



PGEU CONTRIBUTION

Towards a European Qualification Framework for lifelong learning

Introduction

The Pharmaceutical Group of the European Union (PGEU) is the European association representing community pharmacists in 29 European countries including EU Member States, EEA countries and EU applicant countries. Overall, PGEU represents over 300,000 Community pharmacists in Europe through their professional bodies and pharmacists associations.

As key stakeholders representing the profession, most of PGEU Members are involved in education, training and learning of the pharmacist profession.

Following the release of the Commission staff working document 'towards a European qualification framework for lifelong learning' the PGEU has carefully analysed the impact and the adequacy of the EQF to the pharmacy profession.

The aim of our contribution is to provide the European Commission with PGEU preliminary ideas and concerns on the paper.

Preliminary comments

As the paper signals, the EQF will facilitate the transfer, transparency and recognition of qualifications. However, EQF has to be understood as a complement to Directive on the recognition of professional qualifications 2005/36/EC adopted in June 2005, which is the binding instrument regulating the recognition of professional qualifications in the field of regulated profession, including the pharmacist profession.

The Directive 2005/36/EC regulates the pharmacy profession on chapter III, together with the other sectoral professions under the title "Recognition on the basis of coordination of minimum training conditions". On this chapter the Directive establishes that pharmacists have automatic access to a minimum list of activities in all EU member states. Therefore pharmacists have a privileged legal framework that facilitates their mobility through Europe.

However, we consider that EQF could be especially relevant for the recognition of pharmacy post graduate specialisations, which are not harmonised at EU level and the process of continuous education and lifelong learning.

- The **pharmacy post graduate specialisations courses** exist in almost all EU member states (18 out of 25 EU Member States).The most common courses are "community pharmacy", "clinical pharmacy" and "hospital pharmacy", but there are also programmes on "industrial pharmacy", "pharmaceutical analysis" and some others. Participation in such programmes is voluntary, with the exception of Slovakia. The post-graduate programmes are provided by universities or professional associations, and they are also financed by the state and/or participating pharmacists, and sometimes also by professional associations. The duration and content varies from one country to another. Therefore EQF could be useful as an instrument to improve the mobility of professionals that have followed a pharmacy specialisation course.
- In the pharmacist profession the **continuous training and lifelong learning** is essential for patients. It is linked to the evolution of new pharmaceutical techniques and medicines and the development of pharmacy services. In some countries the continuous training and lifelong learning becomes an obligation through the professional's deontological code. This is the case of Spain and UK. In others EU countries, such as Germany or France the need



of continuous training is even required by law. In the Netherlands, pharmacists should follow programmes of continuous education to get the accreditation of their pharmacies and in Austria the continuous education is part of a collective agreement obliging pharmacists to undertake courses of 6.5 hours per year. Such a variety of different requirements at national level for continuous training could pose difficulties for the movement of professionals. Again it could be useful to have an instrument through which a coordination of the different systems could be achieved.



Answers to the questions

The rationale of an EQF

- **Are the most important objectives and functions to be fulfilled by an EQF those set out in the consultation document?**

We think the objectives set out by the document are adequate. We especially support the idea of 'learning outcomes' as a concept to promote the recognition of qualifications of the professional and the opportunity to validate the non-formal and informal learning. It could ideally reflect the life long learning processes and specialised knowledge that pharmacist acquire in their working life.

- **What is needed to make the EQF work in practical terms (for individual citizens, education and training systems, the labour market)?**

1. In our view there must be clear consistency with the Directive 2005/36/EC. On several occasions the Commission working text clarifies the relation between the professional qualifications Directive and the EQF. However we think that further clarification and coordination between the two systems is needed. For example, the EQF working document says that each country needs to set up a single National Framework of qualifications and link this single National Framework to the EQF. The Directive 2005/36/EC establishes the creation of contact points to provide citizens and member states with the information related to the Directive. Better consideration should be given to existing instrument under Directive 2005/36/ES that could be used to developed EQF, such as the contact points working on national framework of qualifications
2. In our opinion in the table 1 "the eight levels of the European Qualification Framework defined by learning outcomes" further consideration should be given to the introduction of qualitative criteria such as "years of experience" or "number of projects done".
3. Clarification of the system of accumulation for life long learning. As explained above we think the idea behind the "learning outcomes" and validation of non-formal and informal learning could beneficiate the professions. However we would like to have a more practical approach towards the way of quantification of this accumulation system.

The reference levels and descriptors

- Does the 8-level reference structure sufficiently capture the complexity of lifelong learning in Europe?

In pharmacy, the post graduate specialisations courses could be covered for some of the level described. However we have doubts that the life long learning process in pharmacy profession could be included in any of the level proposed.

- Do the level descriptors, in table 1, adequately capture learning outcomes and their progression in levels?

See above

- What should be the content and role of the 'supporting and indicative information' on education, training and learning structures and input (table 2)?

Table 2 seems to incorporate quantitative criteria in comparison with the qualitative approach taken by table1. However, we consider the reference to the cycles of qualifications (Bologna process) is misleading for the classification of the life long learning process into the levels as the cycles do not relate to the working life experience.

- How can your national and sectoral qualifications be matched to the proposed EQF levels and descriptors of learning outcomes?



As we explained above, the Directive 2005/36/EC regulates the pharmacy profession on chapter III establishing that pharmacists have automatic access to a minimum list of activities in all EU member states. Therefore the EQF could be used to agree on criteria to recognise the pharmacy specialisations and the process of life long learning.

National Qualifications Frameworks

- How can a National Qualification Framework for lifelong learning be developed in your country – reflecting the principles of the EQF-be established?

Non-Applicable.

- How, and within which timescale, can your national qualifications systems be developed towards a learning outcomes approach?

Non-Applicable

Sectoral qualifications

- To which extent can the EQF become a catalyst for developments at sector level?

Professional bodies representing sectors are key stakeholders in the implementation of any process related to their sector. Therefore we consider the involvement of professional bodies as an essential move to ensure that EQF becomes a reality

- How can the EQF be used to pursue a more systematic development of knowledge, skills and competences at sector level?

Having close contacts with the profession through the professional bodies representing the sector.

- How can stakeholders at sector level be involved in supporting the implementation of the EQF?

Until recently the pharmacist profession was represented at European level through the Pharmaceutical Committee, originally established to implement the Pharmacy Directives 85/432/EEC and 85/433/EEC now consolidated by the Directive 2005/36/EC. Such committee involved the pharmacy profession and ensured the smooth implementation of the Directive.

We would like to encourage the establishment of a similar organism to deal with the implementation of EQF at European Level.

- How can the link between sectors development and national qualifications be improved?

Non Applicable

Mutual trust

- How can the EQF contribute to the development of mutual trust (e.g. based on common principles for quality assurance) between stakeholders involved in lifelong learning-at European, national, sectoral and local levels?

Establishing clear principles and procedures of participation. As EQF will be implemented in a voluntary basis is also important to have an access to update information on the developments of the process and a centre of reference to get such information.

- How can the EQF become a reference to improve the quality of all levels of lifelong learning?

It should also envisage a procedure for benchmarking.

As EQF will coordinate the different lifelong learning processes in different professions it could keep records of best practices and quality standards.

PGEU needs further explore the Quality assurance system envisaged for the working Commission text and its implications for the pharmacist profession

END

