



ARCHITECTS' COUNCIL OF EUROPE
CONSEIL DES ARCHITECTES D'EUROPE



Architects Council of Europe/

European Network of Architects Competent Authorities

Modernisation of the Professional Qualifications Directive and impact on the architectural profession

**A joint ACE/ENACA study of current provisions, readiness to implement
change and key concerns**

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The purpose of this joint study has been to understand national systems for the training and recognition of architects more clearly so that the ACE and the ENACA can separately support their members in preparing to facilitate both graduate and professional mobility under the new regime of the modernised Professional Qualifications Directive (2005/36/EC).

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Foreword:

The Architects Council of Europe and the European Network of Architects Competent Authorities are distinct bodies which operate independently of one another. The organisations share some important goals, the most significant of these is the objective to simplify the cross-border mobility of the architectural profession while ensuring that standards and consumer protection are maintained.

The modernisation of the Professional Qualifications Directive (2005/36/EC updated per 2013/55) involves significant changes for architects, the profession and the competent authorities working to facilitate professional mobility. The minimum standard for architectural training has been raised from four years full time study to four years full time study plus two years of professional traineeship or five years of full-time study which, while not fully reflecting the standard applying in the majority of EU Member States, is closer to reality than the old “4+0”. Also, and in addition to many other changes, the General System of recognition has been made more flexible and Article 46 has been opened to change.

The purpose of this joint study has been to understand national systems more clearly so that the ACE and the ENACA can separately support their members in preparing to facilitate both graduate and professional mobility under the new regime of the modernised Directive.

The information within this report is a step forward in our understanding of one another and in meeting our objectives to support architects and their clients throughout the EU and EEA.

Wolfgang Haack, ACE Vice president (2014/15), Co-ordinator ACE Thematic Area 1 (Access to the Profession), Organiser of the European Network of Architects Competent Authorities from 2007 to March 2014

1. Introduction

In March 2014 the Architects Council of Europe (ACE) and the European Network of Architects Competent Authorities (ENACA) jointly developed and circulated a questionnaire to ascertain the current position with regard to practical professional experience (professional traineeship) in light of the changes to the minimum training conditions for architects per Directive 2013/55.

The survey was undertaken jointly to maximise possible coverage as the ENACA includes Competent Authorities and professional bodies with a role in qualifications recognition while the ACE has a broader primarily professional membership. The questions were agreed between the two organisations and the survey was open during March 2014. A summary report of the outcomes was presented at the ACE and ENACA meetings held on 27 and 28 March 2014 respectively.

2. Participation

All but four EU Member States provided responses, Switzerland also provided a response.

Fig.1 Participation by MS

| EU MS | Response | EU MS | Response | EU MS | Response |
|----------------------|----------|-------------|----------|-----------------|----------|
| Austria | ✓ | Greece | ✓ | Romania | ✓ |
| Belgium ¹ | ✓ | Hungary | ✓ | Slovakia | ✓ |
| Bulgaria | ✓ | Ireland | ✓ | Slovenia | ✓ |
| Croatia | ✓ | Italy | | Spain | ✓ |
| Cyprus | | Latvia | | Sweden | ✓ |
| Czech Republic | ✓ | Lithuania | ✓ | United Kingdom | ✓ |
| Denmark | ✓ | Luxembourg | ✓ | Extra EU | |
| Estonia | ✓ | Malta | | Switzerland | ✓ |
| Finland | ✓ | Netherlands | ✓ | Liechtenstein | |
| France ² | ✓ | Poland | ✓ | Norway | |
| Germany ³ | ✓ | Portugal | ✓ | | |

¹ separate responses / Federal State and Flanders

² partial

³ Baden-Wurttemberg; Bavaria, Hessen & Saxony-Anhalt

Thirty two organisations provided responses. They were as follows –

Fig.2 Participants

| | |
|-----------------|---|
| Austria | Federal Chamber of Architects and Chartered Engineering Consultants |
| Belgium | ORDE VAN ARCHITECTEN VAN BELGIE Flanders |
| Belgium | Ordre des Architectes Federal state |
| Bulgaria | Chamber of Architects in Bulgaria (CAB) |
| Croatia | Croatian Chamber of Architects |
| Czech Republic | Czech Chamber of Architects |
| Denmark | Danish Architects' Association |
| Denmark | The Danish Association of Architectural Firms (DANSKE ARK) |
| Estonia | Ministry of Education and Research |
| Finland | Finnish Association of Architects SAFA |
| France | CNOA |
| Germany | Chamber of Architects and Town Planners of the German State of Hessen |
| Germany | Vereinigung Freischaffender Architekten Deutschland e.V. Bavaria |
| Germany | BAK, Chamber of Architects Saxony-Anhalt |
| Germany | Architektenkammer Baden-Wurttemberg |
| Greece | ADAS-PEA |
| Hungary | MÉK |
| Ireland | RIAI |
| Lithuania | Ministry of Environment |
| Luxembourg | OAI |
| Poland | IARP Polish Chamber of Architects |
| Portugal | Ordem dos Arquitectos |
| Romania | ORDER OF ARCHITECTS FROM ROMANIA (OAR) |
| Slovakia | Slovak Chamber of Architects |
| Slovenia | ZAPS |
| Spain | Ministerio de Fomento |
| Spain | Consejo Superior de los Colegios de Arquitectos (CSCAE) |
| Sweden | Sveriges Arkitekter |
| Switzerland | State Secretariat for Education, Research and Innovation |
| The Netherlands | Bureau Architectenregister |
| United Kingdom | Architects Registration Board |
| United Kingdom | Royal Institute of British Architects (RIBA) |

As is evident from the list, the respondent group included Professional Bodies, Competent Authorities, Registration Bodies (and bodies combining two or more of these functions) as well as National Co-ordinators for the implementation of the Directive.

Some of the tables below include data gathered through other methods, including a 2011 ENACA survey, to try and develop as complete a picture as possible. The countries included on this basis are Italy and Malta.

3. Access to the profession – minimum requirements

Article 46 of the 2005 EU Professional Qualifications Directive (the PQD) has been amended to

- a. raise the minimum training standard in the automatic recognition regime for architects and
- b. express those minimum training conditions for architects for automatic recognition system in two ways as follows –

Article 46

Training of architects

1. Training as an architect shall comprise:

- (a) a total of at least five years of full-time study at a university or a comparable teaching institution, leading to successful completion of a university-level examination; or*

(b) not less than four years of full-time study at a university or a comparable teaching institution leading to successful completion of a university-level examination, accompanied by a certificate attesting to the completion of two years of professional traineeship in accordance with paragraph 4.

.....

3. The number of years of academic study referred to in paragraphs 1 and 2 may in addition be expressed with the equivalent ECTS credits.

4. The professional traineeship referred to in point (b) of paragraph 1 shall take place only after completion of the first three years of the study. At least one year of the professional traineeship shall build upon knowledge, skills and competences acquired during the study referred to in paragraph 2. To that end, the professional traineeship shall be carried out under the supervision of a person or body that has been authorised by the competent authority in the home Member State. Such supervised traineeship may take place in any country. The professional traineeship shall be evaluated by the competent authority in the home Member State.’;

This is a significant departure from the previous requirement for a four year (University level full time or equivalent) qualification only. While the professional traineeship component is required in a majority of Member States, and reflects the international standard recommended by the International Union of Architects (UIA), it has not previously been required under European law relating to professional mobility and recognition for architects.

In addition to the minimum standard, the Directive requires that a person meet the ‘Home State’ requirements for recognition in the profession before he or she can access the automatic system for recognition in a Member State. This position stands regardless of whether any Home State requirement for traineeship/ post-graduate experience is in addition to, or within, the training required to satisfy the minimum requirements for automatic recognition.

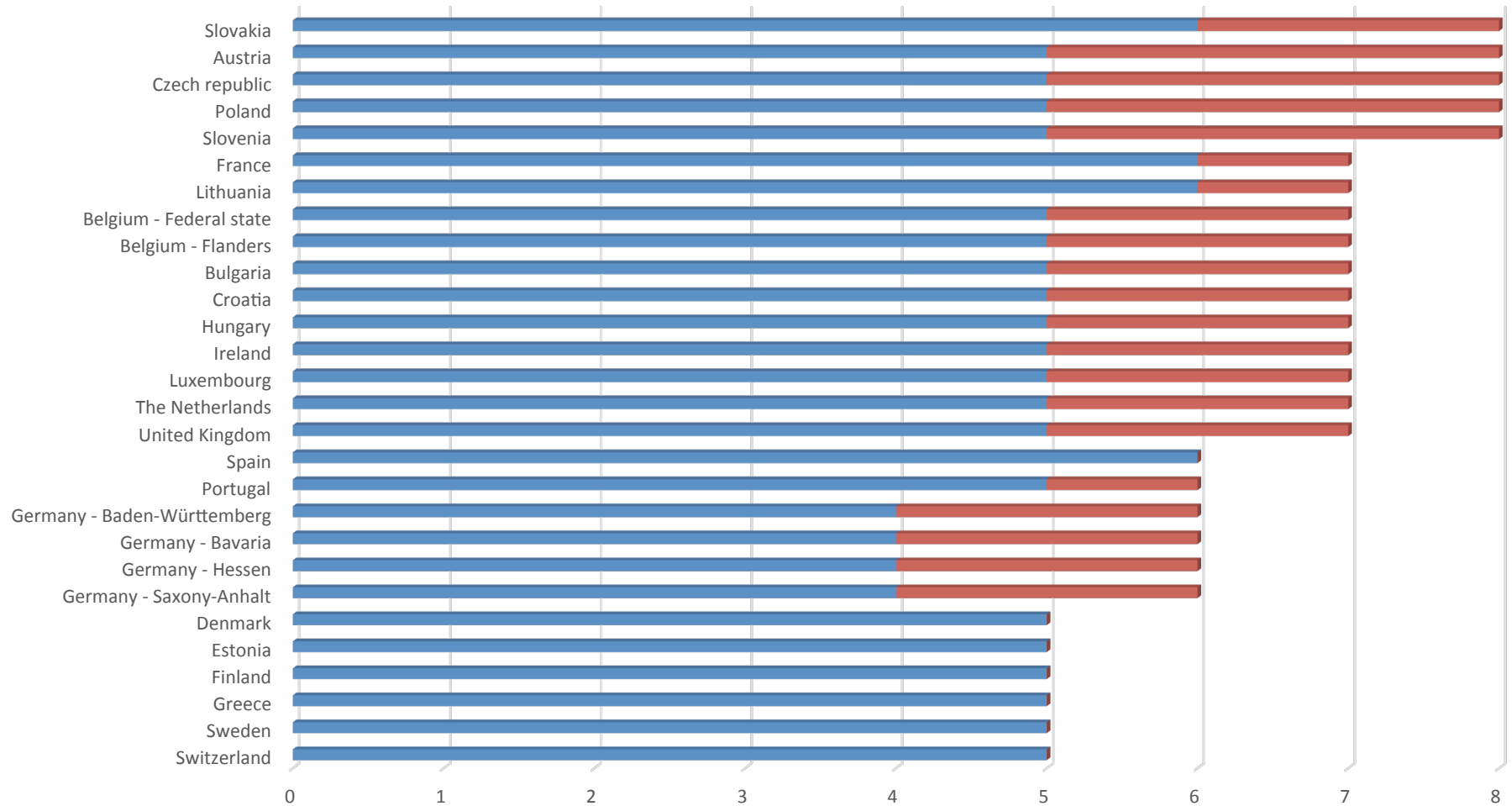
These requirements are listed in Annex V.7.1 of the Directive. Separately, under the 2013 amendments Annex V will be updated by the European Commission through the ‘Delegated Acts’ process whereas under the old regime a vote of the European Parliament was required. Under this new process the Commission will be empowered to actively reject a notification where previously this was not possible.

For the ACE and the ENACA to fulfil their separate objectives with regard to the PQD and its operation it is essential that the current situation at Member State level be ascertained with a view to ensuring:

- that systems are in place to facilitate mobile graduates
- that the requirements are clear to architectural graduates migrating to obtain practical professional experience, and
- that the requirements are clear to the authorities and professional bodies who will have a role in either recognising and overseeing that practical professional experience in most Member States, or assisting the Home State Competent Authority in this role

According to responding States, the current profile of State level qualification requirements for access to the profession of Architect is as shown below:

Fig.3: Minimum study/PPE requirements (in years) per State/federal region for recognition as an architect



The current requirements in terms of formal education range from an overall minimum of five years to eight years. Within these minima there is further variation in the composition of the programme, ranging from six years of formal study plus two years of professional practical experience at the top of the scale alongside five years formal study plus three years professional practical experience down to four years formal study plus two years professional practical experience without assessment or five years of formal study alone.

It is important to be aware that the Directive sets minimum standards for guaranteed or ‘automatic’ recognition in other Member States. What is sometimes forgotten is that the Directive’s intended sphere of influence is not education, it is the promotion and development of the Single Market. It appears to be anticipated that the market will, subsequent to recognition, adjust itself according to who is hired to do what job. Anecdotally, it seems that the different national level regimes for the training of architects are recognised by employers who associate certain characteristics with graduates of different Member States. A significant difficulty arises where the employer is a client and not a professional firm, and the client’s baseline knowledge is at best limited to professional standards and skills in their own Member State.

4. Practical Professional Experience

From the data provided, it seems that Germany and Lithuania⁴ are the only Member States likely to be producing graduates who will have to comply with the new Article 46.1.b stipulations regarding traineeship (practical professional experience) for access the automatic recognition regime at this time. All other Member States, per the data submitted, appear to fit within the five year full-time programme regime and where there is a period of practical professional experience it is above the minimum conditions for automatic recognition set down in 46.1.a.

It seems that in all States it is anticipated/expected that graduates would be paid for their work while completing their professional practical experience. A potential risk of the Directive imposing professional practical experience across professions is that there may be commercial pressures to move towards the ‘internship’ model where graduate workers are not paid.

From an ACE perspective, such non-payment would be contrary to ACE policy. The work undertaken by graduates is genuine skilled work, they have much to learn, but they are already highly qualified graduates. Because professional practical experience is mandatory in most EU Member States, the introduction of internships would see access to full professional recognition restricted to those with the resources to work without pay for a year or more. This is an issue the ACE will continue to monitor.

| Fig.4 Payment during practical professional experience | N | % |
|---|----------|----------|
| Paid at a normal rate | 13 | 65% |
| Paid at a reduced rate | 5 | 25% |
| Other | 2 | 10% |
| Total | 20 | 100% |

In the majority of respondent countries the supervisor for practical professional experience must be an architect. However, supervisors are not generally pre-approved. This would suggest that graduates are generally aware of what is required of them when they leave University and points to the importance of ensuring that graduates leaving their Home State for experience abroad

⁴ Lithuania has a dual regime of 4+3 or 6+1, the 4+3 regime would fit into the new provisions at 46.1.b of the Directive.

understand what is required of them to satisfy the requirements for recognition of practical professional training acquired abroad when they return home.

| Fig. 5 Type of Supervisor required | N | % | Fig. 6 Does the Supervisor have to be pre-approved? | N | % |
|---|----------|----------|--|----------|----------|
| An Architect | 16 | 89% | No | 15 | 71% |
| Employer | 1 | 5.5% | Yes | 6 | 29% |
| Construction professional | 1 | 5.5% | Total | 21 | 100% |
| Total | 18 | 100% | | | |

Similarly, once a supervisor is in place and the graduate is 'in training', the supervisor is generally not monitored (at least not by the Competent Authority). It seems that a mechanism whereby there can be an option for graduates to ensure they are proceeding 'along the right track' especially when working abroad without direct input from the home Competent Authority or an academic supervisor (in the case where the experience leads to an examination run by an educational body) would be desirable.

| Fig.7 Does the competent authority monitor the work of the supervisor? | N | % |
|---|----------|----------|
| No | 19 | 90% |
| Yes* | 2 | 10% |
| Grand Total | 21 | 100% |

There are divergent views from State to State on whether or not the Host State Competent Authority will be able to provide support to Home State Competent Authorities in confirming supervisors for mobile graduates. This may reflect, to some extent, the differences in regulatory models across Member States. It is an area where the ENACA in particular may be able to develop a shared approach of benefit to mobile graduates.

| Fig.8 Will your national competent authority be in a position to approve supervisors for incoming graduates from other member states who have to undertake practical experience? | N | % |
|---|----------|----------|
| Yes | 5 | 21% |
| Maybe | 6 | 25% |
| Don't know | 4 | 17% |
| No | 9 | 38% |
| Total | 24 | 100% |

Where practical professional experience is required, the majority of responding States indicate that specific tasks and types of work must be undertaken to meet practical professional training requirements for recognition in their Home State. Identifying the level of diversity in these requirements from State to State will assist the ENACA in its work to support Competent Authorities in producing clear information for graduates moving from one State to another.

| Fig.9 If practical experience is required in your State, are there specific tasks/types of experience required to be undertaken? | N | % |
|---|----|------|
| Yes | 18 | 90% |
| No | 2 | 10% |
| Total | 20 | 100% |

Three quarters of those States requiring postgraduate practical professional experience also require the graduates to keep a personal record of their experience (Fig 10). This is clearly one mechanism whereby Competent Authorities can follow and assess the experience of graduates undertaking professional training outside of their Home State.

There is significant diversity in the way Competent Authorities anticipate how the monitoring of professional practical experience abroad might be undertaken where it is required (see Figs 11 and 12). It should of course be noted that only Member States in the 4+2 (46.1.b) regime are absolutely required to do this under Article 46.

While there are only two States currently in the 4+2 model there are over twenty which require professional practical experience. There is an opportunity at this time for all countries to review systems in the new context to ensure that graduates receive the best possible information, which in any event will be required per Article 55A⁵. While most States are not currently covered by 46.1.b, the majority already allow for recognition of professional practical experience acquired outside the Home State.

| Fig 10. If practical experience is required, are graduates from your State required to keep a personal record of their experience? | N | % |
|---|----|------|
| Yes | 15 | 75% |
| No | 5 | 25% |
| Total | 20 | 100% |

| Fig. 11 Anticipated mechanism for monitoring PPE abroad | N | % |
|--|---|-----|
| Via the graduate | 6 | 30% |
| Via the Supervisor | 6 | 30% |
| Via the Host CA, the supervisor and the graduate | 4 | 20% |
| Via the Host CA | 2 | 10% |
| Via the Supervisor and the Graduate | 1 | 5% |
| Unknown | 1 | 5% |

⁵ 1. If access to a regulated profession in the home Member State is contingent upon completion of a professional traineeship, the competent authority of the home Member State shall, when considering a request for authorisation to exercise the regulated profession, recognise professional traineeships carried out in another Member State provided the traineeship is in accordance with the published guidelines referred to in paragraph 2, and shall take into account professional traineeships carried out in a third country. However, Member States may, in national legislation, set a reasonable limit on the duration of the part of the professional traineeship which can be carried out abroad.
2. Recognition of the professional traineeship shall not replace any requirements in place to pass an examination in order to gain access to the profession in question. The competent authorities shall publish guidelines on the organisation and recognition of professional traineeships carried out in another Member State or in a third country, in particular on the role of the supervisor of the professional traineeship.

| | | |
|-------|----|------|
| Total | 20 | 100% |
|-------|----|------|

| Fig.12 If practical experience is required, is there an assessment of any kind at the end of the practical experience phase. | N | % |
|---|----|------|
| Yes | 12 | 57% |
| No | 7 | 33% |
| Other | 2 | 10% |
| Total | 21 | 100% |

Only one State indicates that professional training (which counts towards full professional recognition) may be undertaken prior to the making of the final recognised award.

| Fig. 13 If practical experience is required, can any of it be undertaken before completion of the final qualification (i.e. the four year or five year degree)? | N | % |
|--|----|------|
| Yes | 1 | 5% |
| No | 18 | 90% |
| Other | 1 | 5% |
| Total | 20 | 100% |

At this time less than half of those States which require practical professional training have specific stated standards (of knowledge, skill and competence) outlining what must be achieved through the professional training stage. This may arise from a long term common understanding within the profession of what is required to reach the professional level. Work done by the ACE indicates a high level of overlap between those States which have prepared written standards of knowledge skill and competence at the professional level. In an environment where the EU leadership is attempting to increase and drive mobility at graduate and professional level a common understanding and clear guidance for new entrants of what is expected would be beneficial.

| Fig 14. Is there a stated standard to be achieved through the practical training exercise | N | % |
|--|----|------|
| Yes | 9 | 45% |
| No | 11 | 55% |
| Total | 20 | 100% |

5. General concerns

Participants were asked to note any aspects of the new Directive they were concerned about. The following concerns were listed –

- Applicants from outside the EU
- Differentiating internships and professional practical experience
- Home country definition where professionals have studied in one State and achieved recognition following practical experience in another
- The difference between internship and professional practical experience
- Definition of supervision
- Effect of Article 55a
- Lack of clarity re co-existence of 4+2 and 5+0 in one State
- The process taking place under Art. 59 with the objective of Extended deregulation
- how to work with the "4+2" for example: how will this be notified, what to do with young graduates from a 4 year program,
- the relation (if any) between our Academies and the "4+2" requirement and the definitions in PQD

Almost two thirds of respondents indicated that their State or Region recognised categories of architect not eligible under the automatic regime although the majority do not expect to see higher levels of applications for recognition on the basis of the removal of the 'level filter' in the General System.

| <i>Fig.15 General System: Are there any types of architect recognised in your Member State who are not eligible for automatic recognition?</i> | N | % |
|---|----|------|
| Yes | 15 | 65% |
| No | 8 | 35% |
| Total | 23 | 100% |

| <i>Fig.16 General System: Do you anticipate that you will see increased applications under the general system arising from the removal of the 'level' filter.</i> | N | % |
|--|----|------|
| Yes | 7 | 35% |
| No | 13 | 65% |
| Total | 20 | 100% |

6. Conclusion

The ACE and the ENACA continue to work with the new Directive and identify areas where clarity is required so that implementing supports and systems can be developed. This analysis indicates that key areas requiring attention include:

- Information for graduates seeking practical professional experience addressing types of experience, supervision, learning outcomes etc.
- Templates for communicating information to graduates and supervisors
- The importance of completing an accurate picture of the requirements for recognition throughout the EU
- The importance of ongoing engagement with one another and with the European Commission

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For further information see <http://www.ace-cae.eu> and <http://www.enaca.eu>