is time consuming and expensive

Conclusion and recommendations of the Work Group

(Note these are preliminary, as this is on the basis of only 7 returns to questionnaire 2)

The first questionnaire confirmed what the Work Group had originally expected, that there is a wide range of differing models currently in operation by which countries establish which qualifications will be proposed to the commission for listing in Annex V.7 of the PQD. The Work Group considered that this is an issue of concern. It is likely to result in a lack of confidence by the commission, in particular the Expert Group, that sufficiently rigorous systems are in place for them to place reliance on the lists of qualifications put forward. This may result in unnecessarily close scrutiny of the qualifications themselves. Of even more concern was that several countries have no system for checking that the qualifications reach a sufficient standard, and in particular there is no clearly identifiable point where they are formally checked against the requirements of the PQD.

The Work Group proposes that all countries have a system in place to decide whether a qualification should be notified to the Commission the European Commission for listing in Annex V.7 of the directive. It puts forward the following model, in the form of a list of the basic requirements of a reliable system, which it would recommend that all countries adopt:

- The decision is made by independent body or panel
- The decision should be taken at national level, with derogation to regions in appropriate cases
- The body or panel should include those knowledgeable about architecture and architectural education
- There is full consultation with the school/universities, the professional bodies, the competent authority and other interested parties
- The system should involve detailed examination of course documents (learning outcomes), and internal and external auditing reports (visits to the school are desirable if resources permit)
- The documentary submission should be assessed against the PQD, (i.e. that the qualification fully meets all requirements), and it should be clear when and how this was assessed
- The system should be open, transparent, and clear, with the possibility of complaint or review
- The system procedures should be published, along with appropriate guidance to institutions wishing to have their qualifications listed
- Additional access to market requirements should be approved by the same or similar process, and be listed in Annex V.7.

Policy drafted following General Coordination meeting 25 September 2009:

The ACE encourages all Member Organisations to ensure that they have a transparent and accountable process for identifying which qualifications will be proposed for listing in Annex V.7 of Directive 2005/36/EC on the Recognition of Professional Qualifications. The process should include full consultation with the school/universities, the professional bodies, the competent authority and other

interested parties, and it should be clear where and how in that the process the qualification is assessed against the requirements of Article 46.

Appendix 1: Definitions

(Definitions originally proposed by the Group)

Accreditation (= prescription):

The process by which a competent authority or other body determines whether a qualification fulfils the requirements of the EU Directive (the body may also determine whether it meets local requirements such as those set out in national law)

Validation:

The process by which a professional body determines whether a qualification should give the holder the right to join that body. (Note that the professional body may have a wider role, for example encouraging high standards in the qualifications.)

QA (quality assurance):

The process by which educational bodies determine whether qualifications are meeting their own benchmark standards.

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