

## **Evaluating the Professional Qualifications Directive, Experience report on the teaching profession**

As the Competent Authority for the Teaching Profession in Sweden, the Swedish National Agency for Higher Education hereby shares our experience on the questions relevant to the recognition of teachers under the general system of the Directive.

### **A. Recognition procedure in case of migration on a permanent basis**

1. The Agency does not have a system for applying for recognition on line. When an applicant sends her/his request for recognition via email, we reply that he/she has to send in the application and documents via ordinary mail. The reason for this is that we demand certified copies of the applicants' documents and a signed application form. In order to obtain certified copies, the applicant will have to show the original documents and copies to an official (e.g. the Swedish Employment Service office, personnel department at the school), who through his/her signature will endorse that the copies are true.

We do not receive many requests via email and in our experience there are few complaints about having to supply the application and documents in paper, since this is explained on our website.

2. The policy of our Agency is to recognise teachers regardless of citizenship. We thereby apply the same criteria to applicants with a teacher qualification from a third country that we do for EU citizens with a teacher qualification obtained within EU. The only difference is that non EU citizens with a teacher qualification from outside EU do not get the possibility to choose an aptitude test as compensation measure.

In the case of Article 3(3) we do not make any difference between these applicants and other EU-citizens with a qualification from within EU. We receive very few applications of this sort.

3. The education levels of Article 11 are included in the regulation of the Swedish National Agency for Higher Education regarding recognition of teacher qualifications from outside of Sweden. Hence we make use of them.

However, to our experience the format of the education levels, along with Annex II, are quite complicated to apply in the recognition process. We are not entirely sure of how useful they are, especially since a major difference in the educational level is allowed where a four year university educational programme is to be treated equally to a one year educational programme at post-secondary level. This raises the general issue whether educational programmes with such a vast disparity regarding educational levels, which according to the Directive are to be recognised, indeed can prepare the student for a comparable level of responsibilities and functions.

*An example is that since the “Staatlich anerkannte/r Erzieher/in” from Germany is included in Annex II, we recognise this German qualification of a three year secondary/post-secondary educational programme as a “Förskollärare” (Pre-school teacher), although the education required in Sweden for a “Förskollärare” is a three and a half year teacher educational programme at a higher education institution (university or university college). This is an issue since a person with the Swedish three year secondary-level “Child and Recreation Programme” is not eligible to be appointed as a “Förskollärare”. In conclusion, we find it a delicate task to judge whether educational programmes can prepare for a comparable level of responsibilities and functions or not, when there is such a substantial difference in the educational levels.*

We would welcome a simplification of the recognition process. We also question why Annex II does not include educational programmes from all countries.

4. We do not often encounter the situation of a professional from a Member State where the profession is not regulated and where the person does not have two years of working experience. In such cases, we make sure that the person is qualified to work as a teacher in the county where he/she was educated. Provided he/she meets this criterion, we will evaluate and assess the content of the education and compare with our teacher education programme, resulting in recognition as a qualified teacher directly or after compensation measures.

In accordance with the Directive, in case of the person holding a qualification from a regulated education and training, we do not require any work experience, and the applicant is treated as if it was a regulated profession in the Member State. However, we have difficulties in identifying what is a regulated education and training and would need tools in order to determine this.

5. Our experience on partial access to the teaching profession is that in cases when it is favourable for the applicant, we are able to grant him/her partial access to the teaching profession in Sweden. This applies e.g. for applicants who has the right to teach only *one* subject in upper secondary school in another EU country, and therefore may be granted the right to teach this subject in Swedish upper secondary school, although the Swedish corresponding qualification requires two teaching subjects.

### **C. Temporary mobility (of a self-employed or an employed worker)**

Since access to the teaching profession on a temporary basis is not regulated in Sweden, we are not involved as a Competent Authority and therefore do not have any statistical data on the number of EU citizens working as teachers on a temporary basis.

### **D. Administrative Cooperation**

12. Administrative cooperation (as outlined in Article 8, 50 and 56 of the Directive) is of uttermost importance and it greatly simplifies procedures for the migrant professionals to have access to the regulated profession. It is still difficult to receive information from a few countries, but IMI and the role of the designated coordinators has considerably improved the situation regarding upper secondary school teachers. We look forward to having all categories of teachers, and not just upper secondary school teachers, included in IMI.

We would also welcome a continuously updated central register with contact details of the competent authority for the teaching profession in each Member State. In Member States with a federal/regional structure a list of the competent authority in each federated or regional State should be included.

13. Yes, we are registered with IMI. We use IMI when we have questions regarding a particular applicant's teacher education programme. Mostly the questions concern what rights the applicant has to pursue the teaching profession, and in which subjects and grades, in the home Member State. We benefit greatly from the efficient way of obtaining answers through IMI, but regret that it is limited to the category of upper secondary school teacher. We would like to see IMI being extended to include all categories of teachers.

14. We do not see any major benefit of a professional card (as defined in Recital 32). As a Competent Authority, a professional card would need to be issued by the competent authority in the home Member State in order to form the basis for recognition. If the function of such a card should have any value after it has been issued, there would rather need to be a website where up to date information would be registered regarding the individual teacher's present status.

### **E. Other observations**

15. The necessary language skills are checked in connection with the application process and it is not possible to obtain the qualified teacher status certificate until the applicant has the adequate skills in the Swedish language.

There are various means by which the applicant can show that he/she has these skills, e.g. to present a certificate from a course of Swedish as a second language from the

adult education at upper-secondary level or the equivalent. If the applicant already is proficient in Swedish, he/she can take TISUS, a language test given by universities in Sweden proving Swedish language proficiency for university studies. Otherwise he/she can improve the Swedish language skills through courses in higher education or in adult education. It is also possible to take an "individual test" within the adult education to show proficiency in Swedish without completing the upper-secondary school course.

However, in the new Education Act, there is provision for teachers to obtain a permanent teaching position in some bilingual schools without fulfilling the above mentioned Swedish language requirements.

The complaints or comments received regarding the level of language skills has mostly been from the organisers of the adaptation period and the aptitude test. They are concerned about the applicants having the language skills that are needed in order to exercise their profession as teachers. To have passed the upper-secondary school course in Swedish language does not necessarily show whether the applicant has the skills needed for the teaching profession.

16. We have the following observations related both to administrative cooperation as well as recognition procedure in case of migration on a permanent basis.

*The Swedish Competent Authority for the Teaching Profession, receives complaints from citizens with Swedish formal teaching qualifications that a few countries, e.g. Greece and Italy, still have procedures for recognition and access to the teaching profession that are far from simple, and rather have regulations and systems that almost makes it impossible to gain access to the teaching profession in the host country. This may be the case despite the fact that we have provided all necessary information to the Competent Authority in the host Member State, and also stated in a separate certificate, that a person who satisfies the conditions of training required to access the profession in the home Member State thereby has evidence of formal qualifications covered by the Directive.*

*Also, we receive reports where recognition has been granted, but there are still hindrances at a formal level to obtain access to the teaching profession. These reports are from Swedish teachers having been recognised e.g. in Germany and Greece, but still not having access to the profession in practice since there is no overall grade point average given in the Swedish teacher education programme (until recently). Without a grade point average, you may be excluded from the competition for teaching positions in these countries. We see this as a formal hindrance to exercise the profession.*