

Public Consultation on the Recognition of Professional Qualifications Directive

Response of the European Network for Accreditation of Engineering Education

The European Network for Accreditation of Engineering Education (ENAE) is a not-for-profit association of organisations concerned with the quality assurance and accreditation of engineering higher education. Its main objectives are to promote and coordinate national accreditation agencies and analogous bodies and to run a pan-European de-centralized system of accreditation of engineering education which leads to pan-European recognition of national accreditations (consistent with the objectives of quality, transparency, recognition and mobility of the Bologna Process).

Many of the questions in the consultation deal with matters which only competent authorities and professional associations are placed to answer. However, there are some issues in the Directive to which the work of ENAE and its EUR-ACE label recognition system are relevant. These are dealt with in the following comments.

General comment: Use of meta - frameworks

Since the adoption of the current Directive in 2005 there has been significant success in producing meta-frameworks for qualifications of which the Bologna Process and the European Qualifications Framework are major examples. There are also some frameworks which have been developed specifically for professional sectors . the EUR-ACE Framework for engineering higher education is an example. It is the view of ENAE that consideration should be given to how these frameworks can be used to provide greater clarity in the Directive drafting and in its implementation.

An obvious place in which greater clarity would be achieved is in the level definitions in Article 11 of Directive 2005/36. Currently duration is the defining parameter and this can lead to some difficulties of interpretation as there is no explicit link to academic level. Adding the EQF level number to each underpinning education description in Article 11 would give greater certainty. The EQF reference would in turn place the professional levels in a Bologna context and relate to professional sector frameworks such as EUR-ACE.

Compensation measures (Q4-6)

Because a large number on states come under the Directive it is inevitable that the fit between national professional criteria will not be perfect. Hence a system of compensation measures is required (with effective monitoring and enforcement to prevent it being used as means of protectionism). When assessing qualifications competent authorities should be encouraged to take professional accreditation into account, especially where there is a pan-European framework (eg EUR-ACE). This will assist them in relating qualifications to national standards and should reduce the incidence of excessive compensation measures.

Graduate mobility (Q7)

ENAE supports graduate mobility and professional accreditation and the EUR-ACE recognition system is designed to facilitate it. Qualifications are nationally accredited, and hence may carry a EUR-ACE label, on the basis that they are qualifications suitable for initial entry to the engineering profession. Although the graduates may need to develop further competences before being granted professional registration.

Regulated education (Q10)

In any defining of regulated education+professional accreditation, especially when undertaken within a pan-European framework has to be taken into account. However, note that it is the general view of the engineering profession that the ability to practise as a competent engineer requires more than graduation from an academic programme, ie periods of experience and/or professional competences assessment is also required, either during the studies or after graduation.

Professional card (Q11-14)

If professional cards are introduced then the procedures which national/European organisations have to carry out to validate a card applicants qualifications will be facilitated by relating them to European meta-frameworks, in particular where a professional sector has agreed an overarching standard, eg the EUR-ACE system in engineering sector.

European curricula (Q15)

It is not clear to ENAE that agreement on a European curriculum+is more likely to be attained than agreement on a common platform+. However, if this route is to be considered then existing pan-European education recognition systems such as the EUR-ACE framework provides a model, at least for the academic qualifications part of a European curriculum+. ENAE experience is that, despite the suggested name, European curricula+ would have to be defined in terms of outcome statements (not by defining syllabi) to have any hope of agreement.

CPD (Q27)

CPD is an important element of professional life and the expectation that it is undertaken underpins professional registration. But how it is defined, how it is monitored and how it is enforced is subject to much debate within and across professions. Hence great care will be needed in drafting any reference to CPD within the Directive.

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