

B-Solutions

“Roadmap and Factsheet for the Recognition of Qualifications for Highly Demanded Professions”

Step 3: Approach and Findings



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Prof. dr. Hildegard Schneider
Lavinia Kortese, LL.M.

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1. Introduction

This report marks the conclusion of the B-solutions project “roadmap and factsheet for the recognition of qualifications for highly demanded professions”. The objective of the project was to develop roadmaps and factsheets for a selection of three highly demanded professions. Whereas roadmaps aim to provide information on recognition going beyond that readily available online or via first line support services, factsheets aim to raise awareness among citizens regarding the essential aspects of the recognition process.

The origins for the B-solutions initiative can be traced to the European Commission’s 2015 public consultation aimed at identifying common obstacles in border regions. Building on the results of the public consultation, the Commission established its communication “Boosting growth and cohesion in EU border regions” in which it proposed to publish a call for pilot projects to encourage public authorities to tackle legal or administrative border obstacles.¹ This call for pilot projects became the B-solutions initiative. The present B-solutions project was one of the 10 cases selected in the first call of B-solutions projects.² With this project, the partners sought improve the provision of information for regulated professions under the Professional Qualifications Directive.³

Apart from showing what obstacles are experienced in border regions in general, the 2015 Commission public consultation also showed that respondents considered ‘the lack of recognition of education and qualifications’ a major border obstacle within the category of legal and administrative barriers.⁴ The focus of the present project was to improve recognition of qualifications by enhancing the transparency of such procedures.

The recognition of qualifications can be a complex topic. Recognition can be required for the purposes of work and study and is governed by different actors depending on the purpose for which a person is moving across the border. Recognition for the purpose of work (i.e. professional recognition) is central to the present project. This type of recognition can be divided into two categories of recognition: *de jure* and *de facto*. Whereas the former concerns regulated professions, the latter concerns non-regulated professions. Although both of these categories of professions may face challenges, the challenges they face are different in nature. On the one hand, professionals exercising non-regulated professions may encounter the situation where an employer in the host Member State is unfamiliar with the contents of their foreign qualifications.⁵ On the other hand, a person looking to exercise a regulated profession needs to obtain approval (i.e. recognition) from a competent authority

¹ Communication from the Commission to the Council and the European Parliament – Boosting growth and cohesion in EU border regions, COM(2017) 534 final.

² For an overview of all the B-solutions projects, see <https://www.b-solutionsproject.com/pilot-actions>.

³ Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications, [2005] OJ L 255/22 as amended by Directive 2013/55/EU of the European Parliament and of the Council of 20 November 2013 amending Directive 2005/36/EC on the recognition of professional qualifications and Regulation (EU) No 1024/2012 on administrative cooperation through the Internal Market Information System (‘the IMI Regulation’), [2013] OJ L 354/132. The consolidated version of the Professional Qualifications Directive may be consulted via the following link: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02005L0036-20190415>.

⁴ See European Commission, Overcoming Obstacles in border Regions: Summary report on the online public consultation – 21 September – 21 December 2015, p. 16.

⁵ Communication from the Commission on recognition of qualifications for academic and professional purposes, COM(94) 596 final, p. 5; L. Teerling, Erkenning en acceptatie van diploma’s in het beroepsonderwijs: Een speurtocht naar bestaande en vermeende problemen in de Nederlands-Duitse grensregio, EUREGIO Gronau 2018, p. 81.

in another Member State before being able to work there. Recognition procedures for regulated professions are often accused of lacking transparency, being time-consuming and sometimes even discouraging of mobility. This despite the fact that procedures for regulated professions are harmonised at the EU level.

Indeed, Directive 2005/36/EC as amended by Directive 2013/55/EU, also known as the Professional Qualifications Directive (PQD), constitutes the legal framework for procedures regarding the recognition of professional qualifications for regulated professions. That Directive defines regulated professions as those for which qualification requirements are laid down in laws, regulations, or administrative provisions.⁶ Qualifications are then defined as diplomas, certificates, attestations of competence, and work experience.⁷

The PQD provides for an extensive legal framework able to cover any regulated profession. Although the Directive provides for automatic recognition for some professions (mainly in medicine, industry, commerce and crafts),⁸ the majority of professionals exercising regulated professions obtain recognition under the directive's General System, a system which leaves ample discretion to competent authorities to evaluate the content of professional qualifications.

Complexities experienced by individuals undergoing recognition procedures⁹ led to a call in the border region of the Netherlands with Belgium and Germany to enhance the transparency of recognition procedures for regulated professions by improving information provision surrounding the topic. Roadmaps and factsheets were proposed in response to this call. Indeed, smooth recognition procedures can play an important role in facilitating cross-border mobility. When such procedures either take too long or are not taken into account when seeking employment across the border, this may result in the loss of a job opportunity or a decision to abandon working across the border. The decision not to embark on cross-border work is not only detrimental to cross-border employment and mobility, but it also challenges optimal resource allocation and the use of free movement rights by EU citizens.

In order to overcome challenges related to the multitude and fragmentation of actors active in the field of recognition for regulated professions, a territorial demarcation was applied to the project. In particular, the present action focuses on the Dutch border with Belgium and Germany. As far as regulation of professions is concerned, Member States are competent to decide whether and how to regulate a profession.¹⁰ When a profession is regulated (i.e. there is a law, regulation or administrative provision comprising a qualification requirement), a competent authority must be appointed to

⁶ Article 3(1)(a) Professional Qualifications Directive.

⁷ Article 3(1)(b) Professional Qualifications Directive.

⁸ The Professional Qualifications Directive also includes two systems for automatic recognition. This type of recognition is mainly available for professions in the health care sector as well as for professionals exercising professions in crafts, commerce and industry. These professionals may gain automatic recognition on the basis of minimum training conditions (i.e. harmonized education and training) or professional experience. As recognition for these professionals is automatic due to agreements made at the European level in the Professional Qualifications Directive, these professions were not taken up in this B-solutions project. Instead, the present research focused on General System professions, meaning professions for which qualifications are evaluated in terms of content during the recognition process.

⁹ In order to consult examples from practice regarding difficulties faced by individuals during their recognition procedures see ITEM, 'ITEM Cross-border Portal', <https://itemcrossborderportal.maastrichtuniversity.nl/p/publiccases> (enter search term "education" or "(OND)").

¹⁰ Case 222/86 *Heylens*, EU:C:1987:442, para. 10; Case C-340/89 *Vlassopoulou* EU:C:1991:193, para. 9.

handle applications for recognition.¹¹ Both the regulation of a profession and the competent authority corresponding to a particular profession can be organised in a central or decentral way. In the border region at hand, the Netherlands centrally organises matters related to recognition, while Belgium and Germany do not. In relation to Belgium, this B-solutions project focuses on the three Belgian Communities (Flemish, French, and German-speaking). In relation to Germany, the focus is placed on the *Bundesländer* bordering on the Netherlands (i.e. North Rhine-Westphalia and Lower Saxony).

In order to develop the roadmaps and factsheets, a three-step approach was proposed. Due to multitude and fragmentation concerns, there was a need to focus on specific professions. Therefore, the first step was to select highly demanded professions. The second step was the most extensive and comprised the development of the roadmaps and factsheets. To complete this step a literature study related to the professions selected was paired with interviews and questionnaires with the competent authorities of the selected professions. This report marks the third and final step of the project and concerns the documentation of the approach employed during the project as well as findings following from it. The following Sections elaborate on the different project steps mentioned above.

¹¹ Article 3(1)(d) Professional Qualifications Directive.

2. Step 1 – Selecting Highly Demanded Professions

Due to the high level of fragmentation concerning the legislation regulating professions and competent authorities corresponding to those regulated professions a selection of professions was to be made. For this selection, the focus was placed on existing rankings of highly demanded professions established by national and regional employment services.

The term “highly demanded profession” was used in this project to refer to professions in which opportunities lie for citizens. Professions where opportunities lie for individuals are simultaneously also professions for which the labour market is experiencing shortages. This means that in terms of the national or regional rankings of professions, the present project focused primarily on labour market initiatives mapping professions experiencing shortages of employees, thereby being in high demand. The following national/regional initiatives were included for the border region of the Netherlands with Belgium (i.e. the three Communities) and Germany (i.e. North Rhine-Westphalia and Lower Saxony):

Member State/Region		Organisation	Initiative
Netherlands		UWV	<i>Kansberoepen – Update najaar 2018</i> ¹²
Belgium	Flemish Community	VDAB	<i>Knelpuntberoepen in Vlaanderen 2018</i> ¹³
	French Community	Forem	<i>Métiers en tension de recrutement en Wallonie</i> ¹⁴
	German-speaking Community	Arbeitsamt	<i>Liste der Mangelberufe in der Deutschsprachigen Gemeinschaft – Gültig für 2018-2019</i> ¹⁵
Germany		Bundesagentur	<i>Fachkräfteengpassanalyse</i> ¹⁶

Table 1. National/regional rankings of highly demanded professions

Over the course of the first step of this B-solutions project, these different national overviews were combined to assemble a single list of highly demanded professions in the Dutch border region with Belgium and Germany. Again, a number of steps were taken to come to such a single list of professions.

¹² UWV, ‘Kansberoepen – Update najaar 2018’, <https://www.werk.nl/xpsimage/wdo218695>.

¹³ VDAB, ‘Knelpuntberoepen in Vlaanderen 2018’, https://www.vdab.be/sites/web/files/doc/trends/Knelpuntberoepen_2018.pdf.

¹⁴ C. Dalla Valle et al., *Métiers en tension de recrutement en Wallonie – Liste des métiers/fonctions critiques et en pénurie (Hors métiers de l’enseignement): Liste 2018*, Le Forem 2018, p. 3.

¹⁵ Arbeitsamt der Deutschsprachigen Gemeinschaft Belgiens, *Liste der Mangelberufe in der Deutschsprachigen Gemeinschaft – Gültig für 2018-2019*.

¹⁶ Bundesagentur für Arbeit, ‘Statistik’, <https://statistik.arbeitsagentur.de/>; Bundesagentur für Arbeit, *Fachkräfteengpassanalyse*, Juni 2018.

First, it is important to note that the overviews above include both regulated and non-regulated professions. In fact, the majority of professions included in those overviews are non-regulated, thereby indicating that it is generally up to the employer to decide whether or not to employ a person with foreign qualifications. Furthermore, in this project, the focus was directed primarily to those regulated professions subject to the PQD's General System. Therefore, the first step was to filter out the regulated professions subject to the General System from the national/regional overviews. In this first step, attention was also paid to potential regional specificities. Where possible, the relevance of a certain profession to the territory of the Dutch border region was ensured.

Second, a matching exercise was conducted. The first step resulted in a national/regional list of General System regulated professions. In order to find matching professions between the different lists, use was made of the jobseeker wizard in the European Commission's Regulated Profession's Database.¹⁷ This allowed for the creation of one shortlist of highly demanded professions. In this shortlist, only professions mentioned on the national/regional lists of two or more Member States/regions were taken up.

Third, the ultimate selection of professions was made. In light of feasibility concerns, it was proposed to develop roadmaps and factsheets for a selection of three professions ideally located in the three sectors in which most highly demanded professions are located, namely the healthcare, social, and technical sectors. However, the shortlist revealed that there were only very few highly demanded General System regulated professions in the technical sector, as most of those professions are subject to the PQD's system for recognition on the basis of professional experience thereby being outside the scope of the project. For the social sector, no matching professions were found for the Netherlands, Belgium, and Germany. Nevertheless, the healthcare sector appeared to be in high demand.

To make the ultimate selection of three professions, additional labour market initiatives in the Dutch border region with Belgium and Germany were consulted. The initiatives consulted in the context of this study were the Benelux expert group on the transferability of qualifications (which has a list of highly demanded professions), the Interreg project Euregio Xperience focusing on stimulating young individuals to explore the cross-border labour market between the Netherlands and Germany,¹⁸ and the Euregio barometer indicating where opportunities lie for cross-border work.¹⁹ Whereas these initiatives primarily focused on professions requiring vocational education and training (VET) qualifications, the ones taken up on the shortlist were primarily professions following on higher education qualifications. In fact, the only VET-level shortlist profession was that of second level nurse. This profession was therefore included in the final selection. As far as the other two professions were concerned, the professions of physiotherapist and secondary school teacher were taken up in the final selection because of the fact that they are some of the most mobile professions in the EU according to the Commission's Regulated Professions Database.²⁰ The selected professions and their national translations are included below:

¹⁷ European Commission, 'Regulated Professions Database – Jobseeker Wizard', <http://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=homepage>.

¹⁸ Euregio Rhine-Meuse-North, 'Euregio Xperience', <http://euregio-rmn.de/projecten/euregio-xperience-2/>.

¹⁹ Ler(n)ende Euregio, Arbeidsmarktbarometer Euregio Rijn-Waal, <http://www.euregiobarometer.com/nl/>.

²⁰ European Commission, 'Ranking for establishment', http://ec.europa.eu/growth/tools-databases/regprof/index.cfm?action=stat_ranking&b_services=false.

1. Second level nurses
 - NL: Verzorgende IG
 - BE: Zorgkundige/Aide-soignant/Krankenpflegehelfer/in
 - DE (NRW & Nds.): (Kranken)Pflegeassistent/in
2. Physiotherapists
 - NL: Fysiotherapeut
 - BE: Kinesitherapeut/Kinéstherapeute/Physiotherapeut/in
 - DE: Physiotherapeut/in
3. Secondary school teachers
 - NL: leraar voortgezet onderwijs
 - BE: leraar secundair onderwijs/Professeur/enseignant de l'enseignement secondaire/Sekundarschullehrer/in
 - DE: Sekundarschullehrer/in

The full process regarding the selection of highly demanded professions was discussed extensively in the following report: H. Schneider & L. Kortese, [B-solutions “Roadmap and Factsheet for the Recognition of Qualifications for Highly Demanded Professions” – Step 1: Selecting Professions](#), ITEM Maastricht, October 2018.

3. Step 2 – Developing Roadmaps and Factsheets

Considering the selection of professions, the first line of action in developing the roadmaps and factsheets was for the project team to become familiar with the particularities of the profession by conducting a literature study to ascertain how the profession is regulated in the Member State/region concerned. The following step was to identify the competent authorities for the selected profession in the Member State/region concerned and to invite them for participation in the study.

In the case of secondary school teachers, six authorities could be identified in the Netherlands, the three Belgian Communities, North Rhine-Westphalia, and Lower Saxony. As far as second level nurses and physiotherapists were concerned, applications for recognition regarding these healthcare professions were all handled by the same authorities in the Member States/regions included in the project, meaning that another six authorities could be identified for these two professions. Therefore, the total number of competent authorities for the professions of secondary school teacher, physiotherapist, and second level nurse in the project territory is 12. In the end, 10 authorities agreed to take part in the study. An overview of the competent authorities that were interviewed in the context of the project is provided in the Annex. The illustration below provides for a visual representation of the location of the competent authorities.



Figure 1. Overview of Competent Authorities

Interviews were subsequently scheduled with the competent authorities taking part in the study. During the interviews, questions were asked about the recognition procedure in general and in relation to a specific profession, mobility flows, duration of the procedure, potential obstacles experienced by the authorities and by citizens, cooperation between Member States, and the link to the labour market. A selection of sample questions is included in the Annex. Questionnaires were specific to every authority and were employed as a secondary step to ask about data regarding the number of applications competent authorities received from individuals with Dutch, Belgian, or

German qualifications. The questionnaires were also used to ask any question remaining after the interview or to clarify any ambiguities.

After conclusion of the interview and questionnaire phase, the development of roadmaps and factsheets could commence. For this, the data from the interviews was analysed to decide which information should be taken up in the documents. The Annex includes a checklist of information that could be included in a roadmap and factsheet. In the end, the following documents were developed in the context of the project:

Document	Scope	For whom?	Information
Factsheet	All professions	Citizens & first line support services	<ul style="list-style-type: none"> – What is recognition and when is it necessary? – Who is the competent authority? – What are the most important aspects of the recognition procedure to take into account?
Roadmap	Profession-specific	First line support service	<ul style="list-style-type: none"> – Better informing citizens – Enhancing transparency of recognition procedures – Going beyond the information that is readily available.
Factsheet – Mobility to NL/BE/DE	Profession-specific	Citizens	

Table 2. Documents developed

At first it was proposed to create a roadmap and a factsheet per profession. The roadmap would be aimed at first line support services and the factsheet at citizens. However, the information to be communicated to citizens was found to be mostly general in nature (i.e. related to duration of the procedure, potential costs, importance of handing missing documentation over swiftly), meaning that it could also be relevant to persons seeking to exercise another regulated profession for which roadmaps and factsheets were not (yet) developed. Therefore, a general factsheet was developed to inform both citizens as well as first line support services of some basic considerations related to recognition. Furthermore, the general factsheet allows a first line support service provider or citizen to find out whether a profession is regulated (i.e. whether recognition is necessary) and provides the relevant national and European sources to find out who is the competent authority.

More specific information on the recognition procedure for second level nurses, physiotherapists, and secondary school teachers is subsequently provided in the roadmaps and profession-specific factsheets. Each profession has one roadmap and three factsheets. The roadmap again consists of a page providing general information about recognition and the profession followed by three “country pages” providing a step-by-step guide to not only gaining recognition, but also labour market access in the Netherlands, Belgium (i.e. the three Communities), and Germany (i.e. North Rhine-Westphalia and Lower Saxony).²¹ Therefore, depending on where the person concerned wants to exercise the

²¹ In some cases, recognition is merely one step to actually getting to work in another Member State. For some professions, persons may need a licence, registration or permit to be able to actually exercise the profession. For the professions included in this study this could, for example, be seen with physiotherapists. Persons

profession, the first line support service provider is able to provide information specific to that Member State or region. The profession-specific factsheet subsequently provides the same information as the roadmap but only for the Member State/region the individual wants to work in, thereby focusing on his/her particular mobility path.

In order to tune into the different languages relevant to the Dutch border region with Belgium and Germany, all roadmaps and factsheets are made available in Dutch, German, and French. The documents are also made available in English, as they may also be relevant to a person coming from another EU Member State to the Netherlands, Belgium (i.e. the three Communities), or Germany (i.e. North Rhine-Westphalia and Lower Saxony) to exercise one of the selected professions. Nevertheless, no specific information is provided in this case regarding the professional qualifications of the individual concerned, as such information is only provided for the Member States/regions included in the project.

All documents include hyperlinks to other relevant online information such as the websites of the competent authorities, application forms for recognition, the national assistance centres under PQD, and other relevant information. Of course, if a person acquires a paper version of the roadmaps and factsheets, hyperlinks cannot be accessed. Therefore, all documents include QR-codes that can be scanned with a mobile phone or tablet leading to the online version of the documents so that the hyperlinks can easily be accessed.

All language versions of the roadmaps and factsheets can be consulted on the [ITEM Cross-border Portal](#).

wanting to work in that profession need a *BIG-registratie* to work in the Netherlands, a *Visum* to work in Belgium, and a *Berufsurkunde/Erlaubnis* to work in Germany. In such cases, recognition is just one step to obtaining labour market access. After recognition has been obtained, a person may therefore need to apply for a licence/permit/registration and provide additional documentation. Examples thereof are certificates of good conduct and proof of language knowledge.

4. Project Findings

Several findings could be deduced from the overall implementation of the project as well as the interviews conducted. One of these findings concerns the identification of the correct authority. Some difficulties were experienced in this area by the project team when trying to identify the right competent authority to contact for participation in the study. For example, some of the information regarding the competent authority was found to be outdated, referring to the former person in charge of the topic. A best practice in Germany is the website anererkennung-in-deutschland.de guiding persons to the right competent authority for recognition.

Complexities related to the identification of the competent authority were also considered an obstacle for citizens by the competent authorities interviewed in the context of this study. In some cases, authorities also indicated that the identification of the correct authority in the context of the IMI-system was not straightforward. The IMI-system is used by authorities in the host Member State to communicate with home Member States to enquire about certain qualifications/professions. The system provides standard questions and translations in all EU languages. Whereas some authorities use the IMI-system structurally to enquire about a certain profession in the home Member State or to validate certain qualifications, others use it on a case-by-case basis depending on the dossier concerned. Generally, authorities view the IMI-system positively. One authority noted that if IMI works well, it is fantastic. That being said, criticism regarding the IMI-system mostly concerns the fact that sample questions are provided (meaning it can feel constraining in terms of communication) and the fact that not all competent authorities in all EU Member States use the IMI-system similarly (i.e. some do not reply to questions asked). In terms of the sample questions, these sometimes do not result in the host Member State authority acquiring the necessary information or in ambiguous answers. In such a case, it may be necessary to have an information exchange outside the IMI-system. An obstacle occurring in the case an authority needs to ask for more information either at competent authority in another Member State or from an expert organisation in the same Member State may be that responses take ample time.

As far as the European Professional Card (EPC) is concerned, it is available for one of the professions included in this study, namely physiotherapists. The EPC is an EU-level tool that, among others, speeds up the recognition procedure. The EPC functions via the IMI-system. From the interviews, it became apparent that there are not yet large amounts of applications for the EPC. Whereas authorities from the Flemish and French Communities in Belgium and from the Netherlands indicated to receive such applications, authorities from North Rhine-Westphalia and the German-speaking Community appeared to not (yet) receive such applications.

In terms of cooperation with other Member State competent authorities, this appears to only occur on a structural basis when there is a direct need and only bilaterally (e.g. when there is substantial mobility between two Member States). In the case of physiotherapists and second level nurses, authorities in the Netherlands and North Rhine-Westphalia indicated that if there is cooperation among authorities, this usually takes place for doctors. Despite the fact that structural exchanges generally do not yet take place between authorities in different countries, some interviewed authorities viewed the possibility positively and saw it as an opportunity to gain better information,

speed up administrative processes, and learn about different approaches. By contrast, others did not see a need for such exchanges.

As far as the overall procedure is concerned, some authorities provide for the possibility to hand in applications electronically whereas others maintain traditional procedures through which applications must be sent by post. In North Rhine-Westphalia work is being done to establish a *Dokumentenverwaltungssystem* in order for the procedures to be electronic for healthcare professions. The system would first become available for automatic recognition professions and later potentially also be relevant for other healthcare professions. One authority indicated that the difficulty with having individuals send their documentation by mail is that individuals will not always use PDFs to send the documents, instead sending mobile phone pictures rendering the documentation illegible.

Difficulties related to documentation appear to be one of the major obstacles encountered by competent authorities, especially when documentation is incomplete. Most authorities also indicated that the most important factor to speed up a recognition procedure is completeness of the dossier. Authorities that indicated to mostly receive complete applications either provide the possibility for applicants to get in touch beforehand (thus discussing the different documents needed) or otherwise provided more information on the procedure and the documentation required. In terms of the information missing, there does not appear to be one specific document that is found lacking. Examples of missing information include translations, evidence of professional experience, and sufficient detail about the qualifications of the person concerned. In this case, a particular complexity between the Netherlands and Germany (North Rhine-Westphalia) is that the latter Member State region requires information about the number of hours spent studying a certain subject. Whereas such information is made available in Germany to graduates, this is not the case for the Netherlands where the focus is placed on competences. The number of hours are used as an estimate to be able to determine the depth of certain knowledge and if not available, sufficient information could, for example, be extracted from the study guides (however, these must be made available to the authority in North Rhine-Westphalia).

In terms of obstacles, authorities confirm that the procedures can be difficult to understand for citizens. However, a different challenge is that individuals do not always appear to be aware (at all) of recognition procedures and their necessity (despite the availability of information). Furthermore, individuals are not always aware of the information available. Whereas one authority therefore started to organise information sessions to guide people through the procedure, others have ensured that there is contact with potential applicants beforehand to ensure that they apply for the right procedure. In Belgium, it can furthermore be difficult for applicants to understand the difference between professional and academic recognition and when they may need which one.²² Another challenge relates to the high expectations of citizens. One interviewee explained:

²² In some cases, an academic recognition or equivalence procedure can provide an alternative to a recognition procedure under the Professional Qualifications Directive.

[...] sometimes they think “it is the European Union, I have a European diploma so I can practice directly, there is no need to have a document”. Often they don't understand “why do I still have to take extra steps” and when they have compensation measures they don't understand... “but I have a European diploma” [...]

As far as the costs of recognition procedures are concerned, the procedures are mostly free (for eight out of 10 of the interviewed authorities). In the case that fees are required, they are between 65 and 350 euros.²³ However, there may still be a need for certified translations which can significantly increase costs related to the recognition procedure. Nevertheless, in the border region of the Netherlands with Belgium and Germany, certified translations are mostly not necessary, as documents tend to be accepted in multiple languages.²⁴ Nevertheless, when it came to procedural costs, one authority contemplated that although no costs are currently connected to the recognition procedure, there should perhaps be some in order to ensure that applicants take the procedures seriously. Some authorities receive applications for recognition from individuals who are not qualified to exercise the profession in the home Member State. One representative of a competent authority for recognition of healthcare professions recalled an application of an animal caretaker looking for recognition as a psychotherapist to provide such services to animals. In this respect, another authority noted that, in light of the relevant EU legislation (i.e. the Professional Qualifications Directive), the idea is always that of a professional moving from one Member State to another to exercise the profession. However, applications may also be received from individuals that are not qualified and can therefore not be considered professionals in light of the relevant Directive. In this context, rejections only appear to occur when individuals apply for recognition in a profession for which they are not qualified. Some authorities receive applications from individuals that are not yet fully qualified professionals (mostly in the case of teachers). In that case, those individuals will need to qualify first as teacher (whether in the home or host Member State) before it is possible to either acquire recognition or work as a secondary school teacher.

When focusing on the treatment of dossiers, it became clear that there is a difference in the actor that evaluates the dossiers depending on the profession. Whereas applications for recognition of secondary school teachers are mostly assessed by the competent authorities themselves, this is not the case for second level nurses and physiotherapists. In that case, almost all authorities work with an expert commission consisting of practitioners who convene regularly (generally every three months) to assess the dossiers and issue an advice to the national minister of health who ultimately takes a decision. In the French Community, such a commission also exists for the profession of teacher. In the Netherlands and in the French Community in Belgium applicants furthermore have a possibility to be invited to the expert commission's meeting to provide additional information and explication of their qualifications and experience. Of the competent authorities responsible for physiotherapists and

²³ Possible costs for recognition procedures in North Rhine-Westphalia range between 150 to 350 euros. These are pre-determined fees. Nevertheless, in relation to the Netherlands these costs are usually at the lower range of the spectrum.

²⁴ In the /Netherlands in NL/FR/DE/EN for second level nurses and physiotherapists. For teachers in the Netherlands in NL/DE/EN. In Belgium for second level nurses and physiotherapists in NL/DE/FR and for teachers in NL/DE/FR/EN. In North Rhine-Westphalia in DE/EN for physiotherapists and second level nurses and in DE for secondary school teachers. In Lower Saxony for when documentation is not in DE for the professions of secondary school teacher, second level nurse, and physiotherapist.

second level nurses, the authority in North Rhine-Westphalia assesses qualifications for the professions of second level nurse and physiotherapist itself.

When evaluating professional qualifications, some authorities may receive several applications from individuals with the same qualifications. Here, the question is often whether similar qualifications that have already been assessed before could not be recognised more quickly due to the fact that they were already assessed in-depth. From the interviews, it appears that this occurs in practice. For example, the North Rhine-Westphalian authority has extensive experience with Dutch physiotherapy diplomas, as German students in the border region often attend physiotherapy training in the Netherlands before returning to Germany to exercise the profession. Therefore, they are very familiar with those qualifications knowing the educational institutions they come from. They are in direct contact with these educational institutions, meaning that if something changes in the documents the authority will be informed of such changes. This cooperation ensures that recognition can take place quicker (within one month). A similar facilitated recognition exists for Dutch *Verzorgenden IG* seeking to work as *Altenpflegehelfer/in* in North Rhine-Westphalia. This means that for Dutch degrees concerning these professions there is very little substantive evaluation. Checks are merely conducted to ascertain whether the diploma has been obtained and to see whether something has changed in respect of the qualifications assessed before. Such an approach is also adopted by the Dutch authority for physiotherapists. They have seen multiple similar diplomas from Belgium meaning these can be recognised easily and do not need to be assessed on content anymore. Similar approaches are maintained by the competent authority in the Flemish Community for the profession of second level nurse. In this case, their familiarity with the Dutch qualification of *Verzorgende IG* ensures that these degrees can be more easily recognised as *Zorgkundige*.

However, such examples of “jurisprudence” ensuring that qualifications can be recognised quicker when an authority is familiar with them do not occur in the case of the teacher profession. Here, all authorities indicate that qualifications are subject to a case-by-case analysis. In this case, most authorities focus on the teaching qualification in the home Member State (i.e. the subjects a person may teach and the age categories one can work with). Rejections in the area of the teaching profession can occur when a person applies for recognition in a subject that does not exist in the host Member State. Individuals themselves have to indicate the subjects they want to teach. The authorities will subsequently assess which national qualification “fits best” with the foreign one. Multiple authorities note that it can be very difficult to ascertain which subjects are actually offered in the host Member State, what the education system looks like, and what functions exist under the national/regional education system. The complexity of the field of education as well as the differences existing in teaching professions between Member States mean that establishing jurisprudence for this profession is very difficult. One authority noted that, even if they know a certain qualification, they still need to assess what an individual has done in terms of subjects. A complexity in this respect in the Dutch border region with Belgium and Germany is that in the Netherlands individuals will qualify in one subject. Therefore, upon qualification they will be a maths teacher, English teacher, history teacher etc. In Belgium and in Germany, individuals qualify in multiple subjects (e.g. they are a secondary school teacher in maths and physics). The Dutch competent authority for teachers nevertheless does recognise multiple subjects in case a person with teaching qualifications comes from a Member State where it is possible to be qualified in multiple subjects. However, the difference in the number of subjects secondary school teachers may teach also means that Dutch graduates going to North Rhine-

Westphalia will usually need to complete compensation measures to become qualified in a second subject. In Belgium, authorities will partially recognise qualifications in one subject.

It furthermore became apparent that in relation to compensation measures adaptation periods are mostly used (instead of aptitude tests). Several authorities recommend to take an adaptation period because a person is able to easily “roll into the system” and can get to know a potential future employer through an adaptation period. In the case of a secondary school teacher going to North Rhine-Westphalia or Lower Saxony aptitude tests are not recommended, especially not for persons who have limited professional experience. If, in the end, the test is not successfully completed, it is impossible to obtain recognition in the whole of Germany. Another authority indicated that aptitude tests are expensive to organise. In the case of that authority, they only saw one person apply for such a test.

As far as the adaptation periods are concerned, these are organised differently. Whereas some authorities establish compensation measures differently for each individual case, others have modules or fixed domains, which are required depending on the knowledge a person is lacking. Adaptation periods can be provided at different institutions. For example, North Rhine-Westphalia has specific establishments for compensation measures and in the Netherlands, other Member State physiotherapists are referred to the internship coordinators of universities of applied sciences to initiate the adaptation period. In the Netherlands (for physiotherapists) and in North Rhine-Westphalia (for secondary school teachers) possible abbreviations of the compensation measures can be discussed if the person is progressing quicker than expected. However, the periods may also be lengthened if the required level of knowledge is not yet achieved. The duration of compensation measures differs and can take up to three years under the Professional Qualifications Directive. However, according to the authorities interviewed three years is hardly applied (at least for qualifications in the Dutch border region with Belgium and Germany). Although different per profession, compensation measures appear to mostly range from six to 18 months.

Compensation measures are said to be discouraging of mobility and can indeed be. Nevertheless, authorities indicate that while there are cases where they do not receive anymore information from an individual after compensation measures were imposed, a lot of applicants do end up completing such measures. Only the Dutch authority for second level nurses notes compensation measures are often not completed by persons with Belgian qualifications looking to exercise the profession of *Verzorgende IG*. In some cases, individuals will wait some time before commencing compensation measures. At the same time, authorities indicate that direct recognitions (i.e. without application of compensation measures) are not uncommon. As a rule, compensation measures may only be applied if there are substantial differences. In the border region of the Netherlands with Belgium and Germany, such differences can occur for certain professions. For example, the profession of second level nurse is organised differently between Member States (not only in this border region, but throughout the EU) and can therefore be difficult to recognise. In some countries, that profession is not regulated, training differs, or even the whole profession differs. On a more general level, a difference between the Netherlands and Germany is that German degrees are more specialised than Dutch degrees are, meaning that professionals need to become more diversified in the Netherlands or more specialised in Germany.

As far as labour market access is concerned, this can be a separate step. In the case of the profession of secondary school teacher, recognition directly provides for labour market access. In the case of the profession of second level nurse, recognition only equals access in the Netherlands. This means that for the profession of second level nurse in Belgium and in Germany and for the profession of physiotherapist in the Netherlands, Belgium, and Germany there are additional steps to be completed to acquire labour market access. In North Rhine-Westphalia, the distinction between recognition at one authority and a *Berufsurkunde/Erlaubnis* at another was considered an obstacle for individuals and something that could be hard to comprehend. In the Netherlands, physiotherapists need to obtain a BIG-registration after recognition. In Belgium, a *Visum* issued by the federal public service for health is required. Nevertheless, it follows automatically on recognition and does not entail any additional steps for the applicant. Even if in Belgium recognition is applied for at one Belgian Community's competent authority, once recognition is granted it is valid for the whole of Belgium. The same applies for the *Visum*, meaning individuals can exercise the profession in any of the three Communities.

In order to acquire labour market access it may be necessary to provide proof of language knowledge. However, this is not required in all Member States/regions taken up in this study. Whereas in North Rhine-Westphalia for physiotherapists and second level nurses language knowledge is evaluated by the *Gesundheitsämter* (i.e. the organisations providing labour market access via the *Berufsurkunde/Erlaubnis*), an evaluation of language knowledge for secondary school teachers is left to the employer. In the Netherlands, this is the same for the profession of secondary school teacher and second level nurse. By contrast, physiotherapists need to provide proof of their language knowledge before being able to obtain labour market access (i.e. a BIG-registration). In Belgium, language knowledge for the professions of physiotherapist and second level nurse is left to the employer. In the case of secondary school teachers, there are different ways of evaluating language knowledge depending on the Community a person is looking to work in.

A topic related to labour market access is partial access. Under the Professional Qualifications Directive it is possible to provide such access on a case-by-case basis if a person was already qualified in the home Member State, if no compensation measures can be imposed and a person would have to follow an entire programme of training, and the activities to be carried out can be objectively separated from the rest of the profession.²⁵ In relation to partial access, authorities indicate that it has either not been granted because there has not yet been a situation in which it could be applied or indicate that it is not applied due to the second criterion in the directive (i.e. a full programme of training must be imposed instead of compensation measures). Other issues related to the exercise of the profession relate to cultural differences, differences in pay between Member States for the same profession, and the fact that there may be shortages of the same professions in neighbouring Member States.

When it comes to the duration of the procedure authorities indicate that they either maintain the time limits laid down in the Directive or are able to provide for recognition within those time limits. In the event that an authority works with an expert commission who assesses dossiers, the speed of a recognition procedure can depend on when a meeting is scheduled. For example, if a full dossier is handed in two days before a commission meeting and there is equivalence of qualifications, the

²⁵ Article 4f Professional Qualifications Directive.

procedure can be very quick. Issues that slow down a procedure again relate to incomplete documentation or insufficient information received by an authority in another Member State. In terms of further speeding up the procedures, several authorities indicated that there are limitations in terms of available staff.

Several authorities furthermore indicate that it is unclear what individuals do after recognition is granted (i.e. it is not known where applicants “end up”). Furthermore, it is not always clear whether a person applies for recognition because they are already in the Member State/region concerned and have already found employment or whether they are perhaps still abroad and applying for recognition in order to be prepared when they arrive in the Member State/region concerned. Although authorities do not always know the purpose for which a person is requiring recognition (i.e. already found employment or before commencing the search for employment), both scenarios occur.

In some cases, it is possible to acquire work experience in a particular profession without recognition. In Belgium, this can be the case in relation to the profession of secondary school teacher if there are shortages. It is not possible to work without recognition in the professions of physiotherapist and second level nurse. By contrast, in the Netherlands it is possible to work in these professions without recognition by working under the supervision of a qualified physiotherapist or (second level) nurse. In this case, the position is similar to that of a student following an internship during their studies. Individuals doing so, may therefore not call themselves physiotherapist or second level nurse, this is only possible after the BIG registration (physiotherapist) or recognition (second level nurse). In North Rhine-Westphalia, it is possible to work without recognition as *Vertretungslehrer*. In this case, a person will carry out the same activities as a teacher. However, working in this capacity has consequences for the level of pay and position.

Finally, in terms of the number of applications, it is striking that there are not many. An overview of the number of applications received by the competent authorities can be found in the Annex. That overview shows that the highest number of applications was received by the Dutch competent authority for the profession of secondary school teacher with 137 applicants coming from Belgium. By contrast, the French Community received no applications from the Netherlands for the professions of second level nurse and physiotherapist. The German-speaking community also received no applications for the profession of second level nurse from the Netherlands. In this case, this development is due to the fact that since the sixth state reform in 2016 the competences regarding recognition in Belgium moved from the federal level to the level of the Communities. In the case of healthcare professions, the recognition procedure must therefore be lodged with an authority in one of the three Communities. The *Visum* (i.e. the authorisation to work in the profession) is granted at the federal level, meaning that after recognition in one Community, persons are able to work throughout the whole of Belgium. In the case of healthcare professionals, individuals are advised to apply for recognition in the Community which has the same language as the individuals’ qualifications. Therefore, qualifications from the Netherlands are directed towards the Flemish Community, thus explaining a lack of applications in the other two Communities.

5. Conclusions & Recommendations

Over the course of this report the approach and findings of the B-solutions project “roadmap and factsheet for the recognition of qualifications for highly demanded professions” were presented. Section 2 showed the process for selecting highly demanded professions. Section 3 showed the approach adopted in the context of this project to develop the first roadmaps and factsheets. Finally, Section 4 provided general findings from the project and the interviews conducted with the competent authorities in the border region of the Netherlands with Belgium (i.e. the three Communities) and Germany (i.e. North Rhine-Westphalia and Lower Saxony).

In terms of cooperation, the IMI-system can be considered a best practice, as it allows communication to take place between competent authorities quickly. However, the interviews also show that more can be done to ensure that competent authorities throughout the EU use the IMI-system in a similar manner. Cooperation of competent authorities should be encouraged for Member States experiencing enhanced mobility flows, as they may lead to a better understanding of the respective qualifications and of improved administrative processes. Another best practice is when authorities maintain a certain “jurisprudence” for qualifications they have evaluated before. In such a case, qualifications the authority is familiar with are not analysed in-depth anymore, thereby ensuring that the recognition procedure can be accelerated. Partial recognitions granted in the case of teachers are also a best practice to overcome complexities related to the differences in the national education systems and teaching professions. The interviews also provided insight into a much-cited complaint related to recognition, namely that costs are high. In particular, the interviews showed that recognition procedures are mostly free of costs and that in the border region of the Netherlands with Belgium and Germany certified translations are often not necessary as documents are accepted in multiple languages. Nevertheless, in those limited cases where certified translations are still necessary, they may significantly increase potential costs related to the procedure. Therefore, issuing diplomas, certificates, and supplements related to them in multiple languages could take away the need for such translations beforehand. Another recommendation in terms of information provision is to provide more information about the availability of the European Professional Card for physiotherapists, as there are not yet many applications making use of that possibility. Furthermore, the interviews have shown that information provision to potential applicants can still be improved, as awareness of recognition procedures and the available information surrounding them is still low.

The roadmaps and factsheets developed in the context of this B-solutions project seek to tune into this need to further improve information provision on recognition. In the future, roadmaps and factsheets could also be developed for other professions, thereby enhancing transparency regarding the recognition procedure for other professions as well. However, roadmaps and factsheets provide a flexible tool that can be adopted to different mobility paths throughout the EU, meaning that they can be developed for any combination of Member States experiencing increased mobility in a particular profession. Therefore, roadmaps and factsheets could play a role in improving the recognition of qualifications ultimately contributing to enhanced cross-border mobility and employment.

6. Annex

6.1 Overview of Competent Authorities interviewed

Profession	Member State/Region	Competent Authority
Second level nurse & Physiotherapist	NL	CIBG
	BE – Flemish Community	Agentschap Zorg en Gezondheid
	BE – French Community	Fédération Wallonie-Bruxelles
	BE – German-speaking Community	Ministerium der Deutschsprachigen Gemeinschaft
	DE – North Rhine-Westphalia	Bezirksregierung Düsseldorf
Secondary school teacher	NL	Dienst Uitvoering Onderwijs (DUO)
	BE – Flemish Community	Agentschap voor onderwijstdiensten (AgODi)
	BE – French Community	Fédération Wallonie-Bruxelles
	BE – German-speaking Community	Ministerium der Deutschsprachigen Gemeinschaft
	DE – North Rhine-Westphalia	Bezirksregierung Arnsberg

6.2 Sample Interview Questions

General questions on the recognition procedure

1. In general, what does a recognition procedure look like for the designated profession?
2. How are qualifications assessed in light of national/regional standards on the profession?
3. Is each diploma/qualification part of an individual assessment?
4. What is the role of professional experience during the recognition procedure?
5. What are the possible results of a recognition procedure under the PQD? Do rejections occur? If so, on what grounds?
6. Do individuals submit the application electronically?
7. How much does a recognition procedure cost?

Mobility flows

8. Which countries do most applications originate from?
9. How many applications are received from the Netherlands/Belgium/Germany?

Specific questions regarding recognition for a particular profession

10. Are there cases of direct recognition (i.e. without compensation measures)? Do these occur often for individuals with Dutch/Belgian/German qualifications?
11. On the basis of what differences are compensation measures imposed?
12. Are compensation measures determined on a case-by-case basis and what do they look like? How long do they take?
13. Do applicants discontinue the recognition process when compensation measures are imposed?

Duration of the procedure

14. How long does a recognition procedure take on average?
15. What are the factors that speed up an application and which factors delay an application?

Obstacles

16. What obstacles do you, as a competent authority, encounter in the recognition process?
17. As a competent authority, what do you consider to be the difficulties faced by applicants?

Cooperation

18. How do you cooperate with other EU countries in the context of the recognition of qualifications?
19. Is the IMI-System used? If so, what are your experiences?

Connection to the labour market

20. Do you receive applications of individuals who are in search of employment? Or do you mostly receive applications where the person has already found employment, thus needing recognition for a specific job?
21. Are there any other conditions for accessing the profession (apart from recognition)?
22. Is language knowledge evaluated? If so, how?

6.3 Checklist Roadmaps & Factsheets

The table below provides a checklist with suggested information to be included in a roadmap or factsheet. This is a non-exhaustive overview, as any relevant information regarding a recognition procedure and labour market access procedure can be added to further enhance transparency of the recognition and labour market access procedure for the profession at hand.

Topic	Included
General information on recognition	
What to do if a person does not have a diploma or other qualification to work in the profession at hand	
Possibilities to work in the profession when recognition/labour market access has not (yet) been granted	
Who is the competent authority and what is the contact information	
A link to the application form	
Information on who assesses the qualification (e.g. the authority itself or perhaps an expert commission)	
The criteria or legislation against which the foreign qualifications are assessed	
Possible results of the recognition procedure	
Specifications about what compensation measures look like and how a person may initiate such measures	
Information on frequently experienced substantial differences leading to an application of compensation measures	
Information on the additional documentation /steps required for labour market access and where to acquire such documentation/how to fulfil such steps	
Information on the costs of the recognition procedure and possible additional related costs (e.g. certified translations, certificate of good conduct).	

6.4 Overview Number of Applications for Recognition

Please note that the number of applications provided below has been included merely for informational purposes. Therefore, how the data is recorded may have differed depending on the competent authority concerned.

Profession	Member State/Region	Number of Applications & Origin
Second level nurse	NL	Around 5 annually from Belgium 3-5 annually from Germany
	BE – Flemish Community	No information available
	BE – French Community	0 from the Netherlands since 2016
	BE – German-speaking Community	0
	DE – North Rhine-Westphalia	1 from the Netherlands in 2018
Physiotherapist	NL	Around 5 annually from Germany 20-30 annually from Belgium
	BE – Flemish Community	0 from the Netherlands since 2016
	BE – French Community	No information available
	BE – German-speaking Community	3 from the Netherlands
	DE – North Rhine-Westphalia	79 from the Netherlands in 2018
Secondary school teacher	NL	The Dutch competent authority distinguishes between applications (i.e. number of subjects a person wants to teach) and applicants (i.e. persons submitting applications). One person can therefore submit multiple applications. 137 applicants with 366 applications from Belgium in 2018 28 applicants with 94 applications from Germany in 2018
	BE – Flemish Community	85 annually from the Netherlands (both secondary school teachers and primary school teachers)
	BE – French Community	In the period 2015-2019 the competent authority received 1 application from the Netherlands
	BE – German-speaking Community	Between 2-5 annually from the Netherlands and from Germany
	DE – North Rhine-Westphalia	Around 19 annually from the Netherlands, around 9 annually from Belgium



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Institute for Transnational and Euregional
cross border cooperation and Mobility / ITEM

Mailing address:

Postbus 616, 6200 MD Maastricht, The Netherlands

Visitors:

Bouillonstraat 1-3, 6211 LH Maastricht, The Netherlands

Avenue Céramique 50, 6221 KV Maastricht, The Netherlands

T: 0031 (0) 43 388 32 33

E: item@maastrichtuniversity.nl

www.twitter.com/ITEM_UM

www.itemcrossborderportal.maastrichtuniversity.nl



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