



ARCHITECTS' COUNCIL OF EUROPE  
CONSEIL DES ARCHITECTES D'EUROPE

Ref: 019/06/AJ/dd  
Date 25<sup>th</sup> January 2006

---

## Access to the Profession

---

Commission Staff Working Document on European Qualifications Framework (EQF)

---

ACE Position Paper

---

Version of January 2006

---

### Introduction

The Architects' Council of Europe (ACE) is the representative Organisation for the architectural profession in Europe. Its Membership consists of the regulatory and representative professional bodies in all EU Member States, Accession States, Norway and Switzerland. As such the ACE represents, through its Member Organisations, about 450,000 practising architects.

Among the main themes on which the ACE works is the question of Qualifications and Access to the Profession. It is therefore of interest to the ACE to read the Commission Staff Working Document - Ref.: SEC(2005)957 entitled "Towards a European Qualifications Framework for lifelong learning". The subject of life long learning and the manner in which a qualified architect maintains his or her skills throughout their professional life is a matter of particular relevance to the ACE.

This paper sets out the initial views of the ACE in relation to the referred Commission Staff Working Document.

### Position of the ACE

The ACE notes that the current reflection of the Commission relates largely to non-regulated professions. It notes in particular the reference in the executive summary to the Directive on Professional Qualifications (EC/2005/36), which contains a section dedicated to the architectural profession. The fact that the architectural profession is covered by the Directive on Professional Qualifications, diverts, to a certain extent, the interest that the current document has for the ACE as an Organisation. However there are a number of comments that the ACE wishes to bring to the attention of the Commission and it believes that the current Working Document may be of special interest to some of its Member Organisations. Therefore the ACE comments as follows:

1. Many of the ACE Member Organisations are actively engaged in the provision of courses for qualified architects that assist them in maintaining their professional skills and in acquiring new competences. In this regard the indications in the proposed European Qualifications Framework to the establishment of reference points for learning outcomes forms an interesting basis on which the ACE Member Organisations could inform themselves in order to assess the value of the courses they currently provide.
2. In relation to the elements described in the document, the concept of the development of an integrated European credit transfer and accumulation system for life-long learning is a matter which the ACE has already commenced work on for the architectural profession. It is currently engaged in deliberations on the content and manner in which such a system could effectively and efficiently operate for the architectural profession at the European level.
3. The ACE approach to life-long learning is also considering what set of common principles and procedures can be provided that does not automatically lead to the establishment of a set of lowest common denominators in such principles and procedures. The architectural profession strives, at all times, to ensure the highest possible level of competence among practising architects so as to ensure that societal and consumer needs are adequately fulfilled.
4. Guarantees of competence and quality can only exist in a coherent context of education and professional practice in which accredited institutions respond to overall criteria that are set sector by sector. The objective for a candidate, the acquisition of a title, should be as important as the requirements of the client, of an employer for this or that product or service. This is why the accent

should not be excessively placed on certifications without first of all measuring, on a professional and case-by-case basis, their intrinsic value. Ideally, over and above accredited statutory institutions guaranteeing courses and their contents, there should be, in each Member State, a reference body representing practice and the market based on consumer interests and carried by representatives of the professions affected. There are two reasons for this relationship to the market. Firstly to ensure a systematic return to the educator of the socio-economic reality and secondly to guarantee, in full transparency, to the client that he can make the right choice of products and services.

5. The ACE notes that the subsidiarity principle is clearly respected within the European Qualifications Framework in that it states that national Authorities must determine how the Qualifications within each country leading to a European Qualifications Framework operates. The ACE points out that in the case of regulated professions, which are organised and represented at national level, there is a significant role that professional or regulatory bodies can play in ensuring that architects maintain their skills and competences through life long learning. The document of the Commission does not adequately expose this possibility and it represents an area whereby the provisions of the document could be strengthened.
6. Despite the comments at 5 above the ACE notes the description of sectoral initiatives and the fact that the European Qualifications Framework must have relevance and credibility for all those directly affected by any such framework. The ACE agrees that stakeholders must be convinced that the European meta-framework is a need and that it can contribute indirectly and directly to life-long learning. The ACE and its Member Organisations have already adopted (in 2001) a Charter on Continuing Professional Development, which acknowledges the need for this relevance and credibility.
7. The ACE agrees with the statement that the lack of a coherent framework can be a barrier to the recognition of qualifications held by a person delivered in a Member State not being the one in which the person works. The ACE is convinced that measures which ease the recognition of qualifications (University and Life-Long Learning Qualifications) is needed in order to bring more efficiency and transparency to the manner in which qualifications acquired in other countries are recognised. In this regard the proposed Qualifications Framework appears to be a good step.
8. The potential role for national representative or regulatory bodies is discussed to a certain extent in section 4 of the document. In particular the ACE sees relevance for its Member Organisations to be involved in two of the four main functions that the European qualifications Framework intends to address. These are the provision of a common reference for those Authorities recognising education, training and learning outcomes and the provision of a framework for sector and branch level organisations and associations enabling them to identify interconnections, synergies and possible overlaps between offers at sectoral and national level. The ACE will encourage its Member Organisations to inform themselves of the possible impact that such a framework could have on their existing practices.
9. Section 6 of the Working Document contains a number of elements, which the ACE sees as being of particular importance in the establishment of any framework. These aspects relate to quality assurance and the obligations of stakeholders. It is agreed that stakeholders should establish, in accordance with their rights, responsibilities and competences, systems and approaches for the identification and validation of non-formal and informal learning. These should include appropriate quality assurance recognitions and stakeholders should provide guidance counselling and information about these systems and approaches to individuals. These are matters that a number of the ACE Member Organisations have already addressed and for which they have already established systems. However the extension of such systems so as to ensure a greater quality and approximation in the treatment of persons holding such qualifications would be a desirable evolution of the current situation.
10. The ACE requests that the Commission give greater clarity about the relationship between the current proposal and the provisions of the Directive on the Recognition of Professional Qualifications. The ACE is keen to have a structured framework for life-long learning in the profession and it sees that the model described in the European Qualifications Framework has given clues as to how it can be organised for the architectural profession. It remains concerned that the unregulated professions will, through the investment being made by the Commission in this work, gain a better structure for the management and implementation of life-long learning. Its own attempts to have its deliberations on this matter funded through Commission programmes have not, to date, been successful.

11. The ACE does not believe that the division into 8 levels, which form the basis of the European Qualifications Framework, is of particular relevance to the architectural profession. This is because the skills and competences required by the architect are clearly set out in the Directive on Professional Qualifications and the manner in which learning outcomes would be describe for the architectural profession can not easily be matched to the 8 proposed levels in the European Qualifications Framework. Furthermore a concern of the ACE is whether or not the acquisition of skills and competences under the 8 levels will give certainty about the competences of holders to exercise or practice a particular trade or profession.
12. However, in relation to the tables overall, there should be a hierarchy established that relates to the adoption of the Bologna Process and that would allow each affected person to understand it in relation to what it is they are seeking from the market. The table should equally reflect the political and intellectual intentions, market realities and the interests of the consumer. In order to put these principles into action and so that the consumer takes stock of his own interest, the key to reading the table at different levels must be given. The three levels concerned are that of the educator, institution or professional, the level of the candidate and the level of the client or consumer. These keys must take account of the demands of the market, the need for a strong link between the competent authorities, educational institutions and the professional sectors affected and they must put at the disposal of the consumer information and tools that are appropriate to his needs.

### **Conclusions**

The ACE sees the quality thinking that as gone into the development of the current proposal and it applauds the Commission on its work to give structure to sectors that have, to date, been unstructured and difficult to compare across Europe. There is a need to guard against unilateral views that do not adequately take account of the public interest to which all political, social and economic challenges are linked.

The ACE remains, however, sceptical about the direct relevance of the current framework to the architectural profession and it questions the relationship between the current proposal and the provisions of the Directive on Professional Qualifications (2005/36/EC).

Finally the ACE is concerned that the current work does not adequately take account of the competences and actions of professional representative and regulatory bodies at national level for regulated professions.

The ACE awaits further developments in the proposed framework and reserves its position for future development or further elaboration.

### **End of report**