

Recognition work in Finland:
evaluation of the Finnish ENIC/NARIC –office.

Nordic Recognition and Information Centres Network (NORRIC)

October 2004

Introduction

The Nordic Recognition and Information Centres Network (NORRIC) Evaluation Project is a joint initiative to bring together the principles and work of the five offices within the recognition field. All national recognition agencies will be studied and discussed in the project. The general aims and methodology of the project are presented elsewhere.

The NORRIC Evaluation Project seeks to establish transparency and produce insights into the modes of work of the different offices by focusing on core aspects of what they do. In addition to creating transparency, the method applied will suggest measures where possible for improving the quality delivered by the recognition agencies. As such, one aspiration is for the evaluation project to establish a platform for debate on common recognition standards and criteria.

The Finnish Enic/Naric and the Icelandic Enic/Naric were the first offices to be studied by the NORRIC Evaluation Project. The Finnish office presented a self-assessment in mid April 2004 and a subsequent site visit was made in May. The group meet representatives from the Ministry of Education, the Ministry of Labour and the National Union of Students in Finland as well as admission staff from different institutions of higher education, Heads of Primary Schools in Helsinki and applicants who have received a National Board of Education Ruling. An interview protocol was prepared to guide and support the group's work. Programs for visits and interviews were documented as a base for reporting.

The evaluation team visiting the Finnish Enic/Naric-office had a broad representation from the Nordic offices: Anne-Katherine Mandrup (Denmark), Tryggvi Thórhallsson (Iceland), Anne Marie Heszlein (Norway), Tuula Kuosmanen and Ulf Öhlund (Sweden). Director Sjur Bergan (Council of Europe) gave valuable support to the team as an independent expert.

I Presentation of the Finnish office

The Enic/Naric

The Finnish Enic/Naric was established in 1997 at the National Board of Education (NBE). Prior to this date, the Ministry of Education handled Enic/Naric work. The National Board of Education primarily deals with primary education, secondary education and adult education. The Enic/Naric office comes under the Adult Education Division.

Within the field of recognition the Enic/Naric office covers the following educational areas: upper secondary education (information on access qualifications), vocational education and training (VET) (advisory statements and information) and higher education (provides information and is the expert authority for professional recognition of foreign qualifications). The office is also responsible for the development of vocational adult education.

Organisation, roles and objectives

International conventions on academic recognition have been implemented through national agreements and legislation. Higher education institutions decide on academic recognition of foreign qualifications including access requirements. The Enic/Naric office informs the institutions of foreign education systems and good practice and principles of recognition. In Finland the Lisbon Recognition Convention came into effect on March 1, 2004.

The Enic/Naric-office also makes advisory statements on the comparability of foreign and Finnish vocational education and training (VET). As the National Reference Point (NRP) for VET the office answers enquiries about and provides information on Finnish VET.

Professional recognition is regulated by the Law on recognition of qualifications held by EEA nationals (Act no. 1597) and by the Law on eligibility for civil service posts (Act nr. 531). The Enic/Naric-office is contact/information point for the general system for professional recognition within the EU and is competent authority on professional recognition for most regulated professions in Finland excluding e.g. health care professions, seafarers and veterinarians. Furthermore the office makes legal decisions on the competence of teachers in foreign language education, Steiner education and Montessori pre-primary education.

There is no government-steered statutory system for recognition of foreign qualifications for the private labour market. Employers decide on recognition of foreign qualifications themselves and the Enic/Naric-office gives advice when asked.

The duties of the Enic/Naric office are:

Professional recognition:

- Expert authority for public service posts. The office also makes legal rulings on the qualifications of teachers in foreign language education, Steiner education and Montessori pre-primary education
- Contact/information point for the general system of professional recognition.

National information centre Enic/Naric and NRP

- Information provider on Finnish and foreign access qualifications, higher education and vocational education and training
- Information provider on the Lisbon Convention
- Advisory statements on Finnish and foreign vocational education and training.

Internationally related activities

- Diploma Supplement promoter and contact point for Europass
- International co-operation.

Duties not related to recognition:

Adult education

- Development of vocational adult education.

Staff and Statistics

The Enic/Naric-office has one head of unit and 8 employees: 4 experts, 3 secretaries and 1 project planner.

The number of applications for professional recognition has increased by 88% since the office was established in 1997 (see below). Most applications lead to a recognition ruling but some can be referred elsewhere. There are no statistics on the number of advisory statements on foreign VET qualifications.

Table 1. Applications for professional recognition

<i>Year</i>	<i>Applications</i>	<i>Outcomes</i>	<i>Decisions</i>
1998	265	278	214
2003	496	499	442

Source: NARIC self-assessment protocol.

The Enic/Naric office receives enquiries on both recognition of Finnish qualifications abroad and recognition of foreign qualifications in Finland from both individuals and institutions/organisations. Below is the estimated number of enquiries per annum. There is no statistical breakdown available of enquires per different area of work.

Table 2. Annual enquiries by phone, email and visit to website 2003

<i>Type of enquiry</i>	<i>Phone</i>	<i>Email</i>	<i>Visit to website</i>
<i>Annual enquiries</i>	4800	2600	8700

Source: NARIC Self-assessment protocol

Information: tools and principles

Information is distributed through printed brochures and guide booklets, as well as through the internet (www.oph.fi/info/recognition). The website includes explanations of the role of the National Board of Education in relation to academic and professional recognition, recognition procedures, specialist advisory services provided by the National Board of Education, the Finnish education system, Enic/Naric activities, plus links to central information sources.

The website is available in Finnish, Swedish and English. Brochures and guide booklets have been published in Finnish, Swedish, English, German, French, Spanish and Russian. Information leaflets on the professional recognition of qualifications are also available in Bosnian/Serbo-Croat, Somali, Arabic and Persian.

Outcomes of recognition work

The Finnish Enic/Naric issues recognition decisions on professional recognition. The recognition decision qualified the applicant to work in a certain profession or in professions for which a qualification of a specified level is required.

If an application for recognition is rejected, i.e. if the Enic/Naric-office considers that the qualification in question does not qualify the applicant to work in a certain profession in Finland or in some case is not comparable with a specific qualification in Finland, reasons are given for this decision.

National Board of Education decisions can be appealed against to the Administrative Court and ultimately to the Supreme Administrative Court.

Advisory statements on foreign vocational education and training include the following information on the qualifications in question: the preceding education, the official length of the student programme, level of education, status of the educational institution, the qualification it leads to and the academic and professional rights given to the person holder plus the nearest comparable Finnish equivalent qualification.

Quality Assurance

The office continuously strives to improve its methods and customer services according to feedback received. Spontaneous feedback is also received from applicants, partners and stakeholders, such as higher education institutions and labour administration officials. The office also regularly conducts customer satisfaction surveys.

It is of the utmost importance that all applications are treated equally and similar decisions are given in comparable cases. The office seeks to ensure this through its internal working procedures: a background memorandum with information on the basis for a decision.

Skills training

Unit staff undergoes various forms of training for the work they do. Participation in Enic/Naric activities has been important for the development of professional skills. The unit's Naric contact person was a member of the Naric Advisory Board in 1999-2002 and participated in various projects. Unit staff members have made study visits to other Enic/Narics and the unit has also hosted several such visits. Foreign visitors have provided the whole unit with an opportunity to learn about the administration and practices of recognition activities in other countries.

Unit experts have trained officials in countries that are entering the EU, including Estonia, Latvia, Lithuania, Poland and Slovenia in both short and long-term projects on issues concerning professional recognition and the European Union Directives. Acting as a trainer has also been efficient professional training.

Current Nordic cooperation projects provide all those preparatory recognition rulings with the chance to learn about how recognition activities are handled in other Nordic countries. This also helps the unit assess its own procedures.

II Analysis of recognition work in Finland

Internal organisation of work, workload and expertise

The Enic/Naric office deals with a wide range of duties mainly within recognition. The range of duties, number of cases and enquiries have increased enormously during the lifetime of the office. Finnish ratification of the Lisbon Recognition Convention and the newly accepted Enic/Naric Charter is likely to further increase the work done by the office. The number of staff has been fairly stable since the office was established in 1997. At present 9 people are employed.

The office is able to perform very well due to established recognition routines and can cope with a high workload. At the same time, it is evident that the office with the present combination of workload and staff can only undertake new duties or become more proactive within recognition with difficulty.

A small part of the Enic/Naric-office's range of duties fall within the area of adult education: the task of developing vocational adult education. The office dealt with this task before activities like Enic/Naric, NRP and professional recognition were transferred to it. There is no evidence to suggest that the office's recognition tasks and work within adult education are mutually supportive.

It is the impression of the review team, that the reason for keeping the task of developing vocational adult education at the office is staff rather than task related. The evaluation team recommends the office and the National Board of Education (NBE) consider whether such diverse tasks should remain within the same organisational unit.

The staff have a high level of expertise in terms of both general education and the area of recognition. All credential evaluators including the project planner have a postgraduate degree or Ph.D. It is the policy of the NBE to allow staff to study for a Ph.D. Apart from on the job, knowledge of recognition methods and implementation has been obtained and developed through participation in the Enic/Naric network, at international conferences and training courses.

Recognition work is divided between the staff on the basis on country specialisation. The four recognition experts are designated a number of countries, for which they are responsible. Their responsibility covers both cases of professional recognition and enquiries from higher education

institutions. This workload division ensures a high level of country specific knowledge and specialisation.

It is also evident that staff participation in Nordic and European development work, national working groups and seminars is encouraged and given high priority. It may therefore seem contradictory to raise the question of staff skills training and the division of work. Nevertheless this is a pressing issue and better ways of developing expertise within the field was raised in the interviews. With the aim of enhancing the expert role of individual employees and the office as a whole, a systematic plan for skills training should be implemented. One possibility could be to develop a plan for staff specialisation in recognition related topics such as international duties, methodological problems, country profiles etc.

International cooperation was mentioned as a way to both enrich recognition work and ensure skills development. While the office participates in a wide range of international co-operation activities it stands out as vulnerable by virtue of how the work is organised. The visit left the review team with the impression that one expert primarily represents the office in international co-operation. This is also the impression with the office's relation to national stakeholders. One expert is primarily active in external relations. A more even distribution of international and national duties between experts could be beneficial both for the general competence development among staff and could minimise the risk of office vulnerability.

Before issuing a decision of recognition the recognition work is checked. The head of unit inspects each statement before the Director of Division co-signs it together with the recognition expert. Even though checking statements of recognition is standard procedure in the Nordic countries the Finnish model seems very time consuming. In other countries, another credential evaluator with knowledge of the recognition field often checks the statement of recognition. A higher level of delegation of rights to inspect and co-sign recognition statements to credential evaluators could shorten the recognition process. The evaluation team realise that our recommendation may entail a specific change of legislation, which is a tall order in any system.

Recognition work and quality assurance

The processing of individual applications for professional recognition is based on a database, developed in FileMaker. The office has recently introduced a new and updated version of the database.

The new version ensures a higher level of transparency and a highly structured approach to professional recognition. For each application a file is established containing information about the applicant and the application. As part of the process for an application a background memorandum is prepared as an integral part of the database. The memorandum includes information on e.g. the status of the institution and the qualification, the nominal duration of study, prior studies, professional experience and if necessary the professional and academic qualification this leads to in the country of origin. Additional information in relation to a specific case is also noted in the memorandum. Models or assessment standards of the most common decision types have also been collated to support recognition work and a process description has been made. The review team was impressed with the office's structured approach to professional recognition and the high level of documentation.

This systematic approach to recognition work seems to be counteracted by the combination of the high degree of specialisation of staff and the relative isolation of personnel. Regular office meetings used to be held to share information between staff. Because of increasing work loads office meetings are now held on an ad hoc basis only. Various changes in the organisation of work, especially the ending of regular office meetings could lead to different recognition principles and procedures being developed internally.

It is the view of the review team that office meetings offer a great opportunity for development, support and expertise sharing on very important cases. Office meetings might prove to be an essential tool for the development of recognition methods and principles.

Profile

The Enic/Naric office's work and actions are quite high profile. The number of cases and enquiries has increased over the years. The office takes part in a wide range of information meetings and other arrangements for higher education institutions concerning recognition, diploma supplements, the Bologna Process etc. Office staff are invited to speak at conferences. The office also participates in working groups and projects on the development of higher education. Lately, a member of staff was appointed secretary of the Finnish working group for the development of a Finnish qualification framework. Participation in international networks, projects and working groups is also high on the office agenda. Office experts also engage in training experts from other countries within the area of professional recognition.

In the self-assessment and at the visit it was underlined that the office had many more offers of international co-operation than it can handle. The review team was impressed by the extensive national and international exposure of the office and its awareness of the need for a strategic approach to international co-operation in particular.

The Enic/Naric office is based in the Adult Education Division at the National Board of Education (NBE). From an outside perspective this location is difficult to understand. The NBE primarily deals with primary, secondary and adult education while the Enic/Naric office mostly works with higher education. The office is here for historical and structural reasons.

Users and other stakeholders are very satisfied with the services delivered by the Enic/Naric office and are familiar with the office being within the NBE. Even though the review team is aware of the reasons for the Enic/Naric office being there, it had the impression that the location might not enhance the profile of the Enic/Naric office.

We recommend that the NBE consider the location of the office with a view to forming a separate unit/department within the NBE or some other form of restructuring.

There seems to be some confusion concerning the name of the Enic/Naric office. In the documentation collated for the evaluation the Enic/Naric office is referred to by different names and is sometime presented according to the different duties it performs. In both the self-assessment report and the website the office is called the Qualification Unit. In the NBE organisation chart presented at the visit the office is (translated from Swedish) named the Office

for Development of Exams (sic). The office is also identified under a separate sub-task as the Finnish NRP and the Finnish Enic/Naric. The evaluation team recommends that a distinct name representing all the duties of the office should be considered.

Position in relation to higher education institutions/vulnerability

The relationship between the Enic/Naric-office and higher education institutions is governed by Finnish higher education institutions' high level of autonomy. The relationship can be characterized as informal and ad hoc based. The institutions turn to the Enic/Naric-office for information and advice in difficult cases and invite the office to participate in meetings and conferences. The number of invitations and the level of participation in working groups, etc. show a high level of institutional acceptance of the Enic/Naric-office.

The Enic/Naric office's self-perception does not include a pro-active role vis a vis educational institutions. The office does not initiate activities with higher education institutions and sees little scope for manoeuvre in this respect. The office perceives itself as an expert organisation providing information and guidance on recognition issues and not as pro-active in relation to the stakeholder's implementation of recognition. Given the steadily growing importance of national obligations regarding higher education (i.e. the Lisbon Convention) readiness to actively further such principles should be central to all national agencies.

In the interviews, the higher education institutions and other stakeholders expressed satisfaction with the work done by the office. At the same time, a more pro-active role was sought. In response to these demands, the office should take a more active role in arranging conferences and seminars on recognition issues, offering training courses on methods of recognition for admission officers and other administrative personnel at higher education institutions. The value added for institutions of developing a national network on recognition issues with the Enic/Naric office as the hub was mentioned in the interviews. In the long run, a network could enhance the quality of recognition work at the institutions and reduce the number of enquiries.

It is the impression of the review team that the relationship between the office and higher education institutions is governed by history and tradition rather than rules and regulation. Except for the office's (and NBE's) self-perception of its role in relation to higher education institutions there does not seem to be any obstacle to a more pro-active role, which could strengthen the office's position as an expert organisation.

Information

As the information centre for recognition of higher education, NRP and contact point for professional recognition the office receives many enquiries. The office provides fast and sound information to applicants concerning recognition of professional qualifications. Information leaflets including application forms are provided (in many languages) in printed versions and on the NBE website. The web site pages are increasingly important for disseminating information, and the content of the pages is being constantly added to. The office has done a lot to improve its information to stakeholders and other improvement are in the pipeline. Information packages to admission staff containing user-friendly information to applicants are planned but not yet produced because of resource limitations. It is of the utmost importance that information is accessible in terms of other languages. It is a delicate matter to produce good and correct information in many languages in such a complicated area as recognition.

A broader scope on recognition information should be introduced in accordance with the Enic/Naric information strategy.

The office receives many enquiries concerning foreign upper secondary level qualifications in relation to admission to undergraduate programmes. Until now the office has dealt with these enquiries on case-by-case basis. The office's approach to information provision seems to create repetition in answers rather than assisting the institutions in developing their admission office procedures. A more standardised approach to information provision may limit the number of individual enquiries and free up office time for other activities. With respect to foreign entrance qualifications the office may consider setting up standardised internet-based information on entrance qualification from the 10 to 20 most common countries.

We recommend the office consider the development of its information strategy in line with the principles presented by the office leadership and staff in the interviews.

The Lisbon Convention

Finland ratified the Lisbon Recognition Convention on January 21, 2004, and the Convention came into effect in Finland on March 1, 2004. The National Board of Education was appointed as the Finnish National Information Centre under Article IX.2 of the Convention, while Finland, pursuant to Article II.2 declared that the capability to take recognition decisions lay with higher education institutions.

All parties involved underlined the strong emphasis in Finland on university autonomy. While academic autonomy is important in all Nordic countries, the team came away from the interviews with the clear impression that this aspect is particularly important in Finnish higher education. The group is concerned that this strong emphasis on autonomy could limit information gathering on the implementation of the Convention in Finland, and that this could lead to a lack of consistency in recognition practice. It is conceivable that similar applications be given different recognition at different higher education institutions, and that no clear information on such practices may be collated. This would prevent the Ministry or the Board of Education raising the issue with the institutions.

The evaluation team is therefore concerned about a potentially uneven implementation of the Lisbon Recognition Convention and recommends that Finland should consider ways in which

information on recognition decisions under the Convention may be collated by the relevant authorities along with the opportunity to raise the issues with a view to corrective measures should this information reveal a problem with uneven implementation.

III Summary: strengths, weaknesses and recommendations

The Finnish Enic/Naric office is a well functioning office with skilled and capable staff. Beside professional recognition, which is the major task, the office has a wide range of duties within recognition across educational sectors. In its 7-8 years of existence, the office has developed and continues to develop principles and methods for professional recognition. In this respect it has grown from being an organisation establishing its principles to become an expert organisation with a set of well-proven and respected principles. The combination of tasks and the staffing situation is however a concern and it is evident that the office can only undertake new tasks or become more proactive within recognition with difficulty. The evaluation team recommends the office and the NBE consider the combination of staff and tasks.

It is the impression of the review team, that the Enic/Naric-office, in the years to come, has the maturity and expertise to develop its range of duties and relationships with stakeholders at national level. The office's self-perception is that of an expert organisation, which provides information and advice on demand. It is evident – expressed in some of the interviews - that the office has a high profile nationally. At the same time a more proactive role is demanded in relation to arranging seminars, training sessions and a national network on recognition. Furthermore standardised recognition information and a database with information on previous assessments could prove helpful for both applicants and institutions. The evaluation team recommends the office be more proactive in relation to educational institutions and the national implementation of the Lisbon Convention.

Information on recognition issues is offered via both the internet and in leaflets and brochures. Even so, the office should introduce a broader scope on recognition information in accordance with the Enic/Naric information strategy.

The office's administrative principles are characterised by a high level of transparency and a very structured approach to recognition. This well structured approach may be marred by a high level of workload division (and hence specialisation) and the lack of regular office meetings. It is the view of the review team that office meetings offer a great opportunity for development, support and expertise sharing about cases of great importance.

The control of recognition statements seems very time consuming. A higher level of delegation of rights to check and co-sign recognition statements to credential evaluators could shorten the recognition process.

The skills level of staff is high, and staff participation in national, Nordic and European development work etc. is given high priority. Even so, development work is primarily the responsibility of one expert. A more even distribution of international and national duties, and a systematic plan for skills training could enhance the expert role of individuals and the office.

The office is located within the NBE, and as mentioned before the office has a high profile. Even though the team is left with the impression that the localisation and the name of the office might not enhance this profile.