POLICIES AND TOOLS FOR COMPARING AND RECOGNISING VET QUALIFICATIONS IN EUROPE
An overview

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CEDEFOP

A great deal of additional information on the European Union is available on the internet. It can be accessed through the Europa server (http://europa.eu).

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Contents

Tables

CHAPTER 1.
Introduction

With the EU's working-age population projected to decline by 57.4 million by 2100 (European Commission, 2023b) and around 24 million individuals aged 20-64 having unmet employment needs (Eurostat, 2024), it is crucial to unlock the potential of the Single Market by fully realising the free movement of workers, as outlined in the Union of Skills' third pillar (European Commission, 2025). Intra-EU labour mobility can address labour shortages by tapping into a substantial reservoir of untapped talent, including those with competences acquired in different contexts, across borders, or through formal, non-formal, and informal settings. To facilitate this, it is essential to easily compare and recognise qualifications across countries and institutions, enabling individuals to access employment and learning opportunities that match their skills and competences.

The goal of comparing qualifications is to identify differences and similarities between programmes, enabling skills accumulation and recognition across institutions and borders. When leading to recognition, such comparison is vital for making the best use of existing education and training systems and facilitating lifelong learning. Recognition, in particular, unlocks access to the labour market, ensuring individuals' skills and qualifications are valued by employers. However, defining 'recognition' in the context of vocational qualifications is complex due to varying national concepts and standards (BRAVO, 2024).

For this study, we adopted the definition from the 2017 Council Recommendation on the European Qualifications Framework (EQF), which sees 'formal recognition of learning outcomes' as granting official status by a competent authority to acquired learning outcomes for further studies or employment (Council of the European Union, 2017). This includes awarding qualifications, validating non-formal and informal learning, and granting equivalence or credit. Although 'competent authority' often refers to a state-empowered body, we broaden the scope to include employers who may act as recognition bodies in the non-regulated labour market.

The recognition of foreign qualifications is increasingly necessary, as the number of regulated professions in EU Member States has risen from 5 400 in 2016 to 5 700 in 2023 (European Court of Auditors, 2024). While recognition is mandatory for regulated professions, its necessity in the non-regulated labour market varies. In some countries, employers assess foreign qualifications during recruitment, while in others, services are available for employers or qualification holders to have qualifications assessed or recognised, providing useful information for recruitment

or career progression purposes. Despite the Copenhagen process's 2002 emphasis on transparency and recognition, significant barriers persist, hindering access to suitable employment and limiting companies' access to a diverse talent pool. The lack of a unified European approach and the complexity of recognition processes contribute to these barriers.

Challenges in comparing and recognising qualifications extend beyond conceptual issues, involving technical, procedural, and political aspects. Political reluctance to change is an obstacle, as removing recognition barriers requires legislative and financial interventions. Institutional priorities often overshadow individual needs, and the emphasis on national programmes, which may be considered unique, creates trust issues. Accepting differences between qualifications requires re-evaluating entrenched beliefs about the value and quality of specific educational and training systems, which can create tensions.

Technical challenges include a lack of standardised, up-to-date information on qualifications and unclear recognition processes. The shift towards learning outcomes-based comparisons is crucial, but varying practices across institutions and countries pose significant barriers. A fragmented landscape of regulations and tools, along with incoherence among developed transparency tools, further complicates the process (Bergan & Blomqvist, 2014; Cedefop, 2024b; European Commission, 2017; Schuster, Vincenza Desiderio & Urso, 2013).

Overcoming these challenges is vital for establishing a fair and transparent qualification recognition system, essential for empowering individuals, driving societal progress, and enhancing labour market efficiency. This paper provides an overview of policies and tools for comparing and recognising VET qualifications in Europe, focusing on EU transparency tools and national stakeholder perspectives. We identify three interconnected decision-making levels: macro (European frameworks), meso (national/regional implementation), and micro (individual impact). At the macro level, European initiatives set the broader context for comparison and recognition. The meso level involves national or regional implementation, with a ReferNet survey offering insights into national practices. Finally, the micro level focuses on individual experiences in accumulating learning and having qualifications recognised, involving diverse actors from authorities to employers. This paper aims to support stakeholders in making informed decisions about recognition practices, tools, and methodologies, ultimately reflecting on the need for a common European approach to the recognition of VET qualifications. Although we have not collected individual-level data, we reference existing evaluations of transparency tools to provide insights.

CHAPTER 2.
EU policy background and Cedefop's contribution

The 1957 Treaty of Rome laid the groundwork for removing barriers to free movement by introducing regulations for mutual recognition of qualifications for self-employed individuals and service provides (Article 66). However, it did not address salaried workers, who are the primary beneficiaries of VET. The issue was discussed extensively until the 1963 Council Decision, which formally acknowledged harmonisation of basic requirements and mutual recognition of qualifications as objectives of Community action for salaried workers (Koelink, 1992). The term 'comparability' was introduced in the 1974 Council resolution.

In this context, Cedefop's founding regulation in 1975 underscored its central role in addressing the recognition of diplomas: 'The Centre's activity in this respect shall deal in particular with the problem of the approximation of standards of vocational training with a view to the mutual recognition of certificates and other documents attesting completion of vocational training'. In 1978, Cedefop started, in cooperation with the Commission and the Advisory Committee for Vocational Training, to work on recognition of qualifications, proposing a common framework for training levels. The proposal envisaged a division into five levels: semi-skilled workers, skilled workers, technicians, higher technicians and graduates. In practice the work included comparing around 50 occupations in following sectors: electrical/electronic, hotel/catering, construction, vehicle repair and agriculture, horticulture and forestry sectors (Koelink, 1992).

Building on Cedefop's work on comparing 50 occupations, the Council Decision of July 1985 addressed the comparability of vocational training qualifications among the Member States of the European Community, and Cedefop was tasked to compare qualifications for nineteen occupational sectors, including around 200 occupations, by the end of 1992 (Koelink, 1992). The cornerstone of this decision was the introduction of five training levels, each with key activities, serving as a general framework for levels of attainment. These levels combined structural elements, required inputs, and job descriptions.

The 1985 Decision marked a significant shift in focus from mutual recognition to comparability, based on the assumption that the occupational requirements could be formulated in terms of occupational profiles (Koelink, 1992). This approach involved providing information to ensure clarity as to the types and levels of knowledge and skills certified by particular qualifications, rather than attempting to standardise training and harmonise statutory and administrative regulations across

all countries. By acknowledging the diversity of national education and training systems, this approach was seen as a more pragmatic and realistic solution. In contrast, mutual recognition was considered necessary 'where the legal position must be watertight' (Koelink, 1992, p. 28), such as in the case of regulated professions where Member States have a duty to protect the public interest (e.g. public health). However, even in these cases, the process of establishing common frameworks has proven to be time-consuming and complex, as exemplified by the lengthy processes for architects (18 years) and pharmacists (16 years), which has led to the realisation that mutual recognition may not be a feasible or practical solution for every occupation (Gordon, 1999).

Following the 1985 Council Decision, Cedefop embarked on establishing a foundation for achieving comparability in vocational training qualifications. To support this initiative, terminology charts and glossaries were developed alongside various studies. This effort resulted in complex arrangements among Member States, Cedefop, and the EC Commission. Consequently, comparability tables were created for each occupation, detailing general descriptions, titles, types of institutions, and legal responsibilities for certification (Koelink, 1992). Such an input-based approach, focused on pedagogical processes and curricular content, struggled to account for the diversity and complexity of individual education and VET systems across Europe (Brockmann, Clarke & Winch, 2009). As a result, the work based on these comparisons proved to be inefficient, labour-intensive, and did not yield the expected outcomes. The methods and approaches outlined in the 1985 Council Decision began to diverge from those utilised by Member States, highlighting the need for a more adaptive and flexible approach.

In the 1990s and early 2000s, the perspective changed, and transparency emerged as a key consideration. The Council Resolution of December 1992 raised doubts on whether the work on comparability produced sufficient clear information about qualifications necessary to facilitate the free movement of labour, and instead proposed focusing on transparency of qualifications as a new direction. In this context, transparency was defined as comprehending the content of qualifications, linked to labour market recognition, and giving rights of progression to an occupation or to further training (Gordon, 1999). This refocusing implied an acceptance that achieving total comparability or equivalences was not feasible and highlighted a distinction between providing information and frameworks – a task that could be accomplished at the EU level – and issuing statements of equivalence, which remained the prerogative of national governments (Gordon, 1999).

Establishing transparency was seen as a way to decentralise recognition, fostering a bottom-up approach that focused on giving the necessary information to the different actors themselves, a process that led to a more concerted attempt to develop common reference levels and credit transfer systems (Brockmann, Clarke

& Winch, 2009). Decades of effort by the European Community to enhance transparency and recognise VET qualifications and competences resulted in the development of the EQF. In 2004, the Commission and Council emphasised that: 'The European labour market cannot function without a European framework to stand as a reference for the recognition of qualifications' (Council of the European Union, & European Commission, 2004, p. 1). The emphasis was on ensuring that National Qualifications Frameworks (NQFs) are developed based on the 'mutual trust' of Member States, with the focus on comparing qualification systems rather than individual qualifications.

This progression led to the 2008 adoption of the Recommendation on the EQF, which replaced the 1985 Council decision. The EQF introduced eight common reference levels based on learning outcomes – statements of what a learner knows, understands, and is able to do – rather than specific education and training structures or institutions. By focusing on learning outcomes instead of learning inputs (such as the duration of learning experiences, number of courses, or type of institution), the EQF provides better and neutral reference point for national and sectoral qualification systems operating in different timeframes and institutional arrangements. The EQF was intended to promote transparency of qualifications and enhance labour mobility, encompassing all qualifications.

Specifically, since 2008, European cooperation in the field of transparency has intensified, resulting in significant advancements at both national and European levels. This collaborative effort has led to the development of European tools that enhance transparency in education systems and qualifications while promoting a learning outcomes-based approach (Cedefop, 2024b). Building on these transparency tools and elements for comparing qualifications, as well as ongoing conceptual work, Cedefop continues to work on the comparability and recognition of qualifications and learning outcomes across Europe (Cedefop 2016; 2021; 2022).

The recent launch of the European Commission's (2025) Union of Skills strategy is the latest effort to improve skills utilisation by enhancing cross-border recognition of qualifications. This strategy marks a shift towards rethinking recognition, focusing on removing barriers to worker mobility in unregulated professions and acknowledging competences gained outside formal education. Through the Skills Portability Initiative, it is envisaged introducing new legislative proposals, building on existing transparency tools and promoting common European formats for interoperable digital credentials, while also aiming to establish a common European framework for the automatic recognition of study qualifications and learning periods abroad in school, VET, and higher education.

CHAPTER 3.
Main objectives and methods of the study

This paper provides an initial mapping of policies and tools used by EU Member States to ensure the comparability and recognition of VET qualifications. The analysis focuses on two main areas: (1) identifying and evaluating the most relevant EU tools for comparing and recognising VET qualifications, including their strengths, weaknesses, and conceptual basis for comparison; and (2) examining the state of play and mechanisms for comparing and recognising VET qualifications across countries. Thus, the following questions were formulated to guide the study:

(a) How have existing EU transparency tools facilitated the process of comparing and recognising VET qualifications in Europe, and what opportunities exist for their enhancement?

(b) How do national authorities and stakeholders across Europe currently compare and recognise VET qualifications?

(c) What common themes and concepts can be identified that could help develop a practically oriented framework for comparing and recognising VET qualifications for diverse purposes in Europe?

By exploring these questions, this study aims to enhance the understanding of how foreign VET qualifications are compared and recognised in Europe, while identifying strategies to support countries in this endeavour. The study also investigates the application of EU transparency tools and evaluates current recognition practices to refine key concepts in the recognition of VET qualifications. Its goal is to establish a strong foundation for improving the recognition of VET qualifications for diverse purposes, including for further studies and work across Europe.

We should acknowledge that this paper primarily addresses the recognition of VET qualifications, as many developments have taken place for the recognition of higher education qualifications ([1]), while recognition of VET qualifications has historically received less attention (Cedefop, 2024b). Although higher VET (EQF levels 5-8) is not the primary focus, it is considered as an important aspect of comparison and recognition, often presenting specific challenges. As argued by Cedefop (2019), this sector is often not clearly defined, overlaps with continuing VET or higher education, and is not typically considered a distinct sector. Descriptors for the short, first, second and third cycles of the Framework for Qualifications of the European Higher Education Area correspond to the learning outcomes of EQF levels

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([1]) See for example: The Bologna Process and the European Higher Education Area.

5-8. According to Bravo (2024, p. 12), distinguishing between vocational qualifications at higher levels and professional higher education can be challenging, particularly with EQF level 5 qualifications that are classified differently across countries.

In our paper we use systematically the general term VET qualification to refer to VET, which according to the Cedefop glossary, involves learning aimed at acquiring the knowledge, skills, values, and competences necessary for specific occupations or, more broadly, for success in the labour market. When discussing specifically the 2005 Professional Qualifications Directive, we can also refer to professional qualifications. Moreover, we concentrate mostly on qualifications obtained within Europe, rather than looking at qualifications obtained outside Europe.

The methodological approach to address the research questions involved a combination of a mapping and analysis of existing policy tools and a survey targeting ReferNet members. The mapping exercise involved analysing policy tools developed since 2000 for comparing and recognising qualifications, focusing on eight main policy initiatives. Some of these initiatives were recently analysed by Cedefop (2024b) from the perspective of transparency and transferability of learning outcomes, while this paper delves deeper into them. A SWOT (Strengths, Weaknesses, Opportunities, Threats) analysis was employed to assess each initiative. Each initiative was evaluated for its utility in recognising foreign qualifications, highlighting potential areas for further development. These opportunities mainly depend on the level of implementation at national or institutional levels. Special attention was given to the concepts used across the initiatives, examining the consistency and application of these concepts.

The selection and analysis of these eight initiatives was primarily based on their significance in the comparison and recognition of foreign qualifications, as well as personal experience of the authors, general awareness, and, in some cases, the extent of their implementation. Additionally, a key criterion for their selection and analysis was the availability of EU-level evaluations to support the analysis. These evaluations provide a comprehensive assessment of the initiatives' effectiveness and implementation across Member States.

The first category of tools examined include legal and soft law documents covering the recognition of foreign qualifications. These include the 2005 Professional Qualifications Directive (PQD), the 1997 Convention on the Recognition of Qualifications concerning Higher Education in the European Region (Lisbon Recognition Convention, LRC), the 2018 Council Recommendation on promoting automatic mutual recognition of higher education and upper secondary education and training qualifications and the outcomes of the learning periods abroad, as well as the 2012 Council Recommendation on the validation of non-

formal and informal learning. While the Council Recommendation on validation is not directly linked to foreign qualifications, it is included due to the conceptual similarities and the overlap between validation and recognition processes.

Among the soft law documents of a different nature, which do not specifically focus on foreign qualifications, are the 2008 Council Recommendation on the European Qualifications Framework (EQF) for lifelong learning and the Europass Decision. According to Cedefop (2024b, p. 14), the EQF and NQFs have become increasingly significant for recognising qualifications. Europass is included in the analysis primarily due to elements linked to documentation (such as Certificate Supplements) and its role in providing detailed information on national qualifications and learning outcomes.

The European Learning Model (ELM) is also included, since it is a relatively new digital tool with potential for making comparison of qualifications and learning outcomes easier. Similarly, ESCO (European Skills, Competences, Qualifications and Occupations) offers a multilingual classification system for skills, competences, qualifications, and occupations, serving as an important common language for comparison purposes.

To delve deeper into the practical application of these tools, as well as to understand how comparison and recognition work in Europe, a survey was developed and addressed to ReferNet. ReferNet is a network of institutions created by Cedefop to provide information on national VET systems and labour markets. Refernet coordinators were asked to consult key stakeholders involved in recognition procedures in the respective countries. In total, 28 countries responded.

Data analysis involved textual analysis of responses per country and combined findings across all countries for each question, with clarifying questions sent to some countries when necessary. Additional materials provided by countries or mentioned in responses were also considered, and existing knowledge of authors supported the analysis. This comprehensive approach enabled a thorough understanding of the available tools and their practical application, ensuring a detailed analysis of the processes of comparison and recognition of qualifications. The responses were analysed by following main themes: governance, EU and national tools, comparison and recognition practice, monitoring and follow-up and Artificial Intelligence and/or language models used.

CHAPTER 4.
Mapping of transparency tools for comparing and recognising VET qualifications

There are several European initiatives and tools designed to enhance transparency and support the comparison and recognition of foreign qualifications and learning outcomes. We have identified and selected the tools that we believe are most important and commonly used in these processes. Tools we have selected were mentioned also in several responses to the ReferNet survey. Our analysis of these tools focuses on four key aspects: their strengths, weaknesses, opportunities, and threats (SWOT). By strengths, we refer to the ways in which a specific tool can effectively facilitate the recognition of qualifications. Weaknesses, on the other hand, highlight the challenges and limitations faced by different stakeholders when implementing the tool. Opportunities refer to the potential for further development and enhancement of the tool to better support recognition processes in the future. Lastly, threats encompass the external factors and risks that could undermine the effectiveness of these tools. We have adopted a broad interpretation of the term 'tool', encompassing legal texts, soft law documents, and digital tools. Following the SWOT analysis, lessons learned for comparing and recognising VET qualifications are discussed.

4.1. SWOT analysis of transparency tools

This section presents a SWOT analysis of key transparency tools used within the European context, examining their strengths and weaknesses, exploring the opportunities they present, and identifying potential threats that could impact their effectiveness. Within these different dimensions, we also discuss the conceptual foundations that inform the design and implementation of these tools. By analysing these factors, we aim to gain a comprehensive understanding of the current landscape of transparency tools that facilitate the process of comparing and recognising VET qualifications across Europe.

4.1.1. Directive 2005/36/EC on the recognition of professional qualifications
The purpose of the Professional Qualifications Directive (PQD) is to facilitate mobility by defining the rules allowing professionals qualified in one Member State to practice their profession in another Member State.

The PQD's strengths include a comprehensive support and monitoring framework involving the European Commission, a Committee made up of

representatives of the Member States, national coordinators, competent authorities, and assistance centres. The European Commission oversees implementation and publishes statistics ([2]) to ensure transparency. Member States are asked to send a report to the Commission on the application of the system every two years. Legal requirements for the procedures provide predictability and consistency for applicants, with a specific list of documents that competent authorities can request. The Directive mandates electronic procedures to streamline processes, and reliable information is available through the Internal Market Information System, complemented by a User Guide for citizens (European Commission, 2020).

The challenges connected to the implementation of the PQD have been highlighted in previous evaluation reports. Most recently, the European Court of Auditors (2024) argued that while the recognition of professional qualifications in the EU is an essential mechanism, it is sparsely and inconsistently utilised. Moreover, some concepts of the PQD appear difficult to understand or implement at the level of Member States or by competent authorities. The Evaluation of the PQD by the European Commission (2011, p. 24) noted, for example, that the concept of 'regulated education' is not sufficiently clear, especially in relation to education policies.

Furthermore, the process of updating qualifications for the automatic system of professional recognition is considered 'cumbersome' and there are no deadlines for the Commission to complete it (European Court of Auditors, 2024, p. 5). The classification of economic activities, which was established many decades ago, also makes the identification of the professions benefiting from the system of recognition based on professional experience 'quite difficult' (European Commission, 2011, p. 6). Some competent authorities have also noted that the classification of education levels 'can lead to an inaccurate matching of qualifications', which can hinder the recognition process (European Commission, 2011, p. 33).

Despite some challenges, the PQD provides opportunities for professionals to practice their profession in another Member State, and the Directive covers all qualifications when recognition is required for access to a regulated profession. The recognition systems, including coordination of minimum training conditions (doctors, nurses responsible for general care, dentists, veterinary surgeons, midwives, pharmacists, architects), professional experience (crafts, trade, and industry) and general system (all other regulated professions), provide a framework for the recognition of professional qualifications.

Specifically, for professions under the minimum training conditions, also called automatic recognition, the PQD provides detailed requirements, including the length

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([2]) See for example: Single market and competitiveness scoreboard and Regulated professions database: professionals moving abroad

of study (in some cases also in hours), subjects to be studied (if needed, divided into theoretical and clinical), previous studies required for entering certain studies, as well as types of awarding institutions and degree titles. Regarding recognition based on professional experience, no comparative assessment is required; instead, proof of professional experience is sufficient to establish the right to work in the same profession in the receiving country. Finally, for the application of the general system, professional qualifications have been grouped on five levels which are based mainly on the type and duration of training, referring to formal education and training from general primary and secondary education to post-secondary education of more than four years duration.

The concept of 'substantial difference' plays an important role in the implementation of the PQD. A substantial difference refers to significant discrepancies in education and training, or variations in professional activities, that may necessitate compensation measures, such as an aptitude test or adaptation period in case differences cannot be compensated by knowledge, skills or competences acquired in the course of professional experience or through formally validated lifelong learning. Although the PQD does not provide a definitive definition of 'substantial difference', it outlines certain key elements that can contribute to such a difference, including education and training that covers substantially different subject matter or differences that pose a risk to public health or safety, thereby highlighting the importance of carefully assessing the qualifications and experience of applicants to ensure they meet the necessary standards for practicing their profession in the host country.

The PQD faces several threats that could undermine its effectiveness and hinder the free movement of professionals within the EU. One major threat is the risk of inconsistent implementation across Member States, which could lead to protectionism and restrictions on free movement. The increasing complexity of professional qualifications and the need for continuous updates to reflect changing labour market needs also pose a challenge. Rapid technological advancements and the emergence of new professions may require the PQD to adapt quickly to remain relevant. External factors, such as global economic trends and shifting geopolitical landscapes, can disrupt the recognition of professional qualifications, further undermining the effectiveness of the PQD. To mitigate these threats, it is essential to ensure consistent implementation, invest in ongoing updates and revisions, and foster international cooperation to promote good and consistent practice in the recognition of professional qualifications.

4.1.2. Convention on the Recognition of Qualifications concerning Higher Education in the European Region

The Lisbon Recognition Convention (LRC) covers higher education qualifications and qualifications giving access to higher education. So, its scope is limited to those VET qualifications, which give access to higher education in the country or origin. The main principle of the LRC is that qualifications should be recognised unless the receiving party can show the existence of substantial differences between general requirements for access between countries. If substantial difference exists, the assessment should seek to establish whether alternative or conditional recognition may be granted.

One of the significant strengths of the LRC is its widespread ratification, with endorsement from all Member States. This widespread acceptance establishes a robust foundation for its application. The implementation of the LRC is further supported by strong structures, including the Intergovernmental Committee, secretariats of UNESCO and the Council of Europe, and active ENIC and NARIC networks. These structures, alongside ample supporting documentation formally adopted by the Committee, can ensure the even implementation of the LRC.

Furthermore, the subsidiary text, 'Recommendation on Criteria and Procedures for the Assessment of Foreign Qualifications' (UNESCO, & Council of Europe, 2010), enhances the recognition process by asking recognition authorities to consider learning outcomes where clearly documented, thereby broadening the scope of assessment beyond mere comparison of curriculum content. This approach allows for a more nuanced and flexible recognition process.

The implementation of the LRC faces certain weaknesses. The five main principles of the LRC, as defined in the Bologna Process indicators ([3]), have not been specified in national legislation in all participating countries. According to the most recent Bologna Process Implementation Report (European Commission. EACEA. Eurydice, 2024, pp. 71-72), this inconsistency is notable even among EU Member States, where some countries have not implemented all the principles. The BRAVO Project highlights another challenge: a 'grey zone' of education and recognition practices due to differing definitions and approaches to the LRC (BRAVO, 2024). Depending on the categorisation of a foreign qualification and the relevant national qualification, vocational qualifications may fall under the scope of the LRC in some cases, and in some cases not. This ambiguity affects qualifications at EQF level 5 and 6, which can be considered either Higher Education

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[3]   (1) applicants have right to fair assessment; (2) there is recognition if no substantial differences can be proven; (3) legislation or guidelines encourage comparing of learning outcomes rather than programme contents; (4) in cases of negative decisions the competent recognition authority demonstrates the existence of substantial difference; (5) applicant's right to appeal the recognition decision.

or Higher, Technical, and Tertiary Vocational education, depending on how the education system is structured and how recognition is carried out (BRAVO, 2024, p. 23).

The LRC offers opportunities to extend its principles to VET qualifications. During the BRAVO Project, it was observed that some countries apply the principles of the LRC to the recognition of VET qualifications (BRAVO, 2024, p. 23). ENIC/NARIC offices in many countries are already working on VET qualifications, and the Commission Recommendation on the recognition of qualifications of third-country nationals encourages Member States to consider NARIC's competence in this area (European Commission, 2023a, p. 19). Competent authorities are also encouraged to consider learning outcomes and use National and European Qualifications Frameworks as part of the assessment process (UNESCO, & Council of Europe, 2010). The 2010 Recommendation further clarifies that the qualifications of approximately equal level may show differences in terms of content, profile, workload, quality and learning outcomes (UNESCO, & Council of Europe, 2010). These differences should be considered in a flexible way, and only substantial differences in view of the purpose for which recognition is sought should lead to partial recognition or non-recognition of the qualifications. This flexible approach and the usefulness of qualifications framework in comparing qualifications was further emphasised in the Recommendation on the use of qualifications frameworks in the recognition of foreign qualifications (UNESCO, & Council of Europe, 2013).

Certain threats could undermine the effectiveness of the LRC. Disparities in the categorisation and recognition of vocational qualifications across different countries might lead to inconsistent application of the LRC principles. If substantial differences are not assessed accurately or any differences are considered substantial, it could result in partial recognition or non-recognition of qualifications, affecting individuals' access to higher education or in some cases to the job market. The Explanatory Report to the Convention (UNESCO, & Council of Europe, 1997) warns that substantial differences between qualifications, such as the length of study or specific curriculum content, should be both substantial and relevant to warrant non-recognition.

4.1.3. Council Recommendation on promoting automatic mutual recognition of qualifications and learning periods abroad

The Council Recommendation on promoting automatic recognition (Council of the European Union, 2018), sets an ambitious goal for Member States to establish the necessary steps by 2025 to achieve significant progress towards automatic mutual recognition for the purpose of further learning. While the primary focus of this Recommendation is on higher education, it also encompasses VET, highlighting the broader scope of its intended impact. This initiative highlights the importance of

recognition across all qualification levels and has stimulated discussion on the
subject.

Despite the definition of 'automatic mutual recognition of a qualification'
provided in the Recommendation, there has been considerable conceptual and
practical confusion. The Evaluation report (European Commission, 2023c, 2023d)
reveals that stakeholders in both higher education and secondary education and
training do not fully understand the meaning of automatic recognition as defined by
the Council Recommendation. Furthermore, they struggle to distinguish it from other
models of recognition that currently exist within the EU. This lack of clarify presents
an opportunity to elucidate the concept of automatic mutual recognition to
stakeholders, explain its legal implications, and clarify how the Council
Recommendation aligns with other policy developments in recognition. Efforts to
clarify these concepts could involve using systematic, well-defined, and established
concepts linked to the realities of education and labour market actors.

The confusion is further compounded by complexities in the recognition
landscape. There is difficulty in differentiating between the automatic recognition of
qualifications, which permit access to the next level of education, and automatic
admission to specific educational programmes (European Commission, 2023c;
2023d). Educational institutions set their own criteria for admission, adding another
layer of complexity.

Given the multifaceted nature of recognition, including varied practical and
political conditions, different purposes, and the decentralised competence for
making recognition decisions among numerous actors, the conceptual and practical
confusion is understandable. However, this situation underscores a threat to
achieving the Recommendation's aims if not addressed systematically and
comprehensively. Nevertheless, the Recommendation has succeeded in making the
current situation more transparent and has stimulated discussions on the importance
of recognition across all qualification levels, even if it has not fully achieved its
intended aims.

4.1.4. Council Recommendation on the validation of non-formal and informal learning

The Recommendation on the validation of non-formal and informal learning (Council
of the European Union, 2012) describes validation as a process by which an
authorised body confirms that an individual has acquired learning outcomes,
measured against relevant standards. This process includes four key stages:
identification of learning outcomes, documentation, assessment, and certification
which may lead to a partial or full qualification. To facilitate the implementation of
this Recommendation, there are support structures in place, including Cedefop, the
EQF Advisory Group, and various topical, regional, and local networks of

practitioners. Moreover, Cedefop resources such as the European guidelines for validating non-formal and informal learning (Cedefop, 2023) and the European inventory on validation of non-formal and informal learning (Cedefop, 2024), are regularly updated to provide comprehensive guidance. There are many elements hinting to the similarities between validation and recognition. Aims for validation are very similar to the purposes of recognition: sometimes obtaining full or partial qualification, access to labour market or a wider pool of skills or qualifications available for employers.

Despite these strong foundations and progress, there are challenges inherent in the validation process. Disparities in the availability of validation arrangements persist across countries and sectors, and validation is not available for all qualifications and connections between validation in different contexts remain limited. (Cedefop, 2024a, p. 14). Data from the European inventory suggests for the need to address the issue of transferability of validation outcomes to support individual learning and employment careers. Validation in educational context differs from validation carried out in enterprises or civil society organisations. A strategic approach to validation implies a cross-cutting approach allowing labour market actors, civil society organisations and education and training institutions to focus on individuals (Cedefop, 2024a, p. 20).

There are significant opportunities to create synergies between validation and recognition. Both processes rely at least partly on learning outcomes and intersect with other policy areas and initiatives, such as qualifications frameworks, quality assurance, lifelong learning, digitalisation, and labour market developments. Aligning similar procedures and principles could allow validation and recognition to jointly assess all prior learning, offering a cohesive process that benefits individuals. The latest European guidelines (Cedefop, 2023) underscore the need to address challenges such as validity, reliability, scalability, and cost, which are pertinent to both validation and recognition. Additionally, a clear definition of the domains of knowledge, skills, and competences can enhance the quality of standards or reference points used in validation (Cedefop, 2023).

Validation and recognition processes face similar challenges. They are labour-intensive, requiring considerable time, expertise, and reliable information. Institutional fragmentation and protectionism pose additional threats that could impede effective implementation. Discussion concerning standards and reference point for both validation and recognition is important. National qualifications seem to be the most common reference point for comparing and recognising qualifications, in some cases also for validation, but determining the 'closest (national) qualification' can be challenging. This difficulty highlights the necessity for qualifications to be based on clearly expressed learning outcomes, which can also aid in establishing reference points for comparison. It would be important to foster synergy between

validation, comparison, and recognition processes not least for the benefit of individuals. These processes are fundamentally about valuing all forms of learning and acquired experience.

4.1.5. Council Recommendation on the European Qualifications Framework for lifelong learning

The Recommendation on the establishment of the European Qualifications Framework (EQF) for lifelong learning was adopted by the European Parliament and Council in 2008 (European Parliament, & Council of the European Union, 2008). It specifically aimed to facilitate the recognition of learning outcomes. In 2017, this Recommendation was updated to further enhance its objectives (Council of the European Union, 2017). A key feature of the EQF, particularly in terms of recognition, is the existence of levels and level descriptors, which effectively integrate both horizontal (breadth) and vertical (depth) learning outcomes. Additionally, the criteria and procedures for referencing National Qualifications Frameworks (NQFs) to the EQF are essential for building mutual trust in each other's qualifications.

The implementation of the EQF Recommendation has made significant strides. Cedefop provides support for the implementation and carries out comparative studies and analysis, including country-specific biannual reports monitoring NQF developments on national level. According to the Cedefop website, all Member States have formally linked their NQFs to the EQF, with 11 countries having updated their referencing reports. The EQF's comprehensive coverage of all qualification levels and types is a noteworthy strength, as it facilitates the recognition of qualifications. Evaluations have echoed positive feedback, with the European Commission's (2013, p. 9) evaluation highlighting the EQF's role in 'improving the transparency and recognition of skills and competences'. The EQF's ability to serve as a 'translation grid' (European Commission, 2024a, p. 4) enhances its utility, making it a widely accepted reference point among institutions that work with qualifications.

Despite its strengths, the EQF's utilisation as a benchmark for comparing qualifications from other countries is not entirely clear. Many countries use the EQF as a tool for recognition (e.g. European Commission: Directorate-General for Employment, Social Affairs and Inclusion, Ockham IPS & Visionary Analytics, 2024 pp. 80-81), but the specifics of its application beyond the identification of the level of a qualification remain ambiguous. The process of understanding how and under what conditions the EQF is used in comparing and recognising foreign qualifications requires further research. Factors such as the credibility and transparency of the process for placing national qualifications in the NQFs and the referencing process need to be better understood to enhance the EQF's effectiveness.

The EQF presents opportunities to further enhance the transparency, comparability, and portability of qualifications. EQF is a tool acknowledging and promoting connections with a wide range of policy areas. In Cedefop's analysis of coherence among 14 transparency tools, the EQF stands out as the initiative with the most cross-sectoral and cross-policy connections at the European level (Cedefop, 2024b). The evolution of digital information, such as connected NQF databases using standardised language, can further bolster the EQF's role in making qualifications visible and comparable on a large scale. The 2017 EQF Recommendation emphasised coherence and synergy between the EQF, NQFs, and other transparency and recognition tools, which could be leveraged to strengthen mutual recognition across Europe. There has been some progress, even if more can be done. According to Cedefop study (2024b) the EQF has moderate synergies with developments connected to quality assurance, credit systems, and the recognition of qualifications, revealing opportunities for greater integration.

A potential threat to the EQF's effectiveness lies in the variability of its application across different countries, which could undermine mutual trust. The question of whether the EQF and NQFs can systematically and widely make qualifications' contents visible and comparable remains open. Additionally, the rapid pace of technological and educational change demands constant updates to ensure the EQF remains relevant. If these challenges are not addressed, the EQF's role as a benchmark for recognition might be compromised, affecting its credibility and acceptance.

4.1.6. Europass, European Learning Model, and European Skills, Competences, Qualifications and Occupations

In parallel to the EQF, the EU has developed several key tools to enhance the transparency and recognition of skills and qualifications across its Member States. Among these, Europass, the European Learning Model (ELM), and the European Skills, Competences, Qualifications and Occupations (ESCO) framework play significant roles. Each of these initiatives seeks to facilitate the understanding and comparability of qualifications, supporting the broader goal of fostering mobility and employability within the EU. While each tool offers unique strengths, they also face challenges and present opportunities for further development and integration within the European education and employment landscapes.

The current Europass framework, established by the 2018 Decision of the European Parliament and Council, provides a robust platform for web-based information on qualifications and services (European Parliament, & Council of the European Union, 2018). Launched in 2020, the Europass portal offers tools that support the recognition of qualifications. Citizens can reflect their qualification levels in their Europass profile, CV, and Diploma or Certificate Supplements. Furthermore,

Europass plays a crucial role in enhancing the transparency and understanding of skills and qualifications across Europe. According to European Commission (European Commission, 2024c), Europass is coherent with the broader policy context and has strong synergies and technical interoperability with EU tools and initiatives in employment, education, training, and guidance.

The ELM complements Europass by establishing a single multilingual vocabulary for learning, which fosters interoperability with EU tools like EQF and ESCO. The latest version of the ELM, launched in June 2023, promises to aid in comparing and recognising VET qualifications, especially when integrated with digital credentials. This advancement offers a significant opportunity to standardise data across languages and systems, thereby enhancing the model's impact on qualification recognition.

ESCO, on the other hand, provides a detailed multilingual classification of skills, competences, and occupations, facilitating a 'common language' for professional contexts. Currently, ESCO describes over 3 000 occupations and nearly 14 000 skills linked to these occupations. While ESCO's detailed classification is a strength, it also presents challenges for comparing and recognising foreign qualifications due to its focus on skills and occupations, without a levelling approach. This lack of a structured levelling system makes it difficult to use ESCO as a reference point for national or international qualification comparisons. ESCO is utilised specifically by employment agencies, under the Implementing Decision (European Commission, 2018) referring to the EURES Regulation (European Parliament, & Council of the European Union, 2016).

Despite these challenges, there are significant opportunities for Europass, ELM and ESCO to enhance their impact. The integration of digital short descriptions of qualifications into Europass, potentially evolving into digital credentials, presents a promising development. Encouraging more stakeholders to adopt Europass as a 'standard profile tool for learning and jobs in the EU' could strengthen its role in EU initiatives and mobility programmes (European Commission, 2024b, p. 8). For ESCO, its multilingual and detailed classification system has the potential to be further developed to better align with national qualifications frameworks, enhancing its utility in recognition processes.

Building an integrated digital system at both EU and national levels remains a challenge specifically for Europass. This integration requires visible digital interaction between the EQF, NQFs, and individual qualifications, which could be hindered by technological, bureaucratic, or policy-related barriers. For ESCO, the lack of a legal basis may impede its broader acceptance and integration into formal recognition processes. Additionally, the variability in how ESCO is perceived and used across Member States could threaten its effectiveness in promoting transparency and recognition of qualifications and learning outcomes. Ensuring

coherence and interoperability among these tools and frameworks is essential to maximising their potential benefits for comparing and recognising qualifications.

4.2. Lessons learned on the use of transparency tools

The transparency tools analysed share common policy objectives: facilitating mobility and supporting the comparison and recognition of qualifications for lifelong learning and labour market access. These tools play a crucial role in enhancing the portability of skills and qualifications, which should be the ultimate goal. While lifelong learning is gradually becoming a reality (Cedefop, 2024b), recognition processes have not kept pace, creating a gap that needs to be addressed.

Legal macro level frameworks like the PQD and the LRC are vital components of this ecosystem. However, their effectiveness depends on coherent implementation across Member States, at the meso level, to prevent inconsistencies that could hinder free movement and mutual recognition. The PQD is adopted in all Member States and there is universal participation in the LRC. However, applying the LRC to VET qualifications is not straightforward, while this has not been an explicit concern for the ENIC-NARIC network (BRAVO, 2024). These frameworks must be complemented by additional tools, especially digital ones, and cooperative arrangements to enable seamless information provision and exchange and establish best practices across Europe. Transparency tools, such as Europass, provide reliable information provided by national stakeholders, that fosters trust among stakeholders, including in foreign qualifications. Despite achievements, evaluations reveal that not all tools are well-known among end-users, posing challenges, particularly for employers and sometimes even citizens. Therefore, the question remains whether the basic conditions of trust between qualification systems on micro level are fully established. Challenges in recognising VET qualifications suggest that there is still room for improvement in building this trust.

Several shortcomings persist. European transparency tools are often designed for formal education and training sectors, operating within 'silos' rather than building bridges (Bjørnåvold & Villalba-Garcia, 2025). This sectoral focus and conceptual ambiguities can undermine individuals' needs for flexible progress and create difficulties for recognition. The challenge lies in overcoming these 'silo' constraints and fostering integration across sectors. Concepts such as 'regulated education', 'benchmark' or 'reference point', and 'substantial difference' within these frameworks need further clarification and simplification to ensure they are uniformly understood and applied.

The conceptual basis of transparency tools also contributes to difficulties in comparing and recognising qualifications. Definitions for terms like (automatic/formal) recognition or qualification vary and are not fully systematic. The

same term may be used differently across education sectors and qualification levels, reflecting the 'silo' developments. Discussions on validation and recognition are often conflated, with the two being viewed as either nearly synonymous or distinctly separate. The distinctions between concepts such as learning outcomes, skills, competences, and qualifications - all crucial for recognition - are not always clear.

To address these issues, transparency tools cannot be isolated from broader policy initiatives and cooperative structures that aim to enhance the comparison and recognition of qualifications. For VET, initiatives like the Copenhagen Declaration in 2002, the Osnabrück Declaration in 2020 and subsequent European cooperation efforts are significant. The European Commission's 'Union of Skills' communication in 2025 emphasises facilitating the portability of skills and qualifications as a key deliverable at multiple levels. Building future actions on past developments is crucial for their success.

To maximise the benefits of these tools, it is important to foster synergy and coherence among them. Aligning validation and recognition processes, while leveraging digital advancements, can enhance their effectiveness. The integration of digital credentials, microcredentials, and interoperability with frameworks like the EQF can facilitate better comparability and understanding of qualifications, prerequisite being that consistent language and terms are being used. Additionally, addressing the conceptual and practical confusion in recognition processes specifically on micro level, including discussion on recognition criteria and the 'substantial difference', is crucial for achieving the intended objectives. By integrating these initiatives into a cohesive framework, transparency tools can be more effectively utilised to support the recognition and mobility of qualifications across Europe. This approach will ultimately contribute to the realisation of a unified European space for lifelong learning and increased opportunities to work, ensuring that these tools reach their full potential for the benefit of all citizens.

CHAPTER 5.
ReferNet survey findings

In this chapter, we provide a synthesis of the main findings from a survey addressed to ReferNet members. The aim of the survey was to provide an overview of comparison and recognition practices in Europe, delving deeper into the practical application of the transparency tools discussed earlier. The scope of the survey was qualifications defined as part of each country's VET system, including post-secondary and higher VET qualifications. After providing a thematic analysis of survey results, key conclusions and insights from the survey are highlighted.

5.1.   Thematic analysis of survey results

This section presents a detailed thematic analysis of the ReferNet survey results, focusing on three main themes: governance structures, the implementation of transparency tools at the national level, and common comparison and recognition practices. Specifically, it examines the diverse frameworks countries employ to manage VET qualification recognition, evaluates the effectiveness of European transparency tools in various national contexts, and highlights common practices and criteria, offering insights into the challenges and opportunities for improving the recognition of VET qualifications across Europe.

5.1.1.   Governance structures

The governance landscape for comparing and recognising qualifications across Europe is characterised by considerable diversity, especially when it comes to VET qualifications. Various ministries, competent authorities, information sources, and advisory bodies are responsible for these processes, with specific roles differing by country. In all countries, the ENIC-NARIC networks play a crucial role in facilitating the recognition of qualifications for access to higher education by providing reliable information, offering guidance on academic recognition, and fostering cooperation among national information centres. Under the Professional Qualifications Directive (PQD), numerous competent authorities across Europe are tasked with ensuring that professionals meet the necessary standards to work in regulated professions. Meanwhile, employers play a significant role in the unregulated part of the labour market, as they often assess themselves the qualifications of potential employees. The involvement of many different stakeholders leads countries to simplify these structures to create a more cohesive approach. Some countries focus on reducing

the number of authorities, while others aim to enhance information services, promote data sharing, and encourage cooperation.

Countries differentiate their comparison and recognition procedures of foreign qualifications based on the intended purpose, whether for access to the labour market or further study. If the comparison or recognition is done in view of further study, it is also called academic recognition based on purpose, not the level or type of qualification to be compared. When the purpose is access to labour market, the differentiation extends to regulated versus non-regulated professions. Recognition for access to regulated professions is referred to as de jure recognition, whereas recognition for non-regulated professions is termed de facto recognition. These distinctions, however, can blur in practice, especially when assessments intended for one purpose are used for another. Some countries also grapple with defining non-regulated professions, which may still be subject to training regulations, but not necessarily subject to an authorisation to practice. In some cases, it appears that the purpose for which the qualification has been recognised appears in the decision made, at least if the decision is made based on the PQD.

Collaboration with industry and labour market actors is a key feature in many countries. For example, in Norway, the recognition scheme for VET qualifications for EQF level 4 was developed with social partners. In Germany, individuals seeking recognition of their foreign professional qualifications must be familiar with a corresponding German reference occupation. Despite the complexity of the comparison landscape, countries express a desire to streamline processes and adopt a more comprehensive approach.

The recognition of foreign VET qualifications presents mixed messages. Some countries report limited demand and anticipate little change, while others observe a growing need and welcome the focus on VET. In a few countries, it was reported that the procedures for comparing VET qualifications are similar to those used in higher education. However, challenges persist, particularly in differentiating vocational qualifications at higher levels and aligning them with professional higher education. Some countries have specific criteria for comparing qualifications on these levels. Moreover, the concept of 'higher VET' remains undefined, with no common European definition, indicating an area where further exploration is required.

5.1.2. Implementation of transparency tools at national level

When it comes to the use of European transparency tools at the national level, countries were free to report on the tools that they deemed most important within their specific contexts. Generally, countries outlined their procedures for recognising qualifications for regulated professions under the Professional Qualifications Directive, with minimal remarks on any difficulties encountered. The Lisbon

Recognition Convention frequently appeared in responses, especially concerning higher education, and some countries reported applying its principles to the recognition of VET qualifications as well.

The Council Recommendation on Automatic Recognition was mentioned in several responses, predominantly in relation to higher education. Although the Recommendation includes VET, it seems to have been overlooked in many countries, possibly because it pertains only to further study purposes, limiting its perceived utility for VET. Additionally, as noted in the Progress Report (European Commission, 2023, p. 9), there is ongoing confusion regarding the definition of automatic recognition.

Many countries identified the EQF and NQFs as key tools for supporting comparison. One country stated: 'The EQF and NQFs are relevant instruments for comparing foreign vocational qualifications. They inspire confidence and provide a common language'. However, the application of these tools was not always clearly articulated, especially when comparisons extend beyond merely the level of qualifications. One country indicated challenges when 'there is a discrepancy between the learning outcome level and the educational level in regard to national qualification'. Challenges also arise when NQFs encompass non-formal qualifications or microcredentials, which may exceed the recognition authority's mandate. As noted, 'an EQF or NQF level should not be directly interpreted as a synonym for a formal vocational qualification'.

Europass was frequently mentioned, with its Diploma and Certificate Supplements recognised as important documents for facilitating comparison, despite some gaps in the availability of the latter. Generally, Europass was seen as a valuable digital tool for accessing information on qualifications and several countries, like Belgium, Cyprus, Czech Republic, Denmark, France, Germany and Latvia, mentioned their own activities in providing information and supplements. Linked to Europass, several countries highlighted the significance of access to national qualifications registers or databases.

The European Skills, Competences, Qualifications and Occupations (ESCO) framework was mostly discussed in relation to EURES, Europass, national databases, and qualification standards. Opinions were divided regarding ESCO's potential as a comparison tool, with many not perceiving it as supportive of recognition due to its level of detail and, in some cases, its incongruence with national system. Regarding the European Learning Model (ELM), some countries reported initiating mapping exercises, while others, like Sweden, noted ongoing developments. Ireland has configured its qualification data consistent with the ELM. A few countries acknowledged ELM's potential for comparing qualifications.

Countries also proposed various ideas for enhancing EU transparency tools. Most suggestions focused on the digitalisation and integration of existing EU

transparency tools and information. The need for connection and coherence between transparency initiatives and tools was stressed. Several countries pointed to the visibility of these tools for end-users and the need for more efficient implementation of existing tools. Many responses also highlighted the importance of networking, capacity building, and professional training both domestically and at the European level. Finally, the absence of a dedicated network for comparing and recognising VET qualifications was noted in some replies.

5.1.3. Common comparison and recognition practices

Across the board, countries highlighted national legislation, instructions, strategies, and various services as essential guidance for the comparison and recognition processes. They also reported having multiple national or regional competent authorities, information sources, and advisory bodies. Some countries employ 'expert panels' or similar bodies for the assessment and analysis of qualification content or to arrange exams and skills tests for applicants. These methods often resemble those used for validating non-formal and informal learning.

A central observation is that individual scrutiny and case-by-case analysis remain the most common approaches to comparing and recognising qualifications. This underscores the need for reliable, fit-for-purpose information accompanying each qualification. Many respondents noted the utility of the Certificate Supplement, though its availability is inconsistent, indicating room for better implementation. Only a few countries mentioned the recently adopted short descriptions of qualifications (EQF-Europass project group, 2024), which offer common principles for developing concise, learning-outcomes-based descriptions.

Exceptions to case-by-case analysis occur in the presence of multi- or bilateral agreements between countries on the recognition of qualifications. Recognition based on the coordination of minimum training conditions under the Professional Qualifications Directive (PQD) was mentioned as an exception. Additionally, experience with similar qualifications from the same country, institution, and time can guide the process, making individual scrutiny unnecessary. Automatic recognition, as suggested by the Council Recommendation (Council of the European Union, 2018), appears to be rare, with responses generally referring rather to a certain rigidity in comparison and recognition processes.

Typical criteria for comparison, as listed in responses, fall into four categories: context-related, institution-related, quality-related, and most importantly, criteria directly related to the qualification. The criteria used may vary depending on the purpose of comparison and recognition.

Context-related criteria include the legal basis for comparison and recognition, the qualification's place in the originating country's qualification system, and the authenticity of the document and qualification. Institution-related criteria often refer

to the status of the awarding institution in the country of origin. Quality-related criteria were mentioned less frequently; often, it suffices to prove quality if the qualification is part of the official qualification system of the country of origin, indicating a certain level of trust in others' formal qualification systems.

Qualification-related criteria were most common, including the status of the qualification in the country of origin (whether official and/or part of the NQF), the title of the qualification and/or profession, NQF/EQF level, formal rights post-study (e.g., access to further studies or the labour market), admission requirements, duration and credits, profile, subjects studied, curricular content, and learning outcomes. Although some criteria overlap, it is clear that assessment is often rigid and labour-intensive, as also noted in some responses.

The importance of qualification-specific learning outcomes was emphasised, with the quality of learning outcomes in curricula or programme descriptions deemed crucial for comparing and recognising qualifications. The focus was primarily on occupation-specific skills, with less attention to general and transversal skills. Challenges in comparing learning outcomes included differences in quality, granularity, and translation of learning outcomes and qualification titles.

Additional elements considered in comparison, although less frequently mentioned, included the allocation of weekly hours for each subject and school year, attendance records, grading systems, marks/grades of the applicant, study format (full-time, part-time), language proficiency, and the applicant's age.

The importance of using a national 'corresponding' qualification as a benchmark for comparison was emphasised in many responses. In some countries, comparing to a specific profession was a starting point, often combining both national qualification and profession benchmarks. In some instances, applicants with foreign qualifications were asked to identify a qualification and/or profession towards which the comparison should be made. Additional factors, such as an applicant's knowledge of local regulations or language skills, were sometimes considered in the comparison process.

The outcome of the comparison or recognition varies depending on factors like legislation or the purpose of comparison. In most cases decisions were either positive, conditional, or negative. The issued document might include comparability of levels between national and foreign qualifications, a detailed analysis of content, profile, and credits compared with the national qualification, comparability with a certain occupation in the receiving country, or the rights and legal effects of the decision. In some cases, a description of foreign qualification was given without comparison to any national qualification or profession. For conditional decisions made under the PQD, an adaptation period or aptitude test may be required. Similar requirements, possibly under different titles like work experience or skills tests, were observed in the recognition statements for non-regulated labour market. Some

countries also emphasised the need for national clarity and uniformity in the documents issued as a result of the comparison and recognition process.

The primary method of monitoring recognition processes is through the collection of statistics related to applications and decisions. This is particularly relevant for the implementation of the PDQ, as mandated by the Directive. Many countries also produce 'annual monitoring reports' focusing specifically on recognition activities. These reports often include data on the number of applicants, processing times, awarding countries, and the qualifications recognised. In some countries, these annual reports serve as tools for improving or standardising recognition processes both within the country and across different competent authorities.

User satisfaction surveys have been conducted by some countries to gauge customer experience. However, only a few, most notably Sweden and Norway, have undertaken surveys to assess the effect or impact of recognition decisions on applicants or employers. As a result, there is limited national-level evidence on the significance and actual impact of recognition for individuals.

Finally, artificial intelligence (AI) is currently viewed more as a potential tool than an active one in the realm of comparing and recognising qualifications. Most countries report that AI is not yet utilised for qualification comparison or data analysis, although some, like Poland, are piloting its use. Several countries identify significant potential in AI's data processing capabilities, which could help overcome linguistic and taxonomic barriers, verify the authenticity of documents or qualifications, compare learning outcomes more accurately, identify similarities, reduce labour costs, and expedite the comparison and recognition process.

Certain preconditions for the effective use of AI were noted in ReferNet responses. These include the need for accessible and complete national registers or educational documents, sufficient detail in describing qualifications, structured and comparable information, greater certainty regarding the usability and reliability of data, and generally more advanced digitalisation of information.

5.2. Lessons learned from the ReferNet survey

Responses to the ReferNet survey highlighted several challenges in recognising foreign VET qualifications, including political, trust-based, and technical issues, confirming some of our initial considerations. These challenges often stem from factors within host countries, such as political and economic considerations, particularly in specific employment sectors or in relation to migration issues. The level of services and support provided to stakeholders and individuals is another political factor, influenced by how resources are allocated and the priorities set by different countries. Several countries noted that the comparison and recognition of

VET qualifications is a resource-intensive task, ultimately shaped by political decisions regarding the structure and implementation of services and legislation.

Trust is a crucial component, particularly concerning the reliability and accessibility of information. This includes the extent to which decision-making and information sharing rely on societal trust. However, the transparency of decision-making processes and the ease with which applicants can access information about these processes were not prominently addressed in the ReferNet responses. Most responses focused on system-level issues rather than individual perspectives. The follow-up on recognition primarily revolves around statistics, with less emphasis on the impact of decisions on individuals or the broader education and labour markets.

Technical challenges are prevalent, particularly regarding the availability and organisation of information for both applicants and decision-makers, the provision of information in foreign languages, and the clarity and communication of processes and statements.

Despite some common approaches to comparing and recognising qualifications across countries, the overall landscape is complex, both at European and national levels. Commonalities include the division of approaches based on the purpose of recognition, whether for further study or work, with the latter divided into regulated and non-regulated sectors. Various European-level tools are employed for these different purposes. For instance, access to regulated labour market sectors is supported by the Professional Qualifications Directive, while the Lisbon Recognition Convention addresses access to higher education but is not consistently applied to VET qualifications. The use of transparency or digital tools varies depending on stakeholders and how and whether they have been implemented on national level.

For individuals, navigating the system to have foreign qualifications recognised can be challenging due to the numerous actors, dispersed decision-making powers, and varying levels of advice and guidance services. However, many countries are investing in improving information availability, including in foreign languages. Some countries have highlighted the need to simplify, expedite, and standardise the VET qualification comparison process.

On the micro level, the actual practice of comparison and recognition tends to be rigid. Often, equivalency between national and foreign VET qualifications is sought, rather than acknowledging and compensating for differences. There is potential to move beyond contextual factors like delivery and duration, and focus on the content and characteristics of the learning. The learning outcomes approach to comparing and recognising qualifications can be further developed and refined, depending on the overall progress in defining qualifications in terms of learning outcomes. The question of whether differences in qualifications are significant enough to hinder an applicant's success in further activities is not actively considered, leading to negative decisions or leaving applicants to navigate the

system alone for employment or further study opportunities. While most countries list elements of qualifications considered for comparison consistently, the articulation of these elements as actual criteria for comparison or recognition often remains unclear. Further study is needed to draw firm conclusions about recognition practices in Member States and among stakeholders.

Positively, the comparison and recognition of qualifications are not viewed as isolated activities but are part of a broader context involving policies like qualification development, transition to learning outcomes-based qualifications, quality assurance, transparency, cross-border cooperation, skills forecasting and gap analysis, labour market needs, immigration, and digitalisation. Many countries support European cooperation on comparison and recognition of qualifications and see the value in joint approaches and the development of best practices to aid the comparison process.

CHAPTER 6.
Discussion and conclusions

This final chapter brings together the key findings and insights from the preceding analysis, providing a comprehensive discussion and concluding remarks to the study. The discussion centres around key messages and takeaways from the analysis, including the role of existing transparency tools and initiatives, the methods national authorities and stakeholders use to compare and recognise VET qualifications, and the identification of relevant themes and concepts that could support the development of a practical framework for diverse recognition purposes in Europe. Afterwards, by focusing on the need for conceptual consistency, the need to learn from past experiences, and by highlighting several implications for policy and practices, this chapter aims to provide a nuanced understanding in the form of actionable insights of the challenges and opportunities in this area, and to inform future directions for policy and research.

6.1.   Key messages

This paper aimed to provide an overview of policies and tools employed by EU Member States to ensure the comparability and recognition of VET qualifications. It thus centred on exploring the following key questions: the role and enhancement opportunities of existing EU transparency tools, how national authorities and stakeholders compare and recognise VET qualifications, and the identification of relevant themes and concepts that could support the development of a practical framework for diverse recognition purposes in Europe.

In recent years, various transparency tools have become instrumental in facilitating the comparison and recognition of qualifications, shifting the focus from learning inputs to learning outcomes that highlight what individuals know and can do. However, despite their similar political objectives these tools often lack full coherence and do not form a fully integrated system. To enhance clarity and progress, new political initiatives should build upon previous ones. The EU's policies could benefit from greater consistency and building on past initiatives, as the current approach can lead to duplication of efforts and limit the potential impact of recognition and transparency tools.

The discussion around learning outcomes deserves special attention. Efforts are currently underway to better integrate learning outcomes into recognition processes. Exploring stronger links to learning outcomes could potentially simplify recognition, although the specifics of how and under which conditions this can be

achieved require further research. A balanced approach, incorporating short, learning-outcomes-based descriptions of qualifications (EQF-Europass project group, 2024), alongside with the consideration of input and contextual factors, may offer a practical way forward.

Tools like the EQF, Europass, ESCO and the ELM provide structured frameworks and documentation that help stakeholders understand and evaluate foreign qualifications. These tools aid in establishing mutual trust between different national systems, aiming to ensure that qualifications are described in a clear and comparable manner. However, despite their effectiveness on policy level, challenges remain in terms of visibility and practical application among end-users, such as employers and citizens, which limits their full potential. The tools operate at different levels, serve different purposes, and have somewhat conflicting conceptual departure points, which, due, to their varying degrees of complexity, scope, and user engagement, results in a lack of necessary visibility and practical application among end-users, such as employers and citizens, limiting their full potential.

 Bringing together these tools in a systematic way, including through conceptual alignment, remains a challenge for the EU, as it is essential to ensure their usefulness across all education and training sectors. While national and meso-level implementation can facilitate their integration in one education or qualification systems to some extent, more comprehensive solutions require the involvement of macro-level actors, such as the EU.

Opportunities for enhancing these tools lie primarily in further digitalisation and integration, leveraging advancements in technology such as artificial intelligence (AI) to streamline processes and make them more efficient and accessible. By harnessing the potential of digitalisation and AI, these tools can overcome existing barriers, including linguistic differences and taxonomic challenges, through the verification of document authenticity and improved data processing. However, to unlock the full potential of AI, a systematic approach and conceptual clarity are essential. For comparing qualifications, a consistent application and development of learning outcomes in curricula, standards and evaluation process is crucial.

Moreover, enhancing digital platforms like Europass with interoperable digital credentials can, once and if implemented, improve the clarity and comparability of qualifications. However, the practical implementation of these tools remains challenging and requires describing qualifications and learning outcomes in consistent and comparable ways. Common issues also include the rigidity of existing recognition practices, the siloed nature of educational sectors and recognition systems, and the need for clearer definitions of key concepts and criteria involved in the recognition process.

The governance landscape for recognising VET qualifications is characterised by considerable diversity across Europe. Each country employs its own set of

structures, involving various ministries, competent authorities, and stakeholders, to manage the recognition process. While common practices include differentiating recognition based on its purpose – whether for further study or entry into the labour market – challenges remain in aligning these processes and their outcomes across different national contexts. This diversity often leads to complexities for individuals navigating the system.

Building mutual trust between national qualification systems and for different types of qualifications is essential. While transparency tools have laid the groundwork for this trust, there is still room for enhancing it and introducing more flexibility in recognition processes, by accepting the existence of some differences between qualifications, understanding which differences are substantial, and searching for ways, if necessary for the individual, to compensate those differences, via for example validation of prior learning. Such improvements would better accommodate individual needs, add to lifelong learning possibilities and improve the use of VET qualifications in an ever-evolving labour market.

Broader policy initiatives and cooperative structures, like the Copenhagen process, Osnabrück Declaration and the Union of Skills strategy, play a vital role in sustaining progress in VET qualification recognition, especially when agreed measures consider and are based on earlier developments. These initiatives highlight the importance of collaboration, capacity building, and the development of best practices to support the comparison and recognition of qualifications. Looking to the future, efforts should focus on enhancing the visibility and accessibility of transparency tools, fostering greater collaboration among stakeholders, and addressing the conceptual and practical challenges that still hinder the recognition processes.

6.2. Need for conceptual consistency

As discussed earlier, our analysis of transparency tools revealed that these tools are not always conceptually consistent. Cedefop (2024b) has also previously highlighted that limited synergies among transparency tools are often linked to conceptual barriers. While acknowledging the importance of concepts like 'professional', 'vocational', or 'recognition', how 'reference point' and 'substantial difference' are understood is crucial for enhancing the recognition of foreign VET qualifications. Their consistent application across Europe would greatly benefit individuals. However, the development of transparency tools has often proceeded without sufficient conceptual discussion, with different initiatives advancing independently, not always based on earlier work and experience, and lacking the essential element of visibility.

When comparing qualifications, it is essential to understand how programmes align or differ, and to what extent differences can be reconciled. To facilitate this comparison, a reference point is utilised. Cedefop (2022, p. 30) defines a reference point as a 'conceptual fixed point for mapping learning outcomes included in national qualifications in order to analyse and compare them and identify commonalities and differences in their content and profile'. The significance of learning outcomes and their descriptions was also highlighted in the ReferNet survey, but there was no clear information on how and which elements of learning outcomes are being used when comparing and recognising qualifications. Nevertheless, the survey revealed that national qualifications or specific professions often serve as a reference point for recognising foreign qualifications. By incorporating learning outcomes into assessment frameworks, standards, and qualifications, it becomes feasible to introduce descriptions that support comparison and recognition.

Cedefop's (2022) handbook on learning outcomes can be useful for comparing qualifications, and even more importantly, for informing the design of qualifications from the outset. The handbook provides suggestions for articulating and sharing the depth and breadth of learning outcomes, which refer to the level of complexity and nuance required, and the range of knowledge, skills, and competences covered, respectively.

When learning outcomes serve as the backbone for comparison, the dimensions of learning outcomes being examined are of utmost importance, often dictated by the primary purpose of comparison. Certain elements of any qualification are crucial for all recognition purposes, and it is important to be able to see which learning outcomes are more important than others for the purpose of recognition. Discussion on benchmarks should also be expanded to include contextual factors of qualifications. In practice, this discussion also revolves around what is important to examine and where differences exist.

The concept of substantial difference arises from the legal framework for the recognition of qualifications (European Parliament & Council of the European Union, 2005; Convention on the Recognition of Qualifications concerning Higher Education in the European Region, 1997; UNESCO, 2019). Although this concept has predominantly been discussed in the context of higher education, as evidenced by the ReferNet survey, it is in practice also being applied to the recognition of VET qualifications.

The definition in the Global Recognition Convention (UNESCO, 2019) can be applicable to VET qualifications: 'only those differences between the foreign qualification and the national qualification that are so significant that they would most likely prevent the applicant from succeeding in the desired activity (further study or employment)'. This emphasises that minor differences, or in some cases even any differences, between qualifications should not automatically lead to denial of

recognition and should incorporate relevance into the comparison process. Defining substantial differences between qualifications using benchmarks and benefiting from clearly described learning outcomes would lead to greater transparency, justified decisions on recognition, and provide applicants with a clearer understanding of what additional knowledge or skills may be necessary. Over time and with experience, this approach could also phase out the equivalence-based approach, which is still widely in use.

6.3. Implications, actionable insights and future directions

At this stage, we should acknowledge the limitations of our study, before highlighting some policy implications and recommendations for future research. Our analysis of existing transparency tools, although comprehensive, has focused on initiatives relevant to comparing and recognising qualifications some of which may be considered 'outdated', since they were developed almost two to three decades ago, or might be seen as sector-specific in that they focus on higher education or limit themselves to regulated professions. Even with established initiatives, the main issue is the need for systematic implementation and support structures for further development, such as topical subsidiary texts to the LRC or proactive efforts to identify future development needs. As a result, our study might not fully capture the complexities of contemporary recognition processes in diverse national contexts. Furthermore, our survey, which relied on ReferNet members, may not be representative of all stakeholders involved in the recognition of VET qualifications. Notably, many survey respondents tended to discuss qualifications in general, often with a focus on higher education rather than VET, highlighting the complexity and nuance of the VET qualification landscape. These limitations highlight the need for ongoing research and analysis.

Nevertheless, this study has identified some key implications that could inform policy discussions on improving the comparability and recognition of VET qualifications. A crucial step towards achieving this goal is to establish a shared understanding of key concepts, like substantial difference and reference point among stakeholders. This could enable consistent communication and cooperation among national qualification systems, recognition authorities, and other stakeholders. Here, learning outcomes could provide a standardised language for describing qualifications. Recognition authorities and stakeholders should be provided with training and capacity-building opportunities to develop their understanding of learning outcomes and their application in recognition processes. While the challenge of limited human resources faced by some recognition authorities may hinder the use of learning outcomes, adopting the short learning

outcomes descriptions by qualification providers, leveraging the potential of digitalisation and AI, and increasing trust among systems (e.g., via cooperation), could help to overcome these challenges.

Specifically, enhancing the potential of digitalisation and AI on all levels of decision-making could involve developing digital infrastructure and capacity-building initiatives, such as online platforms and databases for recognition-related information, including, when possible, decisions on recognition and providing funding and support to enable the effective use of digital tools in recognition processes. By doing so, recognition authorities and stakeholders can streamline recognition processes, improve their efficiency and accuracy, and ultimately end up in flexible and quicker recognition of VET qualifications.

Moreover, fostering mutual trust and cooperation among national qualification systems is essential for promoting the recognition of VET qualifications. This could be achieved by establishing a network of recognition authorities to share good practice and develop common standards and guidelines for recognition. Regular meetings and workshops should be organised to discuss different approaches to comparison, thereby facilitating cooperation and dialogue among national authorities and other stakeholders. Ultimately, these discussions should aim to ensure the equal treatment of applicants across different contexts. Finally, well-coordinated quality assurance standards and processes would ensure transparency and trust in qualifications and credentials from different types of providers or emerging outside formal education and training systems.

To synthesise the study's key findings and align them with the challenges and opportunities for future development, we have created Table 1. This table provides a concise overview of actionable insights that can inform policymakers and researchers in their efforts to improve the comparison and recognition of VET qualifications.

Table 1. **Actionable insights for enhancing the comparison and recognition of VET qualifications**

Themes	Challenges	Priority solutions
1. Availability of and access to information on qualifications, learning outcomes, and recognition procedures for individuals and other stakeholders, aiming to create a comprehensive roadmap for comparison and recognition	- Information is dispersed ('silo logic') and not always up to date or digitally available. - Lack of comprehensive entry points for information on qualifications, learning outcomes and recognition at national and European levels. - Information is complex, using terminology not easily understood by end-users. - Information is inflexible, not easily adaptable to individual's specific needs before, during and after the comparison and recognition process. - Language barriers.	- Develop digital and comprehensive entry point for information on qualifications and credentials (all levels and types) to give individuals and other stakeholders access to relevant information on level, learning outcomes and input. - Use standardised, short descriptions to define learning outcomes. - Streamline and simplify recognition processes and provide clear information on them. - After recognition, provide information for the individual concerning rights and next steps if qualification has not been fully recognised. - Information available at least in English (on top of national languages).
2. Processing information on comparison and recognition, including (a) conceptual clarity, and (b) supportive digital/AI solutions allowing to increase capacity for comparing and recognising qualifications	- EU transparency tools and legal texts, including soft law, often employ similar terms to describe different concepts. Concepts are inconsistently applied. The development of new initiatives often overlooks accumulated experience. - Lack of knowledge and understanding of transparency tools among stakeholders and individuals. - AI/digital tools often implemented without careful consideration of the characteristics of learning and qualifications. - Conceptual clarification and implementation of AI language models need to go hand in hand end evolve based on accumulated experience. - AI/digital solutions are applied inconsistently – developing fast in some areas and under-used in others, failing to improve capacity and quality for all individuals.	- Initiate (immediate) cooperation between Member States on the use of AI language models for comparison and recognition of qualifications, building on the conceptual specifics of qualifications, competences and learning outcomes. - Critical look on existing digital transparency tools from the perspective of individual learner and employee needs. Prioritisation and/or alignment of digital tools. - Intensify cooperation between EU Member States to develop more comprehensive and consistent tools and practices.

Themes	Challenges	Priority solutions
3. Diverse recognition practices	- Inflexibility in assessing foreign VET qualifications. - Recognition practises sometimes implicitly used for 'gatekeeping' and protecting sector interests (conflicting with learners' interests). - Use of too many criteria. - Learning outcomes are not fully understood by decision-makers. - Presentation of learning outcomes not conducive to comparison and recognition. - Multitude of national approaches and actors can lead to difficulties in coordinating the work, confusing individuals.	- Better aligned and transparent approaches for comparison and recognition, balancing the need for gatekeeping with learners' interests. - European co-operation and network for exchanging information and agreeing on key criteria for recognition. - Improve common understanding of the critical concept of substantial difference.
4. Addressing mutual trust through political cooperation and framework building, including addressing silo logic and jurisdictional disputes	- Longstanding practice of focusing on individual sectors rather than considering the qualification system as a whole (at EU and national levels). - Insufficient information and transparency in quality assurance procedures in Member States.	- Intensify efforts at EU and national levels to improve trust across qualifications systems, addressing all levels and types of qualifications and credentials. - When updating existing initiatives or developing new ones, considering qualifications systems holistically, with lifelong and lifewide learning as the main consideration.
5. Future-proofing via systematic learning from Member States, existing tools, available research and piloting, including Erasmus+	- Currently there is no coherent mechanism providing information about recognition for different purposes in Member States. - No systematic information available on recognition decisions and their underlying rationale at national or stakeholder levels. - Very limited follow-up on the impact of recognition for individuals. - Lack of established co-operation to support mutual learning and agree on good practice for comparing and recognising VET qualifications.	- Organising mutual learning to identify good practices in the recognition of foreign VET qualifications. - Analysis of benefits of bilateral or regional recognition agreements and associated qualifications as well as reasons contributing to their success. - Systematically gather and analyse the outcomes of research, pilot projects (for example Erasmus+) and evaluations ('looking back to look ahead').

Source: Authors.

To this end, further data would be needed on several issues. To deepen our understanding on the stakeholders involved and the methodological approaches adopted for the recognition of VET qualifications, an in-depth analysis of the situation in Member States would be necessary. This could involve identifying the specific challenges faced by stakeholders in different countries, as well as shedding light on the possibilities to streamline comparison and recognition criteria for all purposes of recognition, including unregulated professions, which are not specifically addressed

by any European approach. The ReferNet survey has highlighted the need for a practically oriented framework that considers the diversity of national contexts and qualification systems. Such a framework could include detailed discussion on recognition criteria, also in relation to substantial differences and reference points, provide guidelines and good practice, accompanied by tools and resources that can be used by different stakeholders to facilitate the recognition of VET qualifications.

There is also a need for more research on the impact of recognition processes on individuals and the labour market, as well as the implications of the narrowing gap between recognition of qualifications and validation of non-formal and informal learning. Finally, the potential of artificial intelligence in recognition is an area that warrants further investigation, as it could have significant implications for the efficiency and effectiveness of recognition processes.

Abbreviations

AI	Artificial Intelligence
BRAVO	Bridging a European Network for Recognition of Vocational Qualifications
ELM	European Learning Model
ENIC	European Network of Information Centres
EQF	European Qualifications Framework
ESCO	European Skills, Competences, Qualifications and Occupations
GRC	UNESCO Global Recognition Convention
LRC	Lisbon Recognition Convention/Convention on the Recognition of Qualifications concerning Higher Education in the European Region
NARIC	National Academic Recognition Information Centres in the European Union
NQF	National Qualifications Framework
PQD	Professional Qualifications Directive/Directive 2005/36/EC of the European Parliament and the of the Council on the recognition of professional qualifications
ReferNet	European network of expertise on VET
SWOT	Strengths, Weaknesses, Opportunities, Threats
VET	Vocational education and training

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POLICIES AND TOOLS FOR COMPARING AND RECOGNISING VET QUALIFICATIONS IN EUROPE
An overview

This paper provides an overview of the policies and tools employed by EU Member States to ensure the comparability and recognition of VET qualifications. It explores the role of existing EU transparency tools, the methods used by national authorities and stakeholders to compare and recognise VET qualifications, and identifies relevant themes and concepts that could support the development of a practically oriented framework for diverse recognition purposes in Europe.

The findings highlight the need for conceptual consistency, the importance of building mutual trust between national qualification systems and using learning outcomes in recognition processes, as well as the potential of digitalisation and artificial intelligence to enhance the efficiency and effectiveness of comparison and recognition processes. The paper concludes by outlining implications and actionable insights, and identifies areas for future research, emphasising the need for sustained collaboration to foster transparent and flexible recognition practices that enhance mobility and skills utilisation across the EU.

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