



Ordem dos Médicos Dentistas( OMD)  
Oral Physicians Order  
Portuguese Dental Association

**Statement to the CED General Assembly** on the Press Release on the Implementation of the Professional Qualifications Directive (CED-DOC-2018-029-E)-  
**“CED and ADEE Call for Compliance with PQD” - Analysis over the Professional Qualification Directive systems – For Compliance with PQD.**

First of all, we would like to stress the importance of seeing a matter of transversal regulation debated among all the members that integrate the CED in General Assembly. As a body of representation of the profession, a lobby structure of direct consultation of the European Commission, and the activity that it carries out in terms of institutional representation of all the agents represented in this Council, CED has a particular public responsibility for its members and the profession in general.

1

In this spirit we congratulate the board of directors for the inclusion of this topic on the agenda by request of the Ordem dos Médicos Dentistas.

In fact, this should be a common procedure where matters are one of regulation or intervention by one of the parties, in this case a CED member, prior to the dissemination of any kind of actions that may have a direct impact on one of those involved. As it was indeed the case.

It is well known that the role functions of a university, a competent authority, a union, a professional association or a consultation platform, are different and must be understood and respected.



**In Portugal, the Constitution of the Portuguese Republic explicitly assigns, beyond any doubt, an unequivocal independence and autonomy of the Universities, and it is not legitimate for the Portuguese Competent Authority, the OMD, Ordem dos Médicos Dentistas, in the matter of professional access to have a direct intervention in the Portuguese Higher Education System, or in academic and curricular subjects.** For this, there are General Directorates of the direct administration of the State.

Dear CED Assembly,

It is our understanding that the Statement "CED and ADEE Call for Compliance with PQD", which was carried out and dissuaded by the Board of the CED, scheduled for the present general meeting of the CED, at our request, did not respect the aforementioned recitals.

2

---

In other words, all the parties involved should always be asked for the clarification necessary **before the public disclosure of messages that may result from a lack of knowledge of the reality.**

**Unfortunately, neither the so mentioned “private portuguese faculties” or the Ordem dos Médicos Dentistas”, were asked before this happened.**

**The Order is a CED member for many years now and we understand that a precedent has been set forth. From now on, similar procedures will be enforced with respect to other situations.**

**All CED representatives of the profession, from several countries should be treated equally.**



In what concerns the specific compliance with the Professional Qualification Directive (PQD), **it is very important to stress that Portuguese Higher Education System fulfils the European Association of Quality Assurance in Higher Education (ENQA) requirements, by action of the Agency for Assessment and Accreditation of Higher Education (A3ES) as stated by the report from March 2014.**

**Precisely following the practice described above, that of first asking and then acting accordingly, if and when justifiable, the Order asked all Portuguese private higher education institutions what they have to say about the Press made public.**

Specifically, the answers point to what could not fail to be considered and that is hereby exposed:

3

“Under the legal conditions defined by the Portuguese law (Decreto-Lei nº 74/2006, of the 24th March, with the last amendment by the Decreto-Lei nº 63/2016, of the 13th September) and by the University’s academic rules.

The study plan completed by all the graduated students in Dental Medicine fully complies with the European Directive 2005/36 / EC as regards the duration of 300 ECTS (1 ECTS= 25 hours) with a minimum of 5,000 teaching hours of theoretical, practical and clinical training and of personal study.

All the core syllabus teaching units required by the European Directive, listed in Annex V.3 - 5.3.1, are present in the study plan and the students

Their application was accepted within the legal framework provided for in Article 45 (1) (e) of Decree-law nº. 74/2006 of 24 March, as amended by the Decree-law nº. 107/2008 of June 25; by the Decree-law nº. 115/2013 of 7 August; and by the Decree-law nº. 63/2016, of 13 September, in which letter e) of Article 45 passes to



letter f) with the same content. 10. That Article 45 authorizes Portuguese public and private institutions of higher education, such as ours, to award ECTS (European credits) to various types of training followed by applicants for admission and enrollment in a Portuguese cycle of studies, prior to their application. “

The OMD believes that an institution such as the CED should put itself above any particular situation and, instead, focus on the concrete topics of regulation whose treatment should benefit patients and professionals.

That being said, the OMD hereby stresses the following:

I - PQD comprises two fundamental systems in terms of mobility.

One that highly enables mobility is the automatic recognition of qualifications and is based on two key factors:

- Basic training
- and
- Program contents.

II – On the other hand, PQD in itself also allows compensation measures in situations where competent authorities have substantiated doubts concerning the applying migrant’s qualifications. This situation in no way favours mobility and creates serious problems not only for the applying migrant but also between competent authorities themselves. One of the reasons being the fact that the compensation measures are far from being clear.

III- The automatic recognition system is totally distorted in what concerns the two factors mentioned above (training and contents), since it is captive of Annex V:



Why? Because it is annex V that definitively dictates which diplomas and Portuguese “cartas de curso” oblige all competent authorities to award the professional title of “Dentist”.

IV – The competent authorities have no means of investigating, verifying or questioning the applying migrants background, when he or she detains one of the Diplomas indicated in PQD, and that allowed the said migrant to obtain the diploma.

V- It is recognized that **competent authorities have to comply with the Directive and therefore cannot refuse applying migrants** that present the diplomas mentioned in Annex V, or rather, not awarding professional titles.

VI – As such it is therefore recommended that:

**a) - All Member States should instil the importance of minimum training adopted by the EU, in the respective higher education systems.**

**b) - All Member States should foment the need to reinforce the automatic recognition system thus consolidating the trust factor.**

**c) - This will only be possible if two PQD key factors are simultaneously reinforced because they are the pillars for the said automatic recognition system:**

- 1) 5 year/5000 hours of training, be it full-time or the equivalent part-time and
- 2) The effective contemplation of the programme contents established by PQD.

**We hereby request that the responses received from the private portuguese faculties may in good faith be included or become visible along with the Common Position between CED and ADEE, already made public on CED website.**

Best regards,

Ordem dos Médicos Dentistas

CED, General Meeting, Tallin, May,