

Teacher recognition within the Nordic countries

- **Barriers of recognition**
- **Procedures in the recognition practice**
- **Cooperation within the Nordic countries.**

Teacher recognition within the Nordic countries

Teacher recognition within the Nordic countries	1
Barriers of recognition and Nordic cooperation.....	3
The focus points of the report.....	4
Demarcation of the project	4
Structure of the report.....	5
The project group	5
Process.....	6
The Nordic ENIC/NARIC Offices.....	7
Nordic ENIC/NARIC offices and recognition of foreign teachers	8
Different powers	9
The Norwegian process of teacher recognition.....	9
Nordic cooperation on teacher recognition.....	11
Legal framework for recognition of teachers	13
EU-directive on recognition of foreign qualifications.....	13
The Nordic agreements	14
Different use of Nordic agreements.....	14
Added value	15
Administrative problems in the Nordic Agreements.....	18
Seen from the perspective of both the migrant teacher and the competent authorities the Nordic agreements on teachers do cause some administrative problems.....	18
National requirements for qualified teacher status	20
The relationship between the EU-directive and the Nordic agreements.....	20
The relationship between the National requirements and the Nordic agreements.....	21
Barriers of recognition of teacher training programmes.....	22
Barriers of recognition.....	28
The practice of recognition of teacher qualifications.....	31
Assessment criteria for teacher educations	31
Teaching experience	32
Acquired rights	33
Decisions	34
Compensation measures	37
Language assessments	39
External experts.....	39
Appeal procedures	40
Recognition procedures	42
Application procedure	42
Documentation.....	42
Translations.....	43
Fees	44
Conclusion.....	45
Appendix.....	54

Barriers of recognition and Nordic cooperation

This report is part of a bigger project focusing on barriers of recognition of Nordic qualifications and also aimed at enhancing cooperation within the Nordic countries in the field of recognition. The project is a joint project among the Nordic ENIC/NARIC offices, which are national experts in the field of recognition of foreign credentials.

The topic of this specific report is professional recognition of teachers with Nordic teacher qualifications. Teacher training programmes are among the most profiled educations. We all meet teachers throughout our education and for all countries it is important to have high quality teacher training programmes, since educating good teachers is vital in a knowledge society.

Mobility is highly prioritised by all the Nordic governments. Through student and labour mobility new knowledge is accumulated and exchanged and inspiration from new methods and principles are brought back home. In the Nordic countries we have throughout our history had a long tradition for cooperation and exchange of knowledge and goods. Nordic cooperation is also important for Nordic teachers.

Each Nordic country has its own traditions and culture within the teaching professions. Mobility within the Nordic countries can help each country to strengthen its own system of teacher training. It is therefore vital that strict barriers of recognition do not hinder professional recognition of teachers within the Nordic countries.

The process of recognition is therefore important. In all the Nordic countries the profession as teacher in compulsory school and upper secondary school is a regulated profession. The competent authorities in the Nordic countries either decide on recognition or assist the decision makers by assessing the applicant's qualifications. The process of recognition is based on international as well as national laws and agreements. In Denmark, Finland and Sweden the ENIC/NARIC offices act as competent authorities in the field of recognition of teachers. In Norway and Iceland the ENIC/NARIC offices are closely affiliated with teacher recognition.

In some Nordic countries the ENIC/NARIC office has thorough experience in dealing with recognition of foreign teachers. In other countries this is a relatively new task. All offices share the same goal, namely that the process of recognition is efficient, fair and precise. By exchanging information on the process and principles of recognition, we will benefit from the knowledge and experience gained in each country and lay a foundation for further cooperation within the field of teacher recognition in the Nordic countries.

Furthermore we will through this project gather valuable information on the teacher training programmes in the Nordic countries and lay a better foundation for future assessments and we will discuss problems of recognition in order to pave the way for the mobility of teachers.

The focus points of the report

In this project we will:

- Seek to identify barriers of recognition of teachers within the Nordic countries. The barriers will be discussed within the project group and recommendations for future actions for overcoming the barriers will be put forward. Some of the identified barriers can be dealt with within the ENIC/NARIC offices, while others must be brought to the attention of the policy makers.
- Seek to expose best practice in the process of teacher recognition by analysing practice in all countries. We will by discussing and analysing practice, work towards establishing a more unified process of teacher recognition within the Nordic countries.
- Seek to strengthen cooperation among the Nordic countries in the field of teacher recognition and to update our knowledge on Nordic teacher training programmes and to establish a permanent cooperation in the field of teacher recognition.

Demarcation of the project

As described above this project deals with barriers of recognition of teacher qualifications within the Nordic countries. This means that we limit ourselves to discuss the topics, which we are national experts in: Professional recognition of teacher qualifications.

Other barriers for increased teacher mobility can be put to the line: Fiscal barriers, language barriers, personal barriers and so forth. These topics we must leave to people with greater knowledge in these areas.

This is not a classic research project based on intense studying of numerous sources and experiments. The project is based on our own practice and experience. In the case of exposing best practice in the recognition process, each country has described their practice. Furthermore, this has been discussed and analysed at network meetings.

In the case of identifying the barriers of recognition the legal framework has been discussed within the group and legal barriers have been identified and put forward in common understanding. In the case of identifying barriers of recognition of specific teacher training programmes each country has presented a so-called problem pool, which has been debated at our meetings. The findings are put forward and debated and we seek to establish a pattern of the remaining barriers.

The description of the recognition process in each country and the problem pools are enclosed in the appendix as well as the description of the teacher training programmes in each country. It would make the report far too extensive to include all this background material in the actual report. Therefore the appendix including the background material will be presented electronically together with the report at each office's website. We seek to present and debate the core messages of this background material in the report and any reference to the appendix is a reference to the electronic edition of the report. We

have though enclosed a small appendix in this report enclosing a comparison table at the end of the project, which summarises basic facts on the teacher recognition process and procedures.

The report deals strictly with regulated teaching professions. The emphasis in the report is on teacher training programmes at compulsory level and upper secondary level. The large bulk of teachers, which has been assessed in the Nordic countries, are compulsory and upper secondary school teachers.

Structure of the report

As described above the report is based on descriptions and background material written by each country's representative. In the first chapters the focus will be on a description of the Nordic ENIC/NARIC offices and their powers within the field of teacher recognition. The differences will be outlined and recommendations put forward.

In the next chapter focus will be on the legal framework of recognition. How does each office interpret and apply the international agreements in this field, hereunder the Nordic agreements and which problems derive from differences in the interpretation and use of the agreements.

Thereafter focus will be on barriers of recognition of specific teacher training programmes and discussions of the character of these barriers will be presented.

The next chapters address the practice of the recognition process. Which principles and procedures are the guidelines in teacher recognition in all countries?

Finally the report will summarise the conclusions and put forward recommendations for dealing with barriers of recognition and enhancing cooperation among the Nordic countries.

In each chapter recommendations are put forward to sum up the decisions of the group on each subject, which has been discussed.

The project group

The participants of this group are all employed at the Nordic ENIC/NARIC offices except for the Icelandic participant, who is employed at the University of Iceland and has been appointed member by the Icelandic ENIC/NARIC, which also is part of the University of Iceland. All members are experts in teacher recognition. The members are:

Allan Bruun Pedersen, credential evaluator, project leader, Denmark

Gry Dose Jarmer, credential evaluator, Denmark

Raija Timonen, counsellor of education, Finland

Ingrid Björkly, credential evaluator, Norway

Hafdis Ingvarsdottir, Senior lecturer, Ph.D, Iceland

Ann Besmanoff, senior credential evaluator, Sweden

Kerstin Lindgren, senior credential evaluator, Sweden

Stefan Löfkvist, senior credential evaluator, Sweden

The group refers to the directors of the ENIC/NARIC offices.

Process

The group held a preliminary meeting in Copenhagen at the end of September 2003. The group has held two other meetings in Stockholm and Reykjavik in January and March. A final project meeting before handing in this report was held in August in Copenhagen. During the winter months 2003-2004 the group members have worked on national description of teacher training programmes and description of the recognition process in each country. During early spring 2004 lists of specific teacher training programmes, which each country has difficulties in recognising, have been presented internally.

The descriptions and findings of this background material has been discussed and analysed at the network meetings.

The structure and content of the report has been discussed at our last meetings in Reykjavik in March and Copenhagen in August 2004.

The Nordic ENIC/NARIC Offices

Two international networks in relation to assessment of foreign educational qualifications exist. The NARIC Network (National Academic Recognition Information Centres) is an initiative of the European Commission and was created in 1984. The network aims at improving academic recognition of diplomas and periods of study in the Member States of the EU, the EEA countries. The network is part of the Community's Programme SOCRATES/ERASMUS, which stimulates the mobility of students and staff between higher education institutions in these countries.

All EU and EEA States have designated national centres, the purpose of which is to assist in promoting the mobility of students, teachers and researchers by providing authoritative advice and information concerning the academic recognition of diplomas and periods of study undertaken in other States. The main users of this service are higher education institutions, students and their advisers, parents, teachers and prospective employers. The NARICs were designated by the Ministries of Education in the respective countries.

The ENIC Network (European Network of Information Centres) was initiated to develop policy and practice for the recognition of qualifications by the Council of Europe and UNESCO and later on to implement the Lisbon Recognition Convention. The Council of Europe and UNESCO/CEPES jointly provide the Secretariat for the ENIC Network. The ENIC Network cooperates closely with the NARIC Network of the European Union.

The Network is made up of the national information centres of the States party to the European Cultural Convention or the UNESCO Europe Region. An ENIC is a body set up by the national authorities. While the size and specific competence of ENIC may vary, they will generally provide information on:

- recognition of foreign diplomas, degrees and other qualifications;
- education systems in both foreign countries and the ENIC's own country;
- opportunities for studying abroad, including information on loans and scholarships, as well as advice on practical questions related to mobility and equivalence.

The participating organisations of this project are all designated as ENIC/NARIC-offices in their own countries. All the offices have vast experience in evaluating foreign qualifications.

The Nordic ENIC/NARIC offices are

- The Danish Centre for Assessment of Foreign Qualifications, CVUU, an office within the Ministry of Education
- The Finnish National Board of Education, Opetushallitus, a government agency under the Ministry of Education
- The Office for Academic Affairs, Kennslusvið Háskóla Íslands a part of University of Iceland
- Norwegian Agency for Quality Assurance in Education, NOKUT, an independent government institution

- The Swedish National Agency for Higher Education, Högskoleverket, a government agency under the Ministry of Education

The Nordic ENIC/NARIC offices have over the last 2-3 years developed a closer relationship in the field of academic recognition. In Denmark, Finland and Sweden the offices issue certifications, which are legally binding. In Norway the ENIC/NARIC-office issues recognition of foreign higher education qualifications, which are binding for employers and in Iceland the assessments are guiding.

In the case of teacher recognition the offices also have different powers.

Nordic ENIC/NARIC offices and recognition of foreign teachers

According to the EU-Directives the professional recognition of foreign qualifications in a regulated profession is entrusted to a Competent Authority. It lies within the power of a competent authority to make legally valid decisions on recognition of foreign professional qualifications.

The five Nordic NARICs have different powers in relation to recognition of foreign teacher's qualifications. This obviously affects the possibilities of deepening the cooperation among the offices, since some offices operate as competent authorities and have the mandate to issue legally valid decisions, while others have advisory functions in relation to recognition of teachers.

In Denmark, Sweden and Finland the ENIC/NARIC offices all function as competent Authorities.

In Sweden Högskoleverket, Avdelningen för bedömning av utländsk utbildning, has had the task as Competent Authority since 2000.

In Finland, Opetushallitus Tutkintojen kehittämisspalvelut- unit, has served as competent authority since 1997.

In Denmark, Center for Vurdering af Udenlandske Uddannelser, CVUU, has acted as competent authority since 2003.

All three offices have the powers to grant legally valid decisions on professional recognition of foreign teachers.

The situation in Iceland is somewhat different. The Icelandic Ministry of Education acts as competent authority, while Kennslusvið Háskóla Íslands, University of Iceland, Office for Academic Affairs functions as ENIC/NARIC office. The Ministry issues certificates of recognition to foreign teachers. When in doubt the application is heard in a committee appointed by the Ministry. The committee consists of members from the Ministry, the University and teacher organisations. There is one committee for each group of teachers.

In Norway professional recognition of foreign teachers is a more decentralised process. Local employers in each county employ foreign teachers. The employers are bound by assessments from NOKUT and the Regulations Concerning the Act Relating to Primary and Secondary Education – Education

Act/ Forskrift til Lov om grunnskolen og den videregående opplæringa (FOR 1999-06-28-722), which stipulates minimum requirements for qualified teachers at Norwegian schools. On the one hand, NOKUT recognizes the academic level, duration and scope of a foreign teacher education. This general recognition is binding for Norwegian school employers. On the other hand, the school employer is obliged (legally bound) to follow the Regulations Concerning the Act Relating to Primary and Secondary Education. In the same regulation, the EU-directives and the Nordic agreements are integrated (naturalized).

Different powers

In Denmark, Finland and Sweden it has been decided to place the Competent Authority of recognition of foreign teachers qualifications within the national ENIC/NARIC offices. This was done, because the ENIC/NARIC offices function as experts on recognition of foreign credentials. All the ENIC/NARIC offices make assessments of foreign educations and thus thorough knowledge and understanding of foreign educational systems are accumulated in the offices. In Norway the ENIC/NARIC office assists employers with legally binding recognition of foreign higher education qualifications to ensure the quality of the decisions taken by local employers.

In ENIC/NARIC-offices assessments of foreign degrees is the core task of the office, while it obviously doesn't have the same position, when the competent authority is placed in an organisation with other core tasks.

The ENIC/NARIC offices are international recognition networks, which constantly exchange information on foreign credentials. Each office has through the network access to an abundant amount of first hand information about foreign educational systems. Likewise, in the field of academic recognition the ENIC/NARIC offices all operate according to the guidelines of the Lisbon Convention and the "Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications" issued by the Council of Europe and UNESCO and adopted by the Lisbon Convention Recognition Committee. This means that each ENIC/NARIC office apply a common set of standards when assessing foreign credentials for academic purposes.

The strength of placing the competent authority of foreign teacher qualifications outside the ENIC/NARIC office is that it can be more closely connected to the national authorities dealing with national teacher training programmes. This is the case in Iceland, where a committee of people dealing with teacher training programmes advises the competent authority (the Ministry of Education) on professional recognition.

In Norway a more decentralised process of teacher recognition has been implemented and there is no single competent authority. However quality in the process of recognition is assured through expert recognition of foreign higher education qualification from NOKUT and through national regulations stipulating the minimum requirements of teacher qualifications.

The Norwegian process of teacher recognition

The process of professional recognition of teachers in Norway calls for further discussions. The Norwegian process of teacher recognition follows other procedures than in the other Nordic countries,

where the process of professional recognition of teachers is centralised and the competent authority decides on recognition and issues certificates of recognition when possible.

In Norway there is no centralised institution in charge of recognition of teachers. The local school employers receive applications from persons with foreign teacher qualifications. If the employer wants to employ a teacher with foreign qualifications, he/she must get a legally binding assessment from NOKUT of the foreign teacher education qualifications. The local employer is also legally bound to follow the Regulations Concerning the Act Relating to Primary and Secondary Education, where the EU-directive and Nordic agreements as described above are integrated.

This system has its strengths and weaknesses. The strong sides, that is, conditions favourable for foreign teachers, can be described like this:

- A binding recognition of academic qualifications from NOKUT (scope and level) protects foreign teachers' legal rights.
- Regulations Concerning the Act Relating to Primary and Secondary Education – Education Act/ Forskrift til Lov om grunnskolen og den videregående opplæringa (FOR 1999-06-28-722) which stipulates minimum requirements for qualified teachers at Norwegian schools incorporates international legislation.
- Flexible arrangement in employment matters.
- More possibilities for foreign teachers to practice their teaching profession

The weak sides can be described like this:

- Less overview over the employment situation of foreign teachers, since it is up to each school employer to decide whether a foreign teacher can be employed as teacher at his/her school.
- No formal certificate of recognition is issued
- It is difficult for foreign teachers to complain about the employment decision made by school employers, if his/her application for a teaching job has not been successful. NOKUT's decision can be complained to the "Appeal Board" (Klagenemnda). However, it is difficult to complain about decisions made by school employers.

This system gives great powers to the local employers, since the recognition process starts at the local school, when a foreign teacher applies for a vacant position. This can be favourable for the foreign teacher, since it leaves more room for local decisions on employments. It can also be unfavourable for the foreign teacher, because a process of recognition is never started, if the foreign teacher is not employed in the teaching job, he/she has applied for. In this respect the Norwegian procedure is not a true process of recognition. If the local employer does not want to employ a foreign teacher, the foreign teachers will not get an answer, whether he/she can be recognised to teach in Norway or whether another applicant with better qualifications was chosen. The foreign teacher will then not know, whether he/she can be generally recognised as teacher in Norway, since no formal certificate of recognition is issued and the same process starts all over again, if she/he applies for another teaching position. This teacher will neither receive information on, which supplementary demands are needed in

order to be fully recognised as teacher in Norway. A process of general recognition should be started the first time or before a foreign teacher applies for a vacant teaching position.

This also has the implication that a foreign teacher cannot complain about employment decisions, if he/she is not employed. The local school employer has the right to choose among the most qualified applicants, but since the process does not involve a general recognition process of foreign teachers qualifications, the foreign teacher obviously has no chance of appealing decisions on general recognition, when no such decision is taken.

Nordic cooperation on teacher recognition

The ENIC/NARIC offices in all Nordic countries are already part of a formalised international network. Cooperation thus already exists in many different areas concerning recognition of foreign credentials.

In relation to deepening Nordic cooperation on recognition of teachers and establishing a common Nordic framework for teacher recognition, each national competent authority must be able to agree on standards and procedures of recognition. All the Nordic ENIC/NARIC offices except for Iceland are directly involved in professional recognition of teachers either as competent authorities or as part of a recognition process. This creates a solid ground for enhancing cooperation in the field of professional recognition of teachers, since all the offices follow the same international agreements and codes of good practice.

In Iceland the committees dealing with teacher recognition are not tied to the international code of recognition, as are the ENIC/NARIC offices. However, since Iceland is a small country and the numbers of foreign teacher coming to Iceland are limited, this could be overcome quite easily.

Recommendations

After reviewing the structural organisation of process of professional recognition of teachers in the Nordic countries we can conclude, that recognition in general is entrusted with experts in both professional and academic recognition. The role as competent authority of recognition of foreign teacher qualifications is and should be entrusted with the national ENIC/NARIC offices. This guarantees that recognition of teachers is placed within an office, which functions as an expert body on foreign educational systems and which has assessments of foreign qualifications as its core task. In relation to establishing a common Nordic framework for recognition of teacher qualifications standard procedures and methods of recognition should be based on a common understanding on methods and procedures of professional recognition and a mutual understanding of good practice should be agreed on. A centralisation of a recognition process will guarantee that Nordic agreements and EU directives are implemented in the case of teacher recognition.

Norway has a more decentralised structure. It must be underlined, that the role of NOKUT is very important, since one cannot expect local employers to have the same expert knowledge on the EU directive and on foreign qualifications as the Norwegian ENIC/NARIC office. It must also be discussed, whether Norway has a need for a more centralised process of recognition. A foreign teacher should be able to apply for a certificate of recognition and to appeal decisions, which are not favourable towards

general recognition as either class teacher or subject teacher. A general process of recognition should be started, when/before a foreign teacher applies for a vacant teaching position for the first time in Norway.

In Iceland, which has a very small ENIC/NARIC office, it is recommended that the Icelandic ENIC/NARIC office be given a role as either member of the committees dealing with teacher recognition or an advisory position.

Legal framework for recognition of teachers

As seen in the previous chapter the powers of the Nordic ENIC/NARIC offices varies but leaves no serious barriers for future cooperation in the field of professional recognition of teachers within the Nordic countries. We therefore turn to addressing the legal framework and in this chapter, we will present and discuss the framework and the international agreements in this field. Finally we will put forward questions about the relation between the EU-Directive and Nordic agreements.

The professional recognition of foreign teachers in the Nordic countries is regulated by EU-directives and Nordic agreements. These are implemented in national laws in various degrees.

The EU-Directive, Council Directive 89/48/EEC of 21 December 1988 on a general system for the recognition of higher-education diplomas is the directive regulating recognition of foreign qualifications in regulated professions and thus also regulated teacher professions.

There are three Nordic agreements on recognition of Nordic teachers.

- A general agreement concerning class/almen/folkeskole teacher signed in 1982.
- A specific agreement concerning compulsory school, ämneslärere/lärare i praktisk-estetiska ämnen/speciallärere signed in 1986.
- A specific agreement concerning upper secondary school, ämneslärere/lärare i praktisk-estetiska ämnen signed in 1986.

In the first part of this chapter focus will be on the EU-directive. Then a discussion about the validity and functionality of the Nordic agreements will be raised and finally some comments on the relations between the EU-directive and the Nordic agreements will be made.

EU-directive on recognition of foreign qualifications

The EU-directive governs recognition of professional qualifications for EU-and EEA citizens in regulated professions. This covers all the Nordic countries. According to the directive (article 3) the host member state may not refuse to authorize a national of a member-state, who holds a valid diploma, to pursue the profession he/she is fully qualified for in the country of origin. Article 1 defines the diploma: a post-secondary qualification of at least three years' duration. In case the duration of the applicant's education is at least one year shorter than the education required in the member, state professional experience may be used as compensation measure (article 4). The period of professional experience may not exceed twice the shortfall in the duration of education. The maximum time is four years.

If it is assessed that there are substantial differences in the content of education or profession, completion of an aptitude test or an adaptation period may be required. The applicant must be given a choice between the aptitude test and the adaptation period. It is not possible to require both professional experience and aptitude test or adaptation period.

The competent authority specifies the content of the aptitude test. The aptitude test is a test limited to professional knowledge of the applicant with the aim of assessing the ability of the applicant to pursue

the regulated profession in the host member state. It must cover subject knowledge, which is essential in order to exercise the profession in the member state. The Competent Authority cannot demand, that the applicant completes courses in relation to the aptitude test. The applicant must have the possibility to pass the aptitude test without having to take further studies. On the other hand the applicant can follow courses enabling him/her to pass the test, if this is chosen and possible according to national legislation.

An adaptation period is a period of supervised practice of a regulated profession under the responsibility of a fully trained teacher. This period must be subject to an assessment by the supervisor. An adaptation period must not exceed 3 years.

The Directive is valid in all the Nordic countries. However, the implementation of the directive varies among the Nordic countries, and the use of supplementary demands such as aptitude tests and adaptation periods also varies, which will be discussed in a later chapter. The governing rule of recognition of foreign and thus Nordic teachers are, that they must have an education of at least three years duration and they must be fully qualified teachers in their country of origin for the same type of teaching they are applying for.

In Finland, Iceland, Sweden and Denmark the directive is used by the Competent authorities for recognising foreign teachers. In Norway The Ministry of Education is responsible for controlling that the recognition is done in accordance with the EU-directive.

The EU-directive is signed by all governments to enhance mobility within the European Common Market. The directive sets standards for how and when to recognise foreign teachers. The EU-directive is the common framework for professional recognition, which also ties the recognition process in the Nordic countries to the other EU- and EFTA-countries.

The Nordic agreements

The three Nordic agreements are signed in the 1980'ies in order to create a common labour market for Nordic teachers and to enhance mobility within the Nordic countries.

The Nordic agreements are thus implemented to favour teachers' possibilities to teach in other Nordic countries. However, the practical implementation of the agreements is done in different ways in the Nordic countries and furthermore the agreements have not been revised since the implementation, even though the structure of the educational systems and the teacher training programmes have been revised.

Finally there is no clear understanding of the juridical relationship between the Nordic agreements and the EU-directives among the competent authorities in the Nordic countries.

Different use of Nordic agreements

As mentioned above there are three Nordic agreements on recognition of teachers. The first agreement signed concerns the recognition of class teachers. The two other agreements concern recognition of

subject teachers and special needs teachers in compulsory school and subject teachers in upper secondary school.

It is only in Finland, Denmark and Norway that the competent authorities in the process of recognising Nordic teachers apply the Nordic agreements.

In Iceland the Nordic agreements are not taken into account, since there are no problems with recognising Nordic teachers in Iceland according to the EU-directive. Iceland has the shortest teacher training programmes in the Nordic countries and this implies that there only in few cases is an added value in using the Nordic agreements instead of the directive.

In Sweden recognition of foreign teachers is done in accordance with the EU-directive. The Nordic agreements are not applied in the recognition procedure. The background for this is, that there is an understanding that the Nordic agreements are outdated by the EU-directive.

Added value

As shown above the Nordic agreements are used in different ways, if used at all in the Nordic countries. In some respect the directive outdates the Nordic agreements. If the Nordic agreements should be used in recognition of teachers it is clear that they must bring an added value to the applicant in comparison with the EU-directive, since it does not make sense to apply an agreement, if the content is covered by another and more extensive agreement.

This added value can be found in some specific cases, although in general, the governing principle of the directive stating that a member state should recognise post secondary programmes with a length of minimum three years, in most cases overlaps the principles of the Nordic agreements.

The Nordic agreement concerning class teacher's states, that anyone who has completed an officially recognised class teacher education in any Nordic country with the duration of at least three years shall be accepted as a teacher in other Nordic countries. There is thus no mention of the level of education in the Nordic agreements as is the case in the EU-directive.

Another added value in the Nordic agreement on class teachers is that there is no mention of substantial differences. According to the directive a competent authority can ask for supplementary demands in the form of professional experience in the case of shortfall in the duration of education or in the form of an aptitude test or an adaptation period as described above. This means that according to the Nordic agreements automatic recognition should be granted in the Nordic countries to any class teacher, who has completed an official teacher training programme of at least 3 years length regardless of structural differences in the educational system and different teaching competence between the various teacher training programmes in another Nordic country. In Denmark an extra demand of a professional/pedagogical examination can be required. It has to be completed during the first four years of service.

The Nordic agreement on class teachers brings added value to teachers, who have completed a teacher training programme of less than 3 years. This kind of qualification gives them competence to teach

forms 1-4 in any Nordic country. Even though there are no teacher training programmes shorter than 3 years in any Nordic country today, this ensures the right of those teachers, who have this kind of qualifications and are still working today and would like to work in another Nordic country. These cases are rare at present and will slowly fade away, since these kinds of teachers have not been educated for many years. An example of this is the Swedish lågstadielärare programme, which was reformed in 1988 and which gave access to teaching from 1-3 class in Sweden. They should thus be given access to teach in the other Nordic countries from 1-3 class although this is not compatible with the educational system in the other countries. In Norway, Denmark and Iceland teachers teach from 1-10 and no national teachers are employed with formal competence to teach only in the lower classes.

In Finland this restricted competence can be expanded to grades 5-6 by completing additional studies at a university (NBE decision 181/041/98).

Nordic agreement on class teachers (article 6) states, that the signatories must revise their own legislation according to the principles mentioned in articles from 1 to 5. In Finland this revision has been done and the legislation is still valid. The teachers are employed solely on the basis on their diplomas and no further certification or documentation is required. However, as shown above the Nordic agreements are not implemented in national legislation in all Nordic countries and not always used in recognition of teacher qualifications.

There are two agreements covering recognition of subject teachers at compulsory school (ämneslärare/lärare i praktisk-estetiska ämnen) on the one hand and upper secondary school, (ämneslärare/lärare i praktisk-estetiska ämnen/speciallärare) on the other both signed in 1986. The agreements have a different content than the agreement concerning class teachers.

Most notably the agreements state that recognition should be granted, if there are not substantial differences between the teacher training programmes in the country of origin and the other Nordic country. The concept of substantial differences between the programmes as we know from the EU-directive, is thus also used here.

Furthermore subject teachers in theoretical subjects should be recognised, if they have a length of minimum 4 years. This is a more demanding approach than in the directive, which states that you should recognise programmes of at least 3 years.

The two agreements state that teachers in praktisk-estetiska ämnen must be recognised, if they have completed a teacher training programme with duration of at least 3 years.

If you look at these two last agreements in order to establish, in which ways the Nordic agreements constitute any form of added value in comparison with the EU-directive for Nordic teachers applying for recognition in another Nordic country, it becomes evident that there in fact is no added value in the agreements.

Both the EU-directive and the Nordic agreements conclude, that foreign teacher qualifications should be recognised unless there are substantial differences. The Nordic agreements on ämneslärare and prak-

tisk-estetiska ämnen for compulsory school and for upper secondary school as well as for special needs teachers in compulsory school are in fact more restrictive than the EU-directive. Subject teachers in theoretical subjects must have an education of at least four years of teacher training and teaching experience cannot compensate for lack of educational qualifications. The more restrictive approach of the Nordic agreement on subject teacher can be illustrated by the fact, that the training of Icelandic subject teachers in compulsory school has a nominal duration of 3 years and thus cannot be recognised according to the Nordic agreement, while recognition is possible according to the EU-directive.

In Finland it is, de jure, possible to issue certificates of competence with the requirement of additional studies in cases with substantial difference. Certificates of competence have not, however, been issued for many years, because recognition based on the EU-directive is more favourable to the applicant and usually all Nordic subject and special needs teacher qualifications fall under the EU-directive.

Recommendation

Teacher recognition is governed by both the EU-directive and the Nordic agreements. As shown it is only in Finland, Denmark and Norway, that the competent authorities use the Nordic agreements. The status of the Nordic agreements must be verified and the same rules and procedures in relation to the Nordic agreements must be followed by all the Nordic countries. The present state indicates that teachers are treated differently when applying in the different Nordic countries. If the Nordic agreements are not followed and instead only the EU-directive is applied, the competent authority may require professional experience or an adaptation period or an aptitude test, where no compensation measures can be required according to the Nordic agreements.

All countries are obliged to follow the EU-directive when treating applications from EU- and EEA-teachers. If the Nordic agreements should be used, they must give Nordic teachers an added value in comparison with the directive. It must be easier for Nordic teachers to be recognised within the Nordic countries.

As shown above there is no added value for subject teachers and teachers in practical esthetical subjects or special needs teachers. On the contrary the content of the Nordic agreements indicate a more restrictive approach to recognition and this practice is not in line with the directive.

The Nordic agreement on class teachers does give some added value seen from the perspective of the applicant and has a less restrictive approach than the EU-directive. It is not a demand that the teacher training programme must be a higher education programme. There is no mention of the concept substantial differences as in the directive meaning that all class teachers in fact should be recognised, if the teacher-training programme has a duration of at least 3 years. Furthermore it is stated that you must give recognition to teachers although they only have teaching competence from 1-4 class regardless of the fact, that this does not fit the structure of the educational system in some of the other Nordic countries, i.e. Denmark, Norway and Iceland, where compulsory school consists of 1-10 class and all national teachers have been trained for teaching throughout compulsory school and regardless of the fact that these teachers have taken a teacher training programme with a duration shorter than 3 years. Seen from the perspective of a competent authority this added value may be seen as a breach in the quality assurance of teacher standards and as incompatible with national systems.

The Nordic agreements must be revised, since they in many ways are outdated. They must as a minimum be in compliance with the EU-directive and they must give added value in the recognition procedure. The added value in relation to recognition of class teachers however does pose some structural and practical problems. Issuing teaching competence to Nordic teachers in forms 1-4 in a system, which is based on teachers teaching from 1-10 class is in fact only a pro forma recognition, since employers at the local schools will find it very difficult to use teachers with such a narrow teaching competence. In real life, this is a minor problem, which is slowly phasing out, since teachers with a competence to teach from 1-4 class refer the Swedish Lågstadie lärare only. Most of these teachers have undergone further education enabling them to teach in higher classes. Hence, only few teachers with this narrow teaching competence are still teaching. However, Finnish teachers with teaching competence from 1-6 class and Swedish teachers with teaching competence from 1-7 class can also be difficult to fit in the structure in Iceland, Norway and Denmark, where teachers are qualified to teach grades 1-10, and obviously it can be difficult to fit in the Danish, Icelandic and Norwegian teachers to the Finnish and Swedish structure.

The fact that there are no specific demands in the Nordic agreement on class teachers that teacher training must be higher education, is a remnant from the time the agreement was signed. Teacher training programme in all countries have since many years been higher education. This situation actually opens the possibility that a Nordic citizen, who was trained at a time, where a class teacher programme was not higher education, and who has not taught for many years or taken further education, in fact can claim recognition in the other Nordic countries, is not acceptable for all Nordic countries. The Finnish authorities however, have a different position in this matter. They remark that according to the Nordic agreements you must recognise fully trained teachers with teaching competence in their country of origin notwithstanding the level of qualification.

In general the Nordic agreements on teachers must be revised, since they reflect an outdated educational structure and since the teacher training programmes in all countries have been revised since the agreement were signed.

Administrative problems in the Nordic Agreements

Seen from the perspective of both the migrant teacher and the competent authorities the Nordic agreements on teachers do cause some administrative problems.

In a number of articles in the Nordic agreement on class teachers obligations concerning certain arrangements are left to the signatories to be decided nationally without outlining them in more detail. These are the following:

- supplementary studies for teachers with education less than 3 years in order to be able to teach all classes (article 1)
- language testing in the language of instruction and preparatory courses for these tests (article 2)
Class teachers with a Scandinavian language can be employed directly without going through a language test on the condition that a test is taken during the first two years of employment
- subject related/pedagogical test in Denmark during the first 4 years of service (article 3)

First of all it is a problem that the agreements are not used in all countries by the recognising authorities. Furthermore it seems that articles stating rules about supplementary demands and language requirements are not followed or there are no administrative procedures to back up the Nordic legislation.

It is stated in the agreements on class teachers, that teachers with a teaching competence to 1-4 class must be given possibility to take supplementary courses to enable them to teach higher classes. However, the competent authorities in all Nordic countries except for Finland are not aware of, if these courses are offered to teachers or if employers at the local school are aware of this possibility. There are no specific courses relating to this situation and no control with practice in the schools. In Finland the restricted competence to teach grades 1-4 can be expanded to grades 5-6 by taking additional studies at a Finnish University.

Regarding language requirements it is stated in the Nordic agreement on class teachers that a teacher must have command of the language of instruction in the respective schools. The national authorities are responsible for both tests and language training. Furthermore it is stated that class teachers with a Scandinavian language can be employed directly without going through a language test on the condition that a test is taken during the first two years of employment.

It seems unclear where the direct responsibility for the tests and the language training is anchored. Evidently the overall responsibility lies within the Ministries of Education. However, the competent authorities in all countries except for Finland are not aware, which office has the responsibility in real life. Certainly this is at present not seen as a part of the competent authorities' responsibility. In Finland the requirements for permanent teaching positions generally include obtaining the civil service language proficiency certificate by passing the so-called Major language test (iso kielitutkinto) in either Finnish or Swedish. These language tests are arranged by the State Boards of Language Examinations, which function in conjunction with the National Board of Education.

Again no procedures of controlling whether these articles are followed and whether these tests are indeed offered are established in the Nordic countries except for Finland.

Regarding the subject teachers and practical esthetical teachers it is simply stated in the Nordic agreements that teachers must be in command of the teaching language.

Finally national legislation can cause administrative problems as well. In the Danish order on the Nordic agreement on class teachers, it is stated that Nordic teachers within the first 4 years of employment must take a subject related/pedagogical test. Again there are no procedures to control whether this is actually followed at the local schools, when they are employing Nordic teachers, and the competent authority is not aware of which specific test, the article relates to, or if indeed this test is still available.

Recommendation

The group recommends that if there is a need for supplementary tests, it must be made clear, who is responsible for administering and controlling the tests. Furthermore, local schools must be made aware

of this procedure. Clearly it is the responsibility of the Danish authorities to administer the subject related/pedagogical test for class teachers. However, the need for such a test should be critically revised, since teacher training programmes in all Nordic countries have undergone major changes since the signing of the Nordic agreement on class teachers in 1986. The Nordic agreement gives only Denmark the possibility to require a separate examination in of teachers from other Nordic countries. If the Nordic agreement on class teachers would be revised possibility to require this kind of examination could be granted to Norway and Iceland since they have the same structure of compulsory education as Denmark. We therefore recommend, that the subject related/pedagogical test should be abolished. This would have no practical implication in Denmark, since the possibility of testing Nordic class teachers is not used in Denmark.

In the case of language requirements it is obvious that teachers must be in command of the teaching language. However, there is as mentioned no control with either the preparation of language courses or the actual tests.

It is recommended that this responsibility of checking language proficiency be given to the employers at the local schools. When local schools employ teachers they are already checking their qualifications and language qualifications is certainly one of the aspects to be checked. No school will hire a teacher, if they find out during the interview, that the teacher is not in proper command of the teaching language. In all countries except for Sweden it is already the responsibility of the employers to check language proficiency. Finland is of the opinion that it should be left to national authorities to decide, how to arrange language testing and preparatory courses.

National requirements for qualified teacher status

In addition to the Nordic agreements and the EU-directive national legislation on the qualification requirements of teachers influences the recognition of Nordic teachers within the Nordic countries.

Concerning subject teachers in Finland, Norway and Sweden the minimum amount of credits in the subjects taught in teacher training programmes is outlined in national legislation.

Regarding upper secondary school teachers in Denmark a number of specific demands are outlined in national legislation regarding credits in certain subjects. A geography teacher must have a specific field course and in chemistry a teacher must have taken a specific course in classroom experiments.

The relationship between the EU-directive and the Nordic agreements

As described above the Nordic Agreements are not always in compliance with the EU-directive. Nor do the agreements of subject teachers give added value for applicants trying to get their teacher degree recognised in another Nordic country. Furthermore, the added value in the Nordic agreements on class teachers is in some cases out of touch with the present status of the teaching profession and the demands of the labour market.

One point to be made in this connection is, that the Nordic agreements all came into existence before the directive.

The *raison d' être* of the Nordic agreements consists in the Nordic agreements being more favourable to the applicant than the EU-directive. If this is not the case, it should be considered if the directive has made the Nordic agreements dispensable. The agreements should only be kept if and when they are more favourable than the directive. It seems that the agreements have some *raison d' être* when an applicant has no professional experience. At the same time the agreements still contain inexpediencies in relation to the education system and teacher professions in all the Nordic countries and in relation to the ability for the authorities to implement the agreements. Therefore the project group wishes to recommend that should the Nordic agreements be kept in existence, there is a need for an updating of the content since all education systems (and teacher professions) have undergone reforms in the Nordic countries after the agreements came into existence.

One thing to analyse is, how a more favourable agreement between the Nordic countries corresponds with the EU-directive as such. Can this be seen as discrimination of other EU-citizens?

There is a need of clarification on these matters before a more detailed examination of the content and implementation of the agreements as such is carried out. Juridical expertise is needed to clarify these issues.

The relationship between the National requirements and the Nordic agreements

The specific national legislation, which might coincide with the context of the Nordic agreements, is related to recognition of subject teachers. The Nordic agreement on subject teachers specify that teachers should be recognised unless there are substantial differences and the specific demands for qualified teacher status can be interpreted as substantial differences. Such substantial differences can be compensated for instance by supplementary studies in the end yielding recognition to the applicant.

Barriers of recognition of teacher training programmes

We now turn towards the assessment of specific Nordic teacher training programmes. We will identify the programmes, which each country finds difficult to recognise directly and analyse the nature of these barriers. It can be difficult to put forward direct recommendations on recognition of specific programmes, since the programmes in question are the programmes, which each country is finding difficult to fit into the national structure. It should be remembered that during this project we have consulted each other debating specific teacher training programmes. This has had the effect that the list of teacher training programmes, which can be difficult to recognise directly, and which are mentioned here, has been shortened already. In this respect the project has already had a positive effect in removing specific barriers of teacher recognition within the Nordic countries.

In general one can say that there are very few barriers of recognition of teacher training programmes within the Nordic countries. This means that Nordic teachers are generally recognized and given access to teaching positions within the other Nordic countries.

However the teaching competence, which is granted in another country, is often more narrow and does not cover the same classes compared with the teaching competence the teacher is qualified to in his/her native country. In this respect one can speak of barriers of recognition.

Barriers of recognition of teacher training programmes can be categorized within three categories. They stem from either:

- Structural problems due to different educational systems and teacher training programmes
- Some countries have more regulated teacher professions
- Substantial differences in the qualifications obtained through the teacher training programmes.

During this project a problem pool has been developed describing for all countries, which types of teacher training programmes each single country would have difficulties in recognising. Below these programmes are listed and commented on, why it is problematic to grant direct access to teaching. Considering the number of different teacher training programmes the list is far from exhaustive and programmes not mentioned should be regarded as recognisable. It should also be mentioned, that the description of barriers reflects only educational qualifications. According to the EU-directive teaching experience can make up for shorter duration of teacher training programmes. The barriers listed below only take educational qualifications into account meaning that teachers with educational qualifications listed below may be eligible for authorisation based upon teaching experience compensating for shorter duration of teacher training programmes.

Diagram of teacher training programmes

It should be noted, that the admission to all teacher training programmes is 12 years of previous schooling, in Iceland and Norway 13 years, and based on upper secondary exams, which give general access to higher education programmes in all the Nordic countries. The diagrams reflect the various teacher training programmes in the Nordic countries and the educational structure of each country.

These diagrams give the reader a possibility of relating the descriptions of the single teacher training programmes, which each country is having difficulties in recognising with the structure of teacher training programmes and educational system in each country. For a detailed description of each training programme one must look at the appendix.

The diagrams only shows the most common teacher training programmes and are covering the programmes mentioned in this chapter.

Pre-school teachers

	Denmark	Finland	Iceland	Norway	Sweden
Degree	Bachelor	Bachelor	Bachelor	Bachelor	Bachelor
Duration of programme	4 years	3 years	3 years	3 years	3½ years
Teaching competence	Pre-school. May also teach lower grades in a team with compulsory school teachers	Pre-school	Pre-school.	Pre-school and 1. year of compulsory school. If a pre-school teacher takes a further training course with a duration of 1 year, he/she is entitled to teach 1-4. grades	Pre-school and preparatory class in compulsory school. May also teach lower grades in a team with compulsory school teachers

Compulsory School Teachers

Finland and Sweden distinguish between class teachers and subject teachers, while in Denmark, Iceland and Norway teachers can teach all subjects from 1-10 class. In Norway specialist subject teachers are educated within physical training, arts and crafts, music/dance/drama, and practical and aesthetic subjects.

	Denmark	Finland	Iceland	Norway	Sweden
Degree	Bachelor	Master	Bachelor	Bachelor	Bachelor
Duration of programme	4 years	5 years	3 years	4 years	3½ years
Teaching competence	1-10 class. Can teach all subjects, but have specialised in 4 subjects	1-6 class. Can teach all subjects. Studies of at least 35 credits (Finnish credit system) in an optional minor issue competence to teach this subject in 7-9 classes	1-10 class. Can teach all subjects	1-10. Class. Can teach all subjects. The Specialist subject teachers all teach their specialist subject. ¹	1-7 class. Can teach all subjects.
Subject teachers Degree		Master		Bachelor. Before 2003 cand. mag.	Bachelor
Duration of programme		5 years		3-4 years. Before 2003 4-5 years	4½ years
Teaching competence		7-9 class. Can teach 1-3 subjects most often 2 subjects.		1-10 class 8-10 class	4-9 class. Can teach two subjects. ²

¹ In Norway a PPU-programme (Praktisk-pedagogisk utdanning) with duration of 1 year can be taken after completion of a bachelor- or master degree. The PPU-programme qualifies the teacher to teach in 2-3 subjects from 1-10 class. Trained teachers can also take master programmes, which qualifies the to become lectors.

² In Sweden there is also a PPU-programme of 1-1½ years duration following an academic degree, which qualifies for teaching 4-9 class in two subjects.

Upper secondary school teachers

	Denmark	Finland	Iceland	Norway	Sweden
Degree	Master + Pædagogikum (Post-graduate certificate in education)	Master + post-graduate certificate in education or pedagogical studies integrated in Master programme	Bachelor + 1 year of post-graduate teacher training. Master + ½ year postgraduate teacher training	Master or bachelor ³	Master + post-graduate teacher training programme or integrated
Duration of Programme	5+1 year gives competence to teach in one subject. 5+ 2 years gives competence to teach two subjects	5 years or 5 + 1 year	3+ 1 year or 5+ ½ year	5 years for integrated master of education programme. 3-4 years for specialist subject teachers. 3-4 years+ 2 years of post-graduate teacher training programme for the master programme for those with a first university degree. 3-4 years or 6 years + 1 year of postgraduate teacher training programme for the PPU-programme.	4½+ 1 year of postgraduate teacher training programme or integrated master of education programme, 4½-5½ years
Teaching competence	10-12 class. 1-2 subjects. The vast majority teach two subjects.	10-12. class. 1- 3 subjects, most often 2 subjects.	11-13 class. 1 or 2 subjects: bachelor degree + 1 year. 1 or 2 subjects: Master degree and ½ year.	10-13 class Two subjects. 2 subjects for specialist subject teachers	10-12 class. 1-2 subjects.

³ Bachelor - Specialist Subject Teacher Diploma (faglærerutdanning) in six different subjects (physical training, arts and handicraft, music, dance, drama/theatre, and practical and aesthetic subjects). The duration of the programmes varies according to the subjects one specializes in. The duration of the programme is 4 years for training in practical and aesthetic subjects, and 3

Barriers for specific teacher training programmes

The Danish list

Regarding Finnish teacher training programmes very few applications have been received. Hence a fixed standard is not set for recognition of Finnish teacher qualifications.

- Finnish class teachers: have teaching competence from 1-6 class, while in Denmark teachers in compulsory school teach from 1-10 class. However, didactics of teaching 1-9 class is included in the Finnish class teachers' education. No formal decision on recognition has been taken. However, the inclination leans towards recognition.

Regarding Norwegian programmes it is a significant trait of Norwegian teacher training that there are several programmes aimed at becoming teacher in both compulsory school and upper secondary school. Some of these programmes can be recognised immediately, while one causes problems. The following barrier can be listed:

- Subject teachers in upper secondary school can be qualified to teach with a bachelor degree and 1 year of postgraduate training. In Denmark you must have a kandidatgrad/master degree of 5 years duration and 1 year of postgraduate training to teach 1 subject in upper secondary school.

Regarding Icelandic programmes the main problem concerns a difference in educational qualifications for upper secondary teachers:

- Upper secondary teachers in Iceland have a bachelor degree and 1 year of postgraduate education, while in Denmark the demands are a master level/kandidatgrad + 1-2 years of postgraduate education.

Regarding Swedish qualifications the following problems can be listed:

- The older Swedish programmes, where teachers were trained to teach either from 1-3, 4-6, or 7-9 are much too narrow compared with Danish compulsory school teachers competence, which ranges from 1-10 class. However, many Swedish teachers with these educations have acquired right to teach 1-7 class or 4-9 class through continuing education, so in real life the problem seems to be more academic than actually existing.
- Swedish upper secondary school teachers can qualify to teach in two subjects on the basis of a 4 years magistergrad and 1 year of postgraduate training or an integrated teacher training programme with the same duration and the same level of subject studies. In Denmark it is 5 years education followed by 2 years postgraduate training to teach two subjects. In this case the dura-

years for the rest of the subject groups. There are two types of master programmes leading to teaching competence in upper secondary school: A 5 year integrated master of education programme or a master of education programme based on a cand. mag. (first degree) and 1-2 years postgraduate training. Finally you can take a PPU-programme of 1 year after a completed first university degree giving you the title adjunct or after a completed second university degree giving you the title lector.

tion of the teacher training programme can be two years shorter, which can be compensated by professional experience.

The Icelandic list

In Iceland there seems to be almost no barriers of recognition related to specific teacher training programmes. This stems from the fact that Icelandic teacher training programmes in general are shorter than in the other Nordic countries. One problem has been raised:

- The profession as pre-school teacher is not a regulated profession in Denmark. According to the EU-directive, this means that Danish pre-school teachers can be asked to prove documentation of two years of relevant teaching experience, before their application can be treated according to the EU-directive and thus recognised directly.

The Finnish list

- Danish and Icelandic compulsory school teachers and Norwegian class teachers are entitled to teach from 1-10 class in their own countries. In Finland they are recognised to teach as class teachers from 1-6 class. This means, that the teachers are recognised but due to structural differences, their teaching competence is limited compared to the one they have in their own countries. The next level in Finland is a subject teacher covering 7-12 class. The Finnish subject teachers do more credits in their teaching subjects than the teachers for compulsory school from Norway, Iceland and Denmark and teach higher level. Depending on the amount of studies in the subject/s taught these teachers could possibly be issued recognition to teach the subjects of their specialisation on grades 7-9.

Regarding Icelandic qualifications:

- Icelandic qualifications for compulsory school teachers and upper secondary school teachers are at least one year shorter than the respective Finnish qualifications and recognition would be granted with professional experience as compensation
- Vocational subjects teacher with upper-secondary level four year diploma would not be recognised

Regarding Danish qualifications:

- Danish VET-teachers in craft-subjects have a VET-degree and a postgraduate programme in pedagogic would not be recognised, while in Finland these teachers have a master's degree.

Regarding Swedish qualifications:

- Swedish *förskollärarexamen* (2 years), *bildlärar-, slöjdlärar-, teckningslärar- and tekstillärarexamina* (3 years), and *grundskollärarexamen* (3,5 years) are recognised with professional experience as compensation.

Regarding Norwegian qualifications:

- Bachelor-level three or four year *faglaerer* for compulsory school and upper-secondary school would be recognised with professional experience as compensation

- A Norwegian pre-school teacher can teach grade 1, too. In Finland this recognition is not possible since class teachers with Master-level degree teach firstgraders.

The Swedish list

Also in Sweden a significant problem is, that there is a difference in the structure of the Nordic teacher training programmes. Where in Sweden there is a distinct difference between class teachers and subject teachers in compulsory school, this is not the case in some of the other Nordic countries.

- Compulsory schoolteachers from Norway, Denmark and Iceland can teach grades 1-10. In Sweden they are recognised as class teachers giving them teaching competence from 1-7 class. Swedish subject teachers teach from 4-9 class. They are more specialised than the compulsory schoolteachers from Norway, Denmark and Iceland and teach fewer subjects, in which they undergo education with more credits. Professional experience can compensate the difference in the scope of subject studies. Recently a Danish Folkeskolelærer has been recognised to teach 1-9 grades in Sweden. Teaching experience was accounted for. In this case unconditional recognition was issued in spite of differences between the teacher training programmes.
- Regarding Finnish upper secondary school teachers the duration of studies in each subject is unclear and therefore it is hard to establish a position on recognition. No Finnish teacher at this level has been rejected so far. Professional experience has been accounted for.

The Norwegian list

Norway raises the following problems about Danish qualifications:

- Danish compulsory schoolteachers do not distinguish between class teachers and subject teachers. It is therefore hard for them to satisfy the requirements for subject teachers in Norway, since the Norwegian programme is more specialised.

Regarding Iceland

- The Icelandic teacher training programme for compulsory school has duration of 3 years, while in Norway a similar programme lasts 4 years.
- The Icelandic upper secondary school teacher programme can qualify the teacher to teach in 2 subjects, but some teachers are qualified to teach in one subject only, while the upper secondary school teachers in Norway must teach two subjects.

Regarding Sweden

- The Swedish class teacher programme has teaching competence from 1-7 class, while the Norwegian almenlærere programme with teaching competence from 1-10 class.

Barriers of recognition

As shown above the barriers of recognition are related mainly to differences in structure of the educational systems and the various teacher training programmes. Nordic teachers are granted recognition, but in many cases not on the same level as they are in their home countries.

This particular barrier is an offspring of each country's organisation of the educational system, which is deeply rooted in national culture and tradition. The balance in assessing teacher qualifications from other Nordic countries is delicate, and the question to be asked is, when and how can one determine, if there are substantial differences between the programmes? Is it a substantial difference that Finnish compulsory schoolteachers are trained to teach grades 1-6 or 7-9, while Danish, Icelandic and Norwegian compulsory schoolteachers are trained to teach grades 1-10? And are the differences in ECTS-credits between Swedish subject teachers for compulsory school and Norwegian compulsory school teachers a substantial difference?

Differences in teacher training programmes as well as differences in the way of arranging compulsory education can be overcome by the compensating measures stated in the EU-directive. The true barrier here is lacking understanding of the directives and different ways of defining what comprises substantial difference. The differences in the content of education or profession need to be agreed upon. As mentioned this is combined with different ways of arranging compulsory education, class versus subject teaching. The EU directive gives possibility to use adaptation period or aptitude test to overcome this type of difference. In this respect barriers of recognition can be overcome. On the other hand if it is seen as a problem that teachers from countries with a unified compulsory teacher training programme from 1-10 class (Iceland, Norway and Denmark) cannot be directly recognised to teach in all classes in compulsory school in countries, which distinguish between class teachers and subject teachers in compulsory school (Finland and Sweden), the differences in the structure of the educational system and in the teacher training programmes constitute a barrier of recognition. In Finland this problem could partly be solved by issuing Danish and Norwegian compulsory school teachers recognition to teach one or two subjects of their specialisation on grades 7 -9 depending on the amount of studies in the subject/s taught. This far there has not been any applications yet.

Looking at the list of teacher training programmes, which each country has described as being problematic to recognise, it seems that the assessment of Nordic teachers is based on a favourable foundation for recognition, and thus the term substantial differences, which is the dominating assessment term in relation to the EU-directive, is interpreted in a non-restrictive sense. However discussions and definitions of the term substantial differences can be widened and made an object for common understanding within the Nordic countries.

The term substantial differences can be assessed in a different sense than differences in educational structure and teacher training programmes. It can also mean, that there are substantial differences in the demand of educational qualifications that each country requires for their teachers. Icelandic and Norwegian upper secondary teachers can be eligible to teach on the basis of a bachelor degree and 1 year of postgraduate training. In Denmark upper secondary school teachers are required to study 5 years and follow a 1-2 years postgraduate training programme dependent on, whether they can teach in one or two subjects. In Finland VET-teachers have a master degree, while Danish and Icelandic VET-teachers in vocational subjects have a VET-education, minimum 5 years of work experience and a short postgraduate training course.

Here again the EU directive gives possibility to use adaptation period or aptitude test as compensating measure. One has to notice that EU directive does not know an alternative to refuse recognition if the applicant is a fully qualified professional in the same profession and has completed a post-secondary education of at least three years.

The last barrier of recognition mentioned in this chapter is the fact, that some countries have more regulated teacher professions than other. This means, that the country, which regulates a specific teacher's profession, can ask for documentation of two years of relevant work experience from a Nordic citizen, whose teaching profession is not regulated by law. However, one does not have to ask for this documentation, if it is assessed, that recognition can be granted on the basis of the educational qualifications as well as professional experience. The latter seems to be the case when looking at the far from exhaustive list of single teacher training programmes, which are difficult to recognise directly.

Recommendations

We recommend, that the Nordic ENIC/NARIC offices continue discussions of the term substantial differences in order to find a common definition. Afterwards the evaluation of each single teacher training programme, which the single Nordic countries have had difficulties in recognising, should be revised on the basis of the definition of the term substantial differences to see if each single country still has problems in recognising specific teacher training programmes from other Nordic countries.

The group also acknowledges that due to structural differences in the educational system and between the teacher training programmes, it seems at present hard to obtain a situation, where all Nordic teacher training programmes can be directly recognised at the same level and with the same teaching competence as in their own country. At present we must rely on the application of the compensation measures in the EU-directive in order to be able to recognise teacher training programmes, which do not fit the national structure of teacher training programmes and the educational system.

The practice of recognition of teacher qualifications

After dealing with specific teacher training programmes, we now address the practice of recognition. Which principles and procedures are used in teacher recognition? What can we learn from each other's practice? We will in this chapter try to explore similarities and differences in the assessment of teacher qualifications among the Nordic countries.

The differences and similarities uncovered after a comparison is meant to expose good practice and to look into areas of further cooperation. By examining the assessment criteria and procedures we hope to learn from each other and to get a better understanding of how we can strengthen our cooperation.

The comparison is done on the basis of discussions at network meetings and a background document, where each country has described its procedures and criteria in relation to recognition of teacher qualifications. These country specific papers can be found in the appendix.

Assessment criteria for teacher educations

Professional recognition of teaching competence is based on EU directive 89/48/EEC. The admission level, duration of the programme, which subjects are studied, teaching competence and which level does the programme qualify to teach at, are essential criteria in all countries.

In addition to the EU-directive some countries operate within the standards set by the Lisbon convention on the Recognition of Qualifications concerning Higher Education in the European Region and the Recommendation on criteria and procedures for the assessment of foreign qualifications. Both documents stem from the European Council/UNESCO and they set the criteria for the principles of assessment of foreign qualifications for academic purposes and are adopted by most European countries.

This means that all the Nordic ENIC/NARIC offices are experts in assessments of foreign qualifications. However, recognition of teacher competence is different and is obviously based on the EU-directive and as described previously in some countries also based on the Nordic agreements on teacher qualifications. The focus of the EU-directive and the Nordic agreements are on recognition of competence. When dealing with recognition of teachers we look at the educational qualification to establish if it is a three-year higher education programme. We look at the competence, which derives from the diploma, the level the teacher can teach in and the subjects they can teach. Recognition can be and is usually granted to Nordic teachers on these grounds. If direct recognition based on a teacher training programme cannot be granted, we look at professional experience to establish, if teaching experience can compensate shorter duration of a teacher training programme. If this is not the case aptitude tests and adaptation periods are requested as described in previous chapters.

Under the chapters describing the legal framework of teacher recognition it has been described, how national requirements influence the assessment of foreign teacher qualifications. National laws, decrees and ordinances outline specific demands for teacher training programmes. In Sweden a subject teacher

for compulsory school teaches two subjects and must have studied 90 ECTS-credits in the main subject and 60 ECTS-credits in the second subjects. For upper secondary teachers in Denmark there are a number of subject related demands. For instance a geography teacher must have a specific field course or a sports teacher must have taken a didactical course in linking theory and practice.

National requirements may occasionally force the Competent Authorities to change the perspective of the assessments from an assessment of competence to an assessment of equivalence in the sense, that we are forced to look directly at credits of specific subjects within the teacher training programmes or to check, whether a specific course required in national legislation, is also included in the Nordic teacher training programme.

Teaching experience

As mentioned above the Nordic countries are very much in agreement when it comes to the basic principles of assessments of teachers' educational qualifications. However, there are differences in the criteria of assessing teaching experience as part of the overall assessment.

According to the EU-directive teaching experience can compensate for shorter duration of studies. If the duration of the foreign teacher programme is at least one year shorter than the equivalent in the host country the competent authority can ask for documentation of at least two years of teaching experience, and grant recognition, if the applicant can prove this. The principle is that two years of teaching experience can compensate for one year of shorter educational training. The length of the teaching experience, which the competent authority may demand is 4 years.

The Nordic competent authorities do not apply the same criteria, when evaluating teaching experience as part of an overall assessment of foreign teacher qualifications.

In Norway and partly in Iceland teaching experience can compensate for lack of pedagogical training. In Sweden and Denmark teaching experience can compensate for lack of both pedagogical training and lack of subject knowledge.

This means, that teachers in all countries can be recognised, even though the evaluation of their educational qualifications show, that they have fewer credits in pedagogic courses provided they have teaching experience at a relevant level.

In Sweden and Denmark teaching experience can also compensate for a gap of subject knowledge obtained through a teacher training programme, because it is assumed that teaching experience deepens the understanding of the subjects and teachers in most countries are obliged to follow continuing education as well as to follow the continuing development within the subjects they teach. In Finland professional experience is used as compensation for shorter duration studies without differentiating in which studies the shortfall would appear.

Recommendation:

The group recommends that a unified approach to recognition of teaching experience be agreed upon following the Swedish and Danish precedence of acknowledging that teaching experience can compensate for both lack of pedagogical training and subject knowledge. This would underline that professional experience not only can compensate for lack of pedagogical training.

The Finnish office is of the opinion that it is needless to differentiate between shortfall of pedagogical training and subject knowledge. According to the EU directive the differentiation between shortfall and lack of subject knowledge is not mentioned.

Acquired rights

When assessing foreign teacher qualifications the assessments are based on comparison with the current teacher training programmes in all countries except in Sweden. In Sweden foreign teacher qualifications can be based on comparison with teacher training programmes, which were valid at the time, when the foreign teacher graduated. The assumption is, that “older” teachers” have acquired rights to teach through teaching experience.

The notion of acquired rights is used in the other Nordic countries as well. However, it is still a fundamental demand, that the teacher training programme is a higher education programme with a minimum duration of 3 years. This means, that a teacher with a teacher training programme from a time, when this was a post-secondary but not higher education programme can be recognised in Sweden, if the teacher has documentation of teaching experience and still can teach in his home country, whereas this teacher would be rejected in the other Nordic countries.

This makes it obviously easier for teachers with older diplomas to gain recognition in Sweden, than in the other countries.

Recommendation:

The group recommends, that the Nordic countries open up for following the Swedish precedence on recognising older teacher training programmes on the basis of acquired rights. National teachers with older programmes, which are not higher education programmes, can still teach in their home countries, and Nordic teachers should have the same rights. This requires, that there is complete documentation of teaching experience, and that this teaching experience is not outdated but stems from recent times. The foreign teachers must still hold teaching competence in their home countries.

In real life this would mean that the older Swedish lågstadielärare programme with duration of 2½ years could be recognised, if continuous professional experience is documented.

Finland maintains, that the foreign teacher training programme must have a minimum duration of at least three years as stated in the EU-directive and in the Nordic agreement on class teachers. Swedish lågstadielärare get automatic recognition to teach grades 1-4 or on completion of additional studies all grades of compulsory education. It is very rare that teacher education in any country is shorter than three years of post-secondary education. That is why the Finnish office has not experienced any problems in referring to contemporary Finnish teachers' requirements.

Decisions

When foreign teachers apply for recognition all countries issue written statements as decisions. Denmark and Finland operate with three types of decisions:

- Recognition
- Conditional recognition
- Rejection

Sweden and Iceland operate with:

- Recognition
- Rejection

The Norwegian ENIC/NARIC office operates with recognition of foreign higher education qualifications.

Recognition

In the case of recognition a certificate is issued to the applicant. In all countries the certificates states the following data:

- Decision
- Name of Person
- Decision on teaching competence
- Information on teaching competence in host country (Norwegian practice)

In Denmark the letter contains additional information:

- Name of institution (university, college) (also stated in the Finnish letter of decision)
- Name of the degree
- Information of the status of the institution (officially recognised or not)
- Duration of teacher training programme
- Information on documented teaching experience (also stated in the Finnish letter of decision)
- Teaching competence in relation to subjects and grades in home country.

Rejection

In the case of rejection Denmark and Sweden do an assessment of the level of the applicants educational qualifications. Finland gives the applicant recognition decision on the level of qualification and possibly an assessment on the subject/s.

This is provided to give the applicant a decision, which can be used for either applying for admission to further studies/teacher training programmes or for seeking employment outside the teaching profes-

sion. In all countries information on how to become a teacher in the host country is provided to the applicants, who do not get full recognition.

The Norwegian practice

In Norway, NOKUT issues a general recognition document of foreign higher education. The applicant does not get a specific teaching certificate. However, if the applicant wants such a recognition, he or she has to apply for a recognition of specialty, i.e. his or her foreign teacher qualification is to be compared with a Norwegian teacher training program, by higher education institutions which are legally bound to recognize foreign higher education qualifications in relation to the programs they offer.

It is thus not possible to have teacher recognition certificate in Norway. Norway has recognition of foreign higher education qualifications and the Regulations Concerning the Act Relating to Primary and Secondary Education – Education Act/ Forskrift til Lov om grunnskolen og den videregående opplæringa (FOR 1999-06-28-722) which stipulates minimum requirements for qualified teachers at Norwegian schools.

Conditional recognition

Only Finland and Denmark operate with the term conditional recognition. A conditional recognition is given to applicants, who are trained teachers in their home countries, but who do not fulfil all the requirements to be granted recognition. This could be a teacher, who applies for teaching competence in the Norwegian compulsory school from 1-10 grade, but who only has teaching competence from 1-6 grade in her home country, or it could be a Finnish subject teacher trained to teach Finnish and English, who is seeking recognition in Danish compulsory school, where you must have teaching competence in two subjects relevant to the Danish compulsory school.

In a conditional recognition it is stated, which supplementary demands (adaptation period or aptitude tests) the applicant must fulfil in order to gain full teaching competence. This information is also required according to the EU-directive.

Iceland does not operate with the term conditional recognition. This has no practical implications, since all Nordic teachers are granted recognition. In Sweden conditional recognition is not used either. An Icelandic, Norwegian or Danish compulsory school teacher seeking recognition in Sweden will be recognised as class teacher being able to teach 1-7 grades in Sweden and not as subject teacher being able to teach 4-9 grades in Sweden, whereas they in their home countries have teaching competence in all subjects from 1-10 grade. If the applicants apply for recognition as subject teachers, and this is not granted, supplementary demands will be listed in the Swedish decision. If these teachers seek recognition at the same level, as they can teach in their home countries, they must be specific in their application stating that they also seek recognition as subject teachers. If they are recognised as class teachers, they will not get information on supplementary demands necessary to obtain recognition as subject teachers in compulsory school. As mentioned before Sweden has issued certification as a subject teacher in Sweden to a Danish Folkeskolelærer, where professional experience compensated for substantial differences between the teacher training programmes.

Recommendations

Certificates

There are differences in the certificates, which the Nordic countries issue to their applicants.

In the case of recognition it is recommended that the following data should be present in the letter of recognition/certificate:

- Decision of recognition
- Name of Person
- Decision on teaching competence in the host country
- Information on teaching competence in host country (Norwegian practice)

The Danish model is more detailed. However, in the case of recognition this degree of details is not necessary, since employers only needs basic data such as, which teaching competence is granted and of course the personal data.

Types of decision

In the case of a decision, where full recognition is not granted, it must be assured, that the supplementary demands necessary to gain full recognition is clearly outlined for the applicant.

This applies to a competent authority, which issues a teaching certificate to teach at a limited number of grades (i.e. from 1-7 grade) and when the applicant is actually seeking recognition to teach in other grades as well (i.e. 1-9 grades).

In the case of conditional recognition or rejection and where an assessment of level is done instead of a certification it is recommended to follow the Danish example concerning the details mentioned in the assessment of level. The Danish example with more detailed information understates the decision and thus provides the applicant with a better understanding of the decision and the background of the decision.

If for instance a Finnish class teacher is not granted recognition to teach all grades in Norway, it will be stated in the letter of decision, that the Finnish teacher has a teaching competence from 1-6 grade, while a class teacher in Norway must be able to teach 1-10 grades.

This means that the following data should be present in the letter of recognition:

- Decision
- Name of person
- Name of institution (university, college)
- Information of the status of the institution (officially recognised or not)
- Duration of teacher training programme
- Information on documented teaching experience
- Teaching competence in relation to subjects and grades in home country

In the case of full recognition is not granted it is recommended to do an assessment of the level of the applicant's educational qualifications, since this could help the applicant to seek admission to further studies or seek other types of employment. It also has the effect that the applicant does not only receive a negative response, but is actually receiving guidance in relation to her further career and job opportunities.

Compensation measures

If an applicant with teaching qualifications is not granted full recognition, and if the applicant does not have professional experience, which can compensate for shorter duration of the teacher training programme, the competent authority outlines the compensation measures, which the applicant must fulfil to get recognition.

Besides professional experience there are two types of compensative measures for Nordic citizens and EU- and EEA-citizens:

- Aptitude test
- Adaptation period

These measures are meant to compensate for differences in the content of the studies or in the profession. An adaptation period means, that teachers have the right to seek temporary employment as teachers. Qualified teachers supervise the teachers in an adaptation period. The maximum adaptation period, which the competent authority can demand, is 3 years. The adaptation period shall be assessed. In the EU directive giving detailed rules governing the adaptation period and its assessment as well as the status of a migrant person under supervision are left to the competent authorities in the host member states. This is why the procedures of assessment vary in different Nordic countries.

The foreign teacher can choose between an adaptation period and an aptitude test. An aptitude test is a test on matters of knowledge, which is essential in order to be able to exercise the profession. You cannot ask an applicant to take up further education to compensate for lack of qualifications, if the applicant is already qualified teacher. The applicant can choose to go to an aptitude test without following any previous courses. However, many applicants choose to follow courses to enhance their possibility of passing the test.

When reviewing practice within the Nordic countries it has become clear that not all countries comply with the EU-directive in this respect. Denmark and Sweden give the applicant a possibility of being recognised through an adaptation period and the possibility of choosing between an adaptation period and an aptitude test as required in the directive. In Denmark the tests are taken at the teacher training colleges or the universities. The tests are similar to tests/exams, which teacher students in Denmark take as part of their teacher training programme. All tests demanded are thus outlined on the basis of Danish teacher training programmes.

In Norway adaptation periods or aptitude tests are not applied.

In Finland adaptation periods or aptitude tests have not been used so far, but at the moment this possibility is being examined. The lack of this possibility has not, however, had any effect on recognition since all Nordic applicants fully qualified in the country of origin have been issued recognition either without any compensations measures or with professional experience as compensation for shorter duration of studies. Differences in the content of studies or profession have not been demonstrated.

In Iceland an applicant, who is not granted recognition, will be asked to fulfil further studies to obtain recognition as teacher. This is not in compliance with the EU-directive.

Recommendation

All countries must be in compliance with the EU-directive and thus be able to offer foreign teachers the choice between undergoing an aptitude test or an adaptation period in cases with substantial difference in the content of applicant's education compared with education in the host country or in the content of the profession between the country of origin and the host country. The completion of further studies must not be a demand to obtain teaching competence. The applicant must be able to go directly to an aptitude test.

This means that structures of setting up aptitude tests must be considered in all countries, where this is not possible today.

Control of compensation measures

The detailed rules governing the adaptation period and the aptitude test are left to the competent authorities in the host member states to decide. That is why the control of compensation measures varies from country to country.

In the case of adaptation period applicants in Sweden and Denmark must get an approval of the content of an adaptation period. In Sweden the content of the adaptation period is agreed on between the employer and the teacher according to a programme, which has been designed by several authorities in cooperation. In Denmark the employer must outline a supervised programme for the adaptation period, which must be approved by the Ministry of Education. After the conclusion of the adaptation period the applicant is asked to return to the competent authority with a written statement of the supervisor. The competent authorities can thus issue a certificate of recognition.

The control of adaptation periods is quite new in Denmark, so it is impossible to tell the effect of this. However it is advisable to control, what happens to foreign teachers undergoing an adaptation period. If these teachers are employed, one can argue that the employment is a control in itself. However, the competent authority gains knowledge of how foreign teachers function in their own national schools and useful knowledge is provided to improve the quality of assessments. Likewise foreign teachers are better off with a formal letter of recognition. Instead of presenting an assessment from a competent authority alongside a written statement from a supervisor at a school, the foreign teacher will be able to present a letter of recognition, which is easily understandable for all employers.

As shown above Denmark and Sweden provide structures of aptitude tests. However, there is no control of, what happens to teachers undertaking aptitude tests. In some cases these teachers get a Danish

teaching diploma, since the letter from the competent authority states, that they are recognised at the same level as Danish trained teachers once they have passed the tests. If this is the case the foreign teachers obviously do not need any further proof of their teaching competence. On the other hand if the foreign teacher is left with a conditional recognition and proofs of passed aptitude tests, the teacher is better off with a formal letter of recognition.

Recommendation

Control of compensation measures, adaptation periods and aptitude tests must be set up in all countries, since they provide the competent authorities with a better basis of assessing foreign teacher qualifications. Feedback from these compensation measures will help the authorities to adjust their assessments. At the same time formal letters of recognition can be issued and making it more clear for employers, that these teachers are fully recognised to teach in their host countries.

In this respect it must be emphasised that we are not talking about control of how the actual compensation measures are carried out, but rather on providing the successful applicant with a formal letter of recognition. The point is that supervising teachers in the case of adaptation periods send copies of their statement to the competent authority and that institutions in charge of aptitude tests inform the competent authority of the result of this test. A formal letter of recognition can then be issued.

Language assessments

Sweden is the only Nordic country, where language assessment is part of the recognition procedure. In Sweden the competent authority also recognises language proficiency and applicants must show proof of proficiency corresponding to what is required for an upper secondary school leaving certificate. This does not apply to Nordic citizens.

In Denmark, Norway and Finland the test of language proficiency is part of a process of seeking employment as teacher. It is thus the employers, who evaluate, if a foreign teacher has sufficient command of the teaching language. In Iceland language requirements are not mentioned in national legislation.

Test of language proficiency thus has no implications for recognition of Nordic teachers, since this is not part of the process of recognising Nordic teachers, but would only have implications in the case of future cooperation on recognition of teachers outside the Nordic countries.

External experts

The use of external experts in the assessments of teacher qualifications is rare within the Nordic countries. This is largely due to the fact that the Nordic NARICs themselves are the national experts in credential evaluation. However, in some cases an assessment is sent in hearing to external experts, which are universities and colleges.

In Denmark the Danish NARIC and competent authority has a right inscribed in the national legislation to send an assessment in hearing to educational institutions. The universities and colleges are obliged to answer within 6 weeks. No fee is paid to the external experts. The external experts statements are guiding, so the Danish NARIC has the final say in regarding the decision of the application.

The possibility of sending an assessment in hearing is not used very often in Denmark. In almost all cases the assessment can be completed using the normal principles of recognition. However, applications for recognition of upper secondary teachers sometimes require an assessment of equivalence, since national legislation has very specific demands in some subjects for the content of upper secondary teacher training programmes. For instance a specific field course is demanded for geography teachers.

In Norway NOKUT is free to seek advice from the higher education institutions in Norway and they also recommend applicants to seek academic recognition of their specific subjects at higher education institutions.

External hearing is not used often in Finland and Sweden. No national legislation provides legal right to ask a statement from universities in these countries. In Finland statements from the universities are sometimes asked, especially in cases when the applicant is not a fully qualified teacher in the country of origin, but has a higher education degree which together with teacher's pedagogical studies would give the applicant teaching competence. In these cases the statement from the university is needed to make sure that the applicant has sufficient knowledge of the subject taught. No fee is paid to the universities for the statement. Even though there is no time limit there has been no difficulties in issuing recognition within four months. The average time for a statement is 1,6 months.

In Iceland experts are part of the recognition procedure as described in a previous chapter meaning that external experts are involved in all cases of teacher recognition.

Recommendation

The use of external experts is in most cases not necessary. However, the Icelandic, Danish and Finnish experience shows that this can be a useful tool, when difficult applications are treated.

The group recommends that the possibility of using external experts be enhanced in all countries, either through national legislation or through other incentives.

Appeal procedures

In all countries except for Iceland there is a possibility of appealing a decision on teacher recognition.

In Norway the general recognition of foreign teachers is as described decentralised and consists of different processes. Regarding the assessment of the foreign teachers educational qualifications done by the Norwegian ENIC/NARIC-office an applicant can appeal to “Klagenemda”, which is a specially commissioned complaints board. If the applicant appeals a decision stating that he/she should be recognised according to the EU-directive, a EU-contact point in the Ministry of Education deals with these appeals. In Sweden and Finland the information on administrative and juridical possibilities of complaint is described in the decision. In Denmark it is simply described in the decision that there is no possibility of appealing the decision to another administrative authority meaning that appeals must be made to the competent authority.

In the EU-directive (article 8, point two) the appeal procedure is described like this: “ A remedy shall be available against this decision, or the absence hereof, before a court or tribunal in accordance with

the provisions of national law.” The European Union has issued a code of good conduct for competent authorities. According to this a decision should state the juridical and administrative possibilities of complaints on the decision and the deadline for filing a complaint.

Recommendation

It should be investigated if Iceland is complying with international legislation, when there are no possibilities of complaining on decisions.

Denmark and Iceland should adopt the Finnish and Swedish practice with full information on the applicant’s possibilities of appealing a decision.

Recognition procedures

Application procedure

All the Nordic NARICs are experienced in handling assessments of foreign qualifications, since all the offices are assessing educational qualifications from all over the world. As described in a previous chapter all offices base their assessment principles on international conventions and recommendations. This experience is obviously used, when assessing professional qualifications such as teacher qualifications.

Each country requires that the applicant fill out an application form. In the application form the applicant must provide information on his/her personal data and educational record.

In Sweden and Denmark a special application form for teachers is used. In this application form the applicant is also asked to fill in information about teaching competence, which subjects and which grades the teacher can teach. In Finland the application form contains the same information. In Denmark the teacher application form was introduced in May 2004 and based on the Swedish experience since 2001. A special application form for teachers has some advantages. The applicant must provide information on his teaching competence. This can sometimes and especially for older qualifications be hard to find out. Another advantage is that the majority of applicants when filling out this application form, realises that you must already be a trained teacher to get an assessment of professional qualifications. This may sound quite obvious for most people. However, all offices receive quite a large number of applications from persons with academic degrees, who for employment reasons have taken interest in the teaching profession, although they are not trained teachers in their home countries. When filling out an application form, where you are asked to provide information specifically on teacher training programmes and teaching competence, it becomes clear for some, though still not all, that you must be a trained teacher to apply for recognition. In other words a teacher application form can spare the single office for some groundless applications.

Recommendation

It is recommended that all countries develop a specific teacher training application form, since this provides better information on the applicant's background and can save each office from dealing with groundless applications. At the same time this would give the Nordic NARICs a more unified approach to teacher recognition.

The Finnish office has not felt any need for separate application form for the teaching profession. In the application form and its appendices all relevant information appears. In addition, in cases where full teacher recognition is not possible the person is issued a decision on the level of the degree based on the same application form with which the applicant originally applied for teacher recognition.

Documentation

The process of documentation of the applicant's educational and professional background is obviously an important part of a recognition procedure.

In all the Nordic countries the applicants are asked to provide:

- A filled in application form
- Officially certified copies of diplomas and transcripts
- Officially certified copies of statements of professional experience
- Certificate of competence from country of origin

All copies must be certified. Each country has the possibility of demanding to see the original document, if this is necessary for verification of the applicant's background.

In Finland the applicant must also send a copy of the passport. This is useful especially when different names appear on the applicant's certificates.

All the countries use a very uniform approach developed through years of experience of assessing educational qualifications.

Translations

The Nordic countries have agreed that Nordic citizens have the right to contact public authorities in their own language, i.e. the Nordic language convention 1.3. 1987. This means that the competent authorities in the Nordic countries should not ask for translations of documents from a Nordic citizen. This procedure is followed in Sweden and Finland. However, in Norway, Denmark translations of documents are used in the case of applications from Iceland and Finland and in Iceland Finnish documents must be translated.

In this respect Denmark, Iceland and Norway are not in compliance with the Nordic agreements. All offices are in a position with limited resources. Language proficiency is a core skill for all offices. Evidently we cannot have language competences in all languages and language proficiency in the language from countries, where you receive a lot of applications from is deemed more important than minor language areas. And applications from Finnish citizens are rare in Denmark and Iceland as are Icelandic applications in Norway.

In the case of teacher recognition it is apparent that foreign teachers must be able to use the language of the host country, although this is not required in the Icelandic legislation. In this respect also Nordic teachers must have a thorough command of the host country's language to seek employment as a teacher. Likewise an applicant from a Nordic country must be able to undergo an application procedure in the language, which he/she is seeking recognition to teach in.

Recommendation

It is a great strength when countries can treat applications in all Nordic languages. However, limited resources force each office to employ people with command of the main languages and it is thus often coincidental, if the same persons also have command of all Nordic languages.

The group therefore recommends, that the present situation continues, since experience shows that this is a theoretical rather than practical problem, because Nordic teachers always fill in their application forms in either a Scandinavian language or in English. If this situation is deemed untenable, a closer

look on the Nordic agreement should be taken in relation to teacher recognition, since teaching in all Nordic schools at compulsory and upper secondary level is conducted in the national language.

Finland is of the opinion that the Nordic language convention must be followed. The experts at the Finnish ENIC/NARIC office do not have the command of all Nordic languages, but if needed language services will be arranged as required in the Nordic language convention. This can be done in all Nordic countries.

Fees

The Nordic countries have different positions on fees. In Denmark and Norway there is no fee for application for teacher recognition.

In Finland and Sweden applicants are charged a fee. In Finland the fee amounts to 168 Euro. In Sweden the fee is 475 SEK (52 Euro). In Finland in case full recognition is not possible the applicant is given information on it and given possibility to withdraw application with no fee.

In Iceland you are only charged a fee, if recognition is granted. The fee is thus 5.000 ISK (57 Euro).

Charging of fees is instituted in national legislation.

Conclusion

The core of this project has been to identify barriers of recognition of Nordic teacher training programmes as well as analysing the practice of the recognition process in order to establish a more unified process of recognition based on best practice within the Nordic countries. Some of the barriers identified may be overcome by mutual agreements among the participating organisations of this project, while others may be put to the attention of the relevant decision makers. In case the national legislation is not in line with the directive the legislation needs to be revised.

Likewise the strengthening of Nordic cooperation within the field of teacher recognition has been a main object of the project. Again some aspects of this can be dealt with among the Nordic ENIC/NARIC offices, while other aspects require national reorganisation of the recognition process.

During the writing of the report recommendations have been put forward in each chapter. In the conclusion we will sum up the major points, which have been made by the project group and the recommendations, which the group has mutually agreed on.

A third common goal in this process has been to increase knowledge of the various teacher training programmes within the Nordic countries. This has not been debated during the report, since this has been an indirect result of our analysis of barriers and practice of teacher recognition. This must however not be underestimated. Each country has provided up-to date descriptions on the national teacher training programmes, which now are available for future assessments.

Another important outcome of the project is also not directly visible from the report. When dealing with barriers of specific teacher training programmes all countries have had bilateral discussions of the reasons, why specific teacher training programmes have been difficult to recognise in other countries. These discussions have had the effect, that some barriers of recognition have already been overcome, because of new information on the programmes in discussion have been provided.

In this respect the project has already had a positive effect on recognition of Nordic teachers. However, there are still barriers to overcome. Some of these may be addressed directly, while others seem to be structural barriers due to differences among the educational systems.

Powers of NORDIC ENIC/NARIC offices

As described in the first chapter the competence of the NORDIC ENIC/NARIC offices varies. Denmark, Finland and Sweden are competent authorities for professional recognition of foreign teacher qualifications. This is not the case in Iceland and Norway. In Norway the ENIC/NARIC-office is involved in professional recognition of teachers in the way that they are doing legally binding assessments, which employers must follow. In Iceland the ENIC/NARIC-office is not involved in recognition of teachers.

The situation in Iceland has shown to have few if any practical implications in Iceland, since the Icelandic competent authority recognises all other Nordic teacher training programmes.

The ENIC/NARIC-offices are experts in credentials evaluations and they are all tied together in big international networks. The offices are all committed to following the criteria of assessment laid down in the Lisbon Convention and in the Recommendation on criteria and procedures for the assessment of foreign qualifications from the European Council/UNESCO, while working with academic recognition. This expertise is valuable also in the case of professional recognition, since the experts in credential evaluation are very experienced in handling foreign documents, have access to an abundance of information, are experts on the structure of education in other countries and are used to working within a common European legal framework of credential evaluations. When the ENIC/NARIC office maintains the function as competent authority, it is secured that foreign teachers will undergo a standardised recognition process done by national experts in professional recognition and that each foreign applicant are treated according to international agreements.

In Norway the role of the Norwegian ENIC-NARIC-office should be discussed in the context of a centralisation of the process of professional recognition of teachers. It should be ensured that foreign teachers can undergo a process of general recognition of their teaching qualifications and that certificates of teaching competence can be issued to foreign teachers. This would also give foreign teachers a possibility of appealing unfavourable decisions on their teaching competence.

In the case of Iceland we recommend that the Icelandic ENIC/NARIC office be appointed members of the committees, which deals with recognising foreign teachers, or be given an advisory position.

This is of course a national decision in each country, which must be taken by the ministries of education.

Without underestimating the aforementioned we have to keep in mind that the principles of academic recognition and professional recognition differ from each other. The Commission's services (JM/bl - 9410t051, XV.E.2, appendix to the minutes of the meeting of coordinators) expresses it like this: "It is important to remember that the core of the directive is the identity between the professional activity which the migrant is entitled to exercise in his Member State of origin and that for which he seeks recognition in the host Member State. As such, the general system philosophy is entirely different from that which underlies academic recognition, where a detailed examination of the content, structure and level of the diploma presented for recognition may be necessary.

Legal framework

The EU-Directive

All EU- and EEA countries have agreed on the EU-directive, Council Directive 89/48/EEC of 21 December 1988 on a general system for the recognition of higher-education diplomas awarded on completion of professional education and training of at least three years' duration on. The directive is also the legal framework of professional recognition in all EU- and EFTA-countries and is thus the framework, which ties the Nordic countries to their European neighbours.

The Nordic agreements

It has been revealed during this project that the Nordic countries have very different positions on the validity and implementation of the Nordic agreements of teacher recognition.

Only in Denmark, Finland and Norway are the Nordic agreements applied in teacher recognition. In the other countries they are either not applied or deemed outdated by the EU-directive.

It is therefore vital to establish the validity of these agreements since Nordic teachers must be treated equally in all countries. Juridical experts must examine the relation between the Nordic agreements and the EU-directive. In this respect it must be investigated, whether it is in compliance with EU-legislation to have agreements favouring Nordic citizens.

If the Nordic agreements still should be applied it is essential, that they be revised. They stem from the early and middle of the 1980'ies and are in many cases out of line with the contemporary educational systems and teacher training programmes.

The concept of added value is vital to the future existence of the Nordic agreements. If these agreements do not have any added value compared to the EU-directive, it seems unnecessary to guard the agreements.

In the case of the agreement on Nordic class teachers, the Nordic agreement does have an added value for the applicant. However, this added value is out of line with the contemporary educational systems. The Nordic agreement on class teachers simply state that we should recognise any teacher training programme, which is recognised in their own countries and do not mention that these programmes must be a higher education programme. Although this as described is very seldom and strictly relates to older programmes, the situation might occur.

Another added value is that the Nordic agreement on class teachers state, that we must be able to recognise teachers with teaching competence from 1-4 class although this may be completely incompatible with other national systems.

In the case of subject teachers the Nordic agreements have no added value whatsoever for the applicant. On the contrary there are stricter rules of recognition for subject teachers in general subjects than in the EU-directive, and there is no mention of teaching experience being able to compensate for lack of educational qualifications.

In the Nordic agreements obligations concerning certain arrangements are set to the signatories to be decided nationally without outlining them in more detail. These are supplementary studies for class teachers with education less than 3 years, language testing and preparatory courses for these tests, subject related/pedagogical test in Denmark for class teachers during the first 4 years of service. It is recommended that these arrangements shall remain the responsibility of each country and not outlined in the revised agreement.

At the same time it must be recommended that the responsibility of the administration and control of these supplementary demands must be clarified and it should be discussed, whether these supplementary demands are still relevant demands.

In neither cases are the competent authorities except for Finland aware of, if these possibilities and tests in fact exist and there is no controlling if these requirements are in function.

If the possibility to complete supplementary studies in order to widen a restricted teaching competence and language tests still should exist, administrative procedures coordinated by the competent authorities must be implemented. However, it seems that the case of updating teaching competence for teachers only granted teaching competence from 1-4 grade is outdated in reality. Furthermore, one could argue that employers can deal with the test of language proficiency in the case of Nordic teachers or the same language tests, which foreign students must pass to be admitted to higher education programmes, can be applied.

Denmark has been granted a possibility to ensure competence of teachers from other Nordic countries by requiring teachers from other Nordic countries to undergo professional examination within the first 4 years of employment. The Danish exception demanding a subject related/pedagogical test should be abolished, since it is not fair, that some countries can apply extra demands for recognition and the background for applying this supplementary test no longer seems valid.

Further action

All of the above mentioned recommendations concern the structure of recognition of foreign teachers and the legal framework of teacher recognition. The participants of this project must carry on the recommendations to the relevant authorities and discuss the progresses in this respect at future meetings.

Barriers of recognition of specific teacher training programmes

The analysis of the recognition of specific teacher training programmes within the Nordic countries has shown that only a few programmes are problematic to recognise and that the climate of recognition within the Nordic countries seems both fair and favourable for the applicants.

The barriers of recognition of specific teacher training programmes originate in the fact that the educational systems and teacher training programmes differ within the Nordic countries. This causes that Icelandic, Norwegian and Danish teachers can be recognised as class teachers in Finland and Sweden and be given teaching competence from 1-6 or 1-7 grades, while they in their home countries have teaching competence from 1-10 grades.

In other cases the barriers are rooted in substantial differences in the educational qualifications. An Icelandic or Norwegian upper secondary teacher may have a bachelor degree plus one years of postgraduate teacher training, while an upper secondary teacher in i.e. Denmark must have a master degree and two years of postgraduate teacher training.

Finally some countries have more regulated teacher training programmes than other countries. If we follow the EU-directive the competent authority can demand documentation of two years of working experience from an applicant, where the teacher training programme in question is not regulated. This is however not mandatory to ask for two years of working experience before recognising the application.

In short some of these barriers for direct recognition seem hard to overcome, since there are concrete and substantial differences among the programmes. This means that we in some cases must demand either a substantial period of professional experience or if this does not lead to recognition, a demand for a long adaptation period or extensive demands to aptitude tests must be required. However, a continuing discussion among the Nordic ENIC/NARIC offices on the concept of substantial difference may in future eliminate some of these concrete barriers. This has as mentioned already been the case, since some teacher training programmes have been taken off the list due to discussions during this project.

Assessment of teacher qualifications

As shown above there are differences in the way each Nordic country applies the use of the EU-directive and the Nordic agreements in the professional recognition of teachers. These differences in the principles of recognition must be followed by further discussions and strengthened cooperation, before we can speak of a unified Nordic standard of professional recognition.

However, the analysis of the process, and procedures of professional recognition has that in the practical work with professional recognition of teachers, the Nordic countries follow a rather unified standard and that the differences related to the process and procedures are not substantial differences. In this respect the foundation for strengthening the cooperation of recognition among the countries is on solid grounds.

Some differences in the practice have been revealed, which we will summarise here. All of the differences lie within the competence of the Nordic ENIC/NARIC offices to implement insofar it is remembered that we do not all issue legally binding assessments.

Assessment of teaching experience

Professional experience can compensate for shorter duration of studies according to the EU-directive. However, this is not implemented in the same fashion in all countries.

All countries agree on that teaching experience can compensate for lack of pedagogical training. It is only in Denmark and Sweden, where teaching experience also can compensate for lack of subject knowledge. The idea is that teaching experience forces teachers to follow the latest developments within their teaching subjects and that most teachers undertake further training during their professional career.

It is therefore recommended that all countries accept that teaching experience also can compensate for lack of subject knowledge.

Acquired rights

Only in Sweden is the concept of acquired rights inscribed in national legislation. This means that foreign teachers can be assessed by comparing their teacher training programme with older teacher training programmes meaning the programmes from the same period, when the foreign applicant was educated.

All the other countries compare with the contemporary programmes. It is recommended that the concept of acquired rights is considered in all countries insofar the foreign teacher still holds teaching competence from his own country and have been employed as a teacher in recent times.

Decisions

It is recommended that the countries issue standardised certificates of competences. In the case of conditional recognition the data on the certificate should be expanded meaning that more information should be given providing a better understanding of the background of the decision. For details please refer to the chapter on assessment of teacher qualifications.

Not all countries have introduced the concept of conditional recognition, which is stated in the EU-directive. In the case of Nordic teachers this is in Sweden mainly due to the fact that teachers applications are either recognised or rejected and to the fact that compulsory school teachers in Denmark, Iceland and Norway have teaching competence throughout all grades in compulsory school. This has the effect that teachers applying for teaching competence often are recognised as Swedish class teachers, while they might also be applying for competence as subject teachers and are thus not given information on supplementary demands, which must be fulfilled to become subject teachers, if they do not clearly state, that they also seek recognition as subject teachers.

We therefore recommend, that procedures for determining, which teaching competence the Nordic applicant applies for, is fully outlined, so supplementary demands will be stated in the letter of decision, if full recognition is not granted.

Compensation measures

According to the EU-directive compensation measures may be outlined for teachers, who are not fully recognised. The compensation measures are professional experience, and if this does not lead to recognition, and an adaptation period or an aptitude test as described previously. The applicant must be given a choice between two possibilities: An adaptation period, a temporary supervised teaching position and an aptitude test, a test of specific subject related or pedagogical theoretical qualifications. The two types of compensating measures may not be applied cumulatively.

In Norway and Iceland applicants are not offered the possibility of an adaptation period. In Norway this is due to the decentralised structure of the teacher recognition process as described in previous chapters. In Iceland an applicant will be asked to take further studies. This is not in compliance with the EU-directive, where it is stated that an applicant should be able to take an aptitude test without undergoing further training.

Regarding the aptitude test only Denmark and Sweden has a structure of putting up these tests. In Denmark this is done at teacher training courses and universities, where the applicants are asked to take tests, which are part of Danish teacher training programmes. In Sweden no aptitude tests have been taken so far.

We recommend that all countries implement the choice between an adaptation period and an aptitude test, since this is inscribed in the EU-directive. This is a decision, which must be taken by the relevant authorities.

In Finland the fact that the possibility of requiring an adaptation period or an aptitude test is non-existing has had no effect in recognition since this far all fully qualified teachers from other Nordic countries have been issued recognition either without any requirements or with professional experience as compensation. Finland has not yet received any Nordic applications where there would have been a need for compensation because of substantial differences in the content of education or profession.

Control of compensation measures

In Sweden and Denmark applicants must return to the competent authority after termination an adaptation period. This is not the case in Finland and of course not in Norway and Iceland, since adaptation periods are not applied.

Administrative systems of controlling adaptation periods and aptitude tests must be put up in all countries. This means, that the competent authorities must be given information on the completion of adaptation periods or passing of aptitude tests. This has the benefit for the applicant that they will receive a formal certificate of competence and the competent authority will also be able to follow the effect of their decisions giving them a more solid ground for making future assessments, when they receive an assessment from the supervisor or the result from an aptitude test.

This is a decision of the ministries of education.

The same recommendations must be put forward in the case of aptitude tests. Denmark is the only country, where aptitude tests have been taken, but there is no control of the results of these tests. It can thus not be checked if the demands of the tests are fair.

External experts

In Denmark it is inscribed in national legislation that universities and colleges can be used as external experts in recognition cases. This is done without fees and the institutions must answer within 6 weeks. In Norway higher education institutions are obliged to do assessments of academic degrees, which can be used in the process of professional recognition.

External experts are seldom used in the other Nordic countries.

However in specific cases this can be helpful, and we therefore recommend that the ministries of education follow the Danish example or introduce other incentives for using institutions as external experts in countries, where this is not yet the case.

Appeal procedures

Only in Sweden and Finland are the applicants given full information on the possibilities of appealing. According to the code of good conduct for competent authorities issued by the European Union the administrative and juridical possibilities of filing a complaint must be given to the applicant.

Assessment procedures

The procedures of assessments are also very similar among the Nordic countries, since international agreements and codes are followed.

Only minor differences occur. We recommend the use of a specific teacher application form. Sweden has used this for many years and this is lately introduced in Denmark based on the Swedish experience that a special teacher application form provides better information on teaching competence and reduces groundless applications for teaching competence from applicants, who are not trained teachers.

Finally the analysis of the practice of the teacher recognition process has shown, that it is only in Finland and Sweden, where you can fill in an application in all Nordic languages. This is of course a great advantage and in fact also part of a Nordic agreement. However, each office must economise with resources, and when you in Iceland or Denmark only receive very few applications from Finnish teachers, it seems out of proportion to guarantee language expertise in all Nordic languages on behalf of i.e. Arabic and Chinese language proficiency. Especially in the case of teacher recognition, where a foreign teacher must be able to teach in the national language of the school, a foreign teacher must be able to apply for teaching competence in the language of the host country.

The Finnish office is of the opinion that the Nordic language convention must be followed and the applicant be given the right to use his own language. External language expertise can be used in these cases.

Further action

The recommendation on the principles and process of teacher recognition can be dealt with at future meetings within this group. The actions related to all the specific recommendations can be discussed and be put into practice during our future cooperation.

The recommendations concerning the legal aspects of the principles and process of professional recognition of teachers must be put forward the relevant authorities in the Nordic countries and the result of these discussions coordinated at future meetings.

Improved information

An offspring of this project has been the exchange of information on the structure and content of each country's teacher training programmes. Valuable information has been changed and misunderstandings have been cleared paving the way for easier recognition of Nordic teacher qualifications.

Up-to-date information on the various teacher training programmes is vital in the recognition process. The participants of this project have exchanged descriptions of current and older teacher training programmes.

It is important to keep updating this information. We therefore recommend, that a common Nordic website be developed with information on the admission level and structure of the teacher training programmes and the teaching competence, which each programme qualifies the teacher to.

This way we would be able to keep information on teacher training programmes updated. Furthermore this could act as a pilot project, which could be presented as good practice, to competent authorities in all the EU- and EFTA-countries with the purpose of examining, if such a website could be developed in a European context on the basis of Nordic practice.

Strengthened cooperation

This project has already had a positive effect on Nordic cooperation in the fields of teacher recognition. The project group has through discussions and the background material to this report gained a far better knowledge of Nordic teacher training programmes.

We have also verified, that the Nordic ENIC/NARIC offices by and large agree on recognition procedures.

The concept of a common and unified Nordic area of teacher recognition does however not seem to be a possibility in the near future. The organisation of the recognition process and thus the powers of the Nordic ENIC/NARIC offices, where some act as competent authorities and others do not, is a bridge, which at present cannot be overcome. Likewise national requirements in the Nordic teacher training programmes influence the outcome of teacher recognition and must be dealt with by each national competent authority.

The project has as mentioned already had a positive effect on Nordic cooperation. The establishment of the group itself has provided us all with better access to information on teacher training programmes.

The road is already paved for future projects. Having discussed Nordic teacher training programmes the group might turn towards a discussion of the teacher training programmes in the new EU-member states. Study visits can be coordinated and the group can still function as a valuable professional network in relation to recognition of foreign teachers.

There is still work to be done with the implementation of the recommendations of this project. Here we will meet again to discuss advances and problems in this respect. New issues will turn up and be debated and during this project it has been proved, that the Nordic countries in all cases do not have a mutual understanding of the entire process of recognition of foreign teacher qualifications, but are willing to learn from each other.

Appendix

Comparison of professional recognition of Nordic teaching qualifications in the Nordic countries

	Iceland	Denmark	Finland	Norway	Sweden
Competent authority/ies	Ministry of Education	<i>Center for Vurdering af Udenlandske Uddannelser, CVUU</i> Uddannelsestyrelsen/ Ministry of Education from May 2003	<i>Opetushallitus/Tutkintojen kehit-tämispalvelut</i> , National Board of Education, NBE /Qualifications Unit from June 1997	<i>Nationalt organ for kvalitet i utdan-ningen, NOKUT/ Seksjon for utenlandske utdanning,</i> / The Inter-national Recognitions Unit from 2003, before that NAIC	<i>Högskoleverket/ Avdelningen för bedömning av utländsk utbildning,</i> The Swedish National Agency for Higher Education from 2000
External expert	committees appointed by the MOE, one for each school level: in cases where applicant's education is much shorter than that required in Iceland	advisory statements from edu-cational institutions, inscribed in legislation, 6 weeks time limit	advisory statements from HEI's, average time 1,5 months National Advisory Board ap-pointed by the MOE: policy issues and guidelines	HE institutions	no such arrangement
The document on recogni-tion: - status - content - scope	a licence that issues permission to use the title (leikskólakennari, grunnskólakennar or fram-haldsskólakennari) and the right to teach testing of language proficiency not included	recognition: equal right to apply for teacher posts as with the Danish qualification or conditional recognition with certain studies as compensation for full competence or right to apply for teaching in one sub-ject statement that the decision cannot be appealed to any other administrative authority testing of language proficiency not included	recognition: level of the qualifi-cation in the Finnish structure and authorisation to teach, possibly with professional experience as compensation or conditional recognition: level of the qualification in the Fin-nish structure and authorisation to teach, compensation meas-ures outlined (professional experience this far only) appealing instructions testing of language proficiency not included	NOKUT's general recognition, binding to the employer: level and scope (in credits) of the qualification, if it is a teacher's degree appealing instructions testing of language proficiency not included	recognition, possibly with professional experience as compensation, yields the right to teach or rejection with recommenda-tions for further study in order to improve possibilities to achieve recognition, a new application without fee, appeal-ing instructions testing of language proficiency included
Regulation and testing of proficiency in the language of instruction	no regulation	compulsory school teachers: not regulated, the school leader decides, upper secondary school: regulated in ministerial order proven either in CVUU's deci-sion or later	regulated by the decree in compulsory and upper sec-on-dary education, in liberal educa-tion and basic art education no regulation proven by a certificate of an official language test	regulation? "Bergenstest" level II, given by universities	regulated by Högskoleverket proven by certifiante from upper secondary school or certain studies in HET's or TISUS
The main requirement for recognition	fully qualified teacher status in the country of origin	the applicant must hold a relevant (educational level, class level) teacher qualification	fully qualified teacher status in the country of origin to teach at the same level/subject/s	the level and scope of the qualification	the applicant must have a for-ign teacher education that qualifies him/her for the teach-ing profession in the country of origin
The comparison base	current teacher training pro-grammes	current teacher training pro-grammes	current teacher training pro-grammes	current teacher training pro-grammes	current or previous teacher training programmes

