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#### RESEARCH ARTICLE



Relevance of qualifications and work experience in the recruiting of foreign-trained immigrants – comparative insights from the Health and ICT Sectors in Germany and Canada

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#### Abstract

Germany and Canada differ significantly regarding their migration policy as well as the structures of the national labour markets and their educational systems. This paper aims to analyse how these differences affect the labour market outcomes of immigrants and the usability of foreign qualifications and work experiences by using the health and ICT sectors as example. The comparison focuses on the question how qualifications and work experience serve as signals and are screened for in the recruiting process of enterprises. The results show clear differences as well as several commonalities between the two compared countries.

# INTRODUCTION

In Canada, several studies document the deterioration of qualified immigrants' labour market outcomes. They face problems such as comparatively lower income, higher unemployment and devaluation of their qualifications, skills and work experience as well as economic marginalization (e.g. Gilmore, 2009; Green & Worswick, 2012; Li, 2008; Li & Sweetman, 2013; Owen & Lowe, 2008; Picot, 2004; Picot & Sweetman, 2012; Reitz, 2005; Thompson & Worswick, 2004). The situation in Germany is comparable, because there huge disparities persist in labour market experiences and outcomes between German and foreign employees comprising first, second and third generation immigrants (Mergener, 2017 and e.g. Battisti & Felbermayr, 2015; Brück-Klingberg *et al.*, 2007; Höhne & Schulze Buschoff, 2015; Seibert & Solga, 2005). So far, there have been few studies conducted

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which investigate either measures that employers undertake for the screening relating to foreign qualifications, skills and work experience or the type of information and rationales upon which they base their hiring decisions. Furthermore, no systematic insights are available about how the individual applicants participate in this decision processes and which role the individuals have as active providers of signals such as credentials.

The aim of this paper is to present comparative insights about how well immigrants can use their foreign qualifications and work experience in the labour markets in Germany and Canada. Canada has a long tradition in accepting and integrating migrants into the domestic labour market and society. Furthermore, it has the most elaborate and longest-standing skilled labour migration system of all OECD countries (OECD, 2019). Overall, Canada allows migration through three different streams: economic, family and humanitarian class. This paper focuses on the economic class where potential immigrants to Canada are evaluated regarding the human capital they bring to the country and the result of this evaluation process determines the migration decision. In the context of temporary employment in Canada, the Temporary Foreign Worker Program is of central importance. Its purpose is to meet serious and acute labour market needs (Guo & Shan, 2013). Although the Federal Skilled Worker Program serves the continuous recruitment of qualified workers from abroad, the Temporary Foreign Worker Programs of the provinces focus on attracting foreign workers for current concrete labour market needs. Thus, the two programs complement each other and serve to promote the growth of Canada's economy and population. On the contrary, Germany is facing an increasing influx of migrants especially in the recent past without having a long or broad experience in integrating migrants in the domestic labour market, while the country also just recently developed a new law on migration which is supposed to facilitate the migration and labour market integration for migrants from countries outside of the European Union. In Germany, the Recognition Act aims to address the existing shortage of skilled workers by promoting qualified immigration from abroad. In addition, the law aims to improve the social integration and access to the labour market of people with foreign qualifications who are already living in Germany. The Recognition Act encompasses all professions regulated by federal law and creates a general right to conduct a recognition procedure, which makes it possible to assess the equivalence of a foreign qualification to a comparable German qualification for all professions. The Recognition Act and the regulations for obtaining a residence permit are closely linked in Germany. This situation is the central motivation why these two countries were chosen for a comparison, as it represents from a country systemic perspective a significantly different approach, with Canada characterized by a liberal labour market whereas Germany is characterized by an occupationally structured labour market. The key argument of this paper is that in addition to individual factors, also systemic contextual factors as well as the sector-specific circumstances and requirements, which are different in health and ICT, highly affect the recruiting process. Important individual factors include formal qualifications, work experience, social capital and language skills (e.g. Li, 2008) where considerable systemic context factors include national migration and recognition policy as well as the structures of the national labour market and the educational system (Guo, 2013; Hawthorne, 2007). This paper clarifies how the use of signalling and screening measures differs between the two compared countries in two exemplary sectors and which reasons might explain these differences. In doing so, the results of this paper help to deeper understand the reasons why integration is problematic or partly fails by identifying country as well as sector-related factors and effects that prevent the immigrants from a better integration and on a larger scale the host country's economy and society from greater possible benefits of migration.

The central assumption regarding the two different sectors chosen for the analyses is that qualifications are more relevant and determine labour market access and success more strongly, within the health sector than within the ICT sector. Furthermore, these two sectors were selected because there is a fairly high labour market demand for qualified employees in both analysed countries. In this regard, labour market data (Bundesministerium für Gesundheit [BMG], 2018; Institut der deutschen Wirtschaft [IW], 2018a, 2018b) proof this high demand in both sectors in Germany, which may influence the scope of action of the employers. Analyses of labour market shortages by the German Federal Employment Office show acute shortages in the fields of technical, health and care occupations as well as building occupations (Bundesagentur für Arbeit [BA], 2018). There is a persisting shortage in the areas of nursing and geriatric care (Czepek *et al.*, 2015). In regional terms, the south, north and centre of Germany are particularly affected, which is also confirmed by qualification and occupational field projections of future applicant scenarios (Zika *et al.*, 2015).

The same is true for Canada, where there is also a high demand for skilled workers in the ICTsector due to the need of companies to continuously upgrade their ICT systems (COPS, 2017a). In the health sector in Canada, in addition to strong labour market demand, labour supply has been constrained by limited training seats for health professionals and difficult working conditions, leading to significant labour shortages in the industry as suggested by very low unemployment rates for health occupations (COPS, 2017b). Hence, in Canada, nurses are also still considered as a high demand occupation whereas the demand is significantly higher in Germany.

The reported results derive from twelve case studies, six in German as well as six in Canadian ICT companies and hospitals, which included interviewing foreign-trained employees, recruiters and HR-representatives. Their subjective perspectives have been largely overlooked in former research studies.

Previous research already indicated that country-specific aspects (Wheelahan & Moodie, 2016) as well as sectoral specifics (Saar *et al.*, 2014) influence the concrete roles of signalling and screening in the recruiting process. The paper aims to answer the two following research questions: How does the aspect that the applicants come from abroad effect the recruiting process focusing on signalling and screening? Which differences and similarities occur between Germany and Canada and which effects are related to the two analysed sectors?

Overall, this study promotes the dialogue between Germany and Canada regarding immigration policy and the recognition of foreign qualifications and skills. Furthermore, the results help the stakeholders involved, especially the employers, to reflect the effectiveness of their own measures and procedures in place and to improve their internal processes and measures.

# RECOGNITION OF FOREIGN QUALIFICATIONS IN GERMANY AND CANADA

The German laws on recognition of foreign qualifications – the so called Recognition Act – aim to address skills shortages by fostering qualified migration from abroad, as well as by improving societal integration and access to the labour market of people with foreign acquired qualifications who already live in Germany. The German laws on recognition of foreign qualifications comprises regulated as well as unregulated occupations and based on these laws people have the right to have their foreign qualifications evaluated to determine its equivalence to a comparable German qualification (Annen & Eberhardt, 2015, p. 2438; BMBF, 2014, p. 22). The aim of this process is to increase the acceptance of foreign qualifications in the labour market through formal recognition of equivalence and facilitate the integration of applicants in competing with job applicants with a domestic qualification (BMBF, 2014, p. 33).In Germany, migration policy, labour market policy and the laws on recognition are not linked to each other. To enter the labour market, especially in non-regulated occupations, a formal recognition is not a prerequisite for migration (Annen & Eberhardt, 2015, p. 2439; BMBF, 2014, p. 21).

In Canada, in the recent past, the process of the estimation and recognition of foreign qualifications was discussed politically especially in the context of national coordination through the 'Pan-Canadian

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Framework for the Assessment and Recognition of Foreign Qualifications', which led to the determination of normative criteria relevant for all stakeholders (Annen & Eberhardt, 2015; Forum of Labour Market Ministers [FLMM], 2009). The Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications describes the ideal steps and processes that provincial governments aspire to build in order to address the current gaps to successful immigrant labour market integration (Annen & Eberhardt, 2015, p. 2440; FLMM, 2009, p. 5).

One significant difference between Canada and Germany is that in Germany the recognition process for every occupation (regulated and unregulated) is covered by the Recognition Act and the respective legal regulations, whereas in Canada, the above-described framework basically consists of suggested good practice standards without any legal handle. This makes it less powerful than the German recognition laws. However, the Canadian immigration law includes the consideration of foreign credentials, which are formally assessed within the migration process. The reason for this is that the Canadian government wants to encourage skilled labour immigration to the country. The Pan-Canadian Framework for the Assessment and Recognition of Foreign Qualifications tries to facilitate the transparency and fairness of the recognition process for immigrants.

Both countries differ regarding their educational system and the structures of their labour markets. Although in Germany, the VET system has a great importance, the Canadian educational system is characterized by the high relevance of higher education. Especially, in the health sector in Canada, a bachelor degree is required whereas in Germany a nurse goes through a vocational training. However, Germany and Canada have quite similar framework conditions in both analysed sectors regarding the recognition process. This paper aims to investigate to which extent the labour market access requirements vary between the both compared countries in two selected sectors.

In health, nurses must prove sufficient formal qualifications as well as work experience to be licensed by the legally responsible body, for example, the College of Nurses of Ontario (CNO) or the regional district council in Germany. Furthermore, in Canada, nurses need to pass a compulsory standardized exam after their graduation which is required to be registered. Regarding the required qualifications a significant difference between both countries is that in Germany nursing is a VET qualification, whereas in Canada there are two categories of nurses – Registered Nurses (RNs) who are trained by the university sector and require a bachelor degree, and Licensed Practical Nurses (LPN) who are trained by the college sector and require a diploma. Within the case studies, only Canadian RNs were interviewed. In Germany, this differentiation between levels of nursing does not exist. In the ICT sectors in both countries, there are no labour market regulations determining any necessary qualifications or work experience, which leaves the whole access decisions with the employers. There are no general qualifications required in the ICT sector and it completely depends on the position and the enterprise which qualifications are perceived as being necessary to perform the job. Although in Germany, the recognition process is limited to a maximum duration of 4 months by law (in the case where all documents are provided by the applicant and no detailed qualification analysis is necessary) there is no comparable legal standard in Canada.

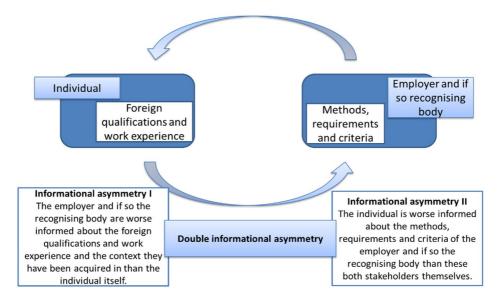
# THEORETICAL BACKGROUND AND RESEARCH QUESTIONS

Theoretically, an information asymmetry occurs within the recognition of foreign qualifications and work experience and the recruiting of foreign-trained employees. Immigrants are better informed regarding the educational system and the labour market of their country of origin than the potential employers in the host country are. To overcome this information asymmetry immigrants face, the challenge of communicating and marketing their foreign qualifications and work experience in a way that domestic employers can understand and value. A second information asymmetry exists at the expense of the foreign applicants regarding the methods and criteria of recruiting and recognition used by the potential employers and recognising bodies in the host country (Annen, 2012, p. 245). Hence, a double information asymmetry occurs in recruiting of foreign-trained applicants. Besides the above analytical framework, which is strongly related towards the involved stakeholders this paper also tries to take a systemic perspective into account. This is based on the assumption that regulatory and institutional structures of national and sectoral labour markets as well as of the educational systems affect access options and pose possible obstacles for immigrants (cf. regarding the influence of the higher educational system Leuze, 2011) (see Figure 1).

Spence's signalling theory aims to explain the reduction of information asymmetries on markets by using signals (Spence, 1973, p. 355ff). Put simply, the better-informed party acts first to give the less informed stakeholder a signal indicating a not directly observable characteristic. Spence transfers these theoretical reflections to the labour market, where employers are not sufficiently informed about the skills of their job applicants (Spence, 1973, p. 356ff). Because employers cannot direct observe the extent the applicants actually meet their requirements, they use available information to build assumptions. For employers using signals may be cost efficient, especially when they have large numbers of applicants and would need to invest an extensive amount of time and resources to screen all of them (Di Pietro, 2017).

Besides signalling, Stiglitz (1975) characterizes screening as a mechanism with which markets react towards imperfect information about the quality of individuals. Employers act the same way when they search for appropriate applicants (Arrow, 1973). Although in the signalling model, the better-informed stakeholder acts first, within the screening model the less-informed stakeholder does.

Both stakeholders (employers and employees) can use several measures to deal with the described information asymmetries within the theoretical models of signalling and screening. Table 1 illustrates the different potential measures. Within the following, the focus of the analyses will be on signalling activities of the foreign applicants as well as on the screening activities of the employers, because these activities happen within the recruiting process itself whereas both others (signalling of the employer and screening of the applicants) occur before the recruiting process.



**FIGURE 1** Double information asymmetry within the recruiting process of foreign-trained employees. [Colour figure can be viewed at wileyonlinelibrary.com]

	Individual foreign applicant	Employer (or recognising body)
Signalling	Provision of credentials, work references or other evidence of occupational experience	Transparent communication of their recruiting or recognition process (methods, requirements, standards, criteria etc.); institutional accreditation; reputation building measures
Screening	Use of advisory and counselling services; consultation of employment agencies	Interviews; tests; reference checking

TABLE 1 Potential signalling and screening measures

### **RESEARCH METHODS, DESIGN AND INTERVIEWEES**

In both countries, following a maximum variation sampling (Patton, 2001) the case studies were conducted in the ICT and health sectors, which vary in their degree of regulation and their occupational requirements in general. Prior to the presented case study oriented project, an explorative study with representatives from regulatory bodies from different sectors was conducted (Annen & Eberhardt, 2015). The results lead to the selection of the health and ICT sector, because they vary significantly regarding systemic context factors. Due to the qualitative approach, concrete occupations or roles were chosen for the sector-specific analyses. The interviews were conducted with nurses in the health sector and with project managers or software engineers in the ICT sector. In both analysed and compared countries, both sectors have a fairly high labour market demand for qualified employees - also or especially for the chosen occupations. In both countries, intensity sampling (Patton, 2001) is followed in the regional selection with regard to the health care industry. Accordingly, Ontario in Canada and North Rhine-Westphalia in Germany were selected, because both have the largest share of population within the country and the highest absolute share of immigrants. The measures of signalling and screening are compared in different contexts (sector as well as labour market and education system) of the recruiting process and from the perspective of both stakeholders in this process (employees and employers).

In order to gain multi-perspective results, in each country, 13 interviews with employees and 12 interviews with recruiters were conducted, which leads to an overall number of 50 semi-structured interviews in both countries. The companies were selected based on their progressive practices in recruiting employees with foreign credentials. The following Table 2 gives an overview of the characteristics of the interviewees. They were selected by the companies themselves after agreeing to participate in the study (criteria for recruiters: broad experience with hiring foreign-trained employees; criteria for employees: qualification on a bachelor level and variation in countries of origin). The contact person in each company was asked to consider the following criteria when selecting the interviewed employees: in Germany or Canada since at least 2 years, having acquired most of their formal qualifications abroad, German or English are not their mother language. Regarding the recruiters or HR representatives, the companies were largely free as the only criteria here was that the interviewees should have experience with hiring employees with foreign qualifications and work experience abroad.

Within the interviews, both groups were asked various questions regarding the following topics: recruiting process, labour market integration, as well as the recognition of foreign qualifications and work experience.

All interviews were audio recorded and transcribed verbatim. The textual data were coded with MAXQDA qualitative data analysis software. The data were segmented according to meaning units and thematically coded. The codes partly reflect the theoretical framework on which the project is



	Germany	Canada
Employees	Gender: ICT sector: seven interviewees (five male and two female); Health sector: six interviewees (four female and two male)	Gender: ICT sector: six interviewees (five male and one female); Health sector: seven interviewees (six female and one male)
	Education: interviewees mainly received the entirety of their education in their country of origin; twoo interviewees acquired parts of their education in Germany	Education: interviewees mainly received the entirety of their original education (not including necessary bridging and/or further educational measures required in Canada) in their country of origin
	Status: one interviewee is a refugee, all others are work migrants or came because of private reasons	Status: one interviewee is a refugee, all others are work migrants or came because of private reasons
	Stay in Germany: between 2 and 17 years	Stay in Canada: between 2 and 14 years
	Language Skills: all interviewees speak English as a second or third language	Language Skills: one interviewee speaks English as mother language and all others as a second or third language
	Countries of origin: Spain, Ukraine, Yemen, India, Iran, Serbia, Croatia, Cameron, Canada, United States	Countries of origin: Scotland, Germany, Hungary, Ukraine, Brazil, India, China. South Korea, Philippines, Ruanda
	Years of work experience: between 0 and 16 in their country of origin or other foreign countries	Years of work experience: between 0 and 24 in their country of origin or other foreign countries
Recruiters and HR representatives	Origin: mainly Germany with only one exception (German not native language)	Origin: seven from Canada and five from other countries
	13 interviewees (6 female and 7 male)	12 interviewees (3 female and 9 male)

TABLE 2 Characteristics of the interviewees

based. Within the data analysis, a mix of deductive and inductive coding was used. For the signalling and screening aspects, the above theoretical framework built the point of reference. For the occurrence of further sector and country-specific effects on the recruiting and the integration process, an inductive coding mode was used. All interviews were coded by only one coder, who also conducted all interviews personally.

# COMPARISON OF THE RECRUITING PROCESS OF IMMIGRANTS IN GERMANY AND CANADA

One can state that research in comparative education is highly differentiated and comprises a broad variety of investigation methods (Epstein, 1992). Comparative education in VET is an own academic discipline' (Lauterbach & Mitter, 1998; Pilz, 2007) and a special type of comparative education. To meet the standards in comparative research, it is necessary to define a set of criteria. These criteria form the concrete variables of the comparison, which means the 'tertium comparationis' (Lauterbach & Mitter, 1998). The research object to be compared in this article is the recruiting process of immigrants in Germany and Canada. Referring to the theoretical background the appearance and the measures of signalling and screening are compared. To structure this comparison, first the context of the

recruiting process and second the stakeholders in this process are differentiated. The context as first dimension of the comparison is formed by the sector as well as the reference to the educational system or the labour market. These criteria are chosen as the institutional context is assumed to significantly determine the recruiting practices in place. Besides, the recruiting process aims to fulfil the matching between the applicants holding certain qualifications and work experience and the employers' open positions. Accordingly, both stakeholders in the recruiting process and their perspectives are used as second dimension of the comparison between both countries. This structure leads to the following matrix (Table 3).

The results presented derive from qualitative interviews, which limits the opportunities for a broad generalization. However, the following findings give an overview of frequently occurring rationales and decision criteria of employers and employees within the recruiting process and try to explain the problematic labour market situation and integration of migrants identified by various quantitative studies before (see Introduction). All interviewees were asked how they perceive the importance of formal qualifications and work experience at their organization and in their sector in general. The following results focus on the analysis of these particular questions, because formal qualifications and work experience of signalling or objects of screening.

# **COMPARATIVE INSIGHTS FROM THE ICT SECTOR**

Although globalization and a comparable high demand for skilled workers characterize the ICT sector in both countries, the relevance of qualifications and work experience differs significantly. The following sections report the detailed results for each country.

#### Germany

All interviewed employees regard a formal qualification as a requirement to be considered as an appropriate candidate. At the same time, work experience in specialized and in demand fields is perceived as very important to differentiate oneself from other candidates and to be the crucial reason for getting hired for certain positions. Furthermore, the foreign-trained employees evaluate work experience as being more important for senior or leading positions than for an entry position. In this regard, foreign work experience is estimated as being comparable to German work experience, as all interviewees described the ICT field as globalized and the tasks performed do not differ significantly between countries. This is despite an acknowledgment that there may be differences regarding the technological standards as well as the work cultures.

The recruiters stated that formal qualifications are an important aspect when hiring candidates. However, they explain that the importance of this criterion to be less because of the academic background itself, but something that they clearly perceive as a signal for having learned to approach

	Stakeholder/Perspective context	Employer	Employee
ICT	Educational system	Screening of qualifications	Signalling of qualifications
	Labour Market	Screening of work experience	Signalling of work experience
Health	Educational system	Screening of qualifications	Signalling of qualifications
	Labour Market	Screening of work experience	Signalling of work experience

TABLE 3 Structure and criteria of the comparison

professional problems in an analytical way. They admit that proving this sector-specific way of thinking can also be accomplished by having relevant work experience instead. In addition, a degree is regarded as proof of having cleared a hurdle. This means that the area in which this degree was attained can be outside of ICT (depending on the position, the technical requirements, as well as the age of the applicant) due to the relatively newness of the sector. Furthermore, some recruiters anticipate that the importance of formal qualifications will decrease further in the future, because of the dynamics of the sector and the short half time of knowledge in ICT.

The ICT recruiters regard work experience as a crucial aspect of employability, one that the clients of the ICT companies often require explained by the expectation that only specific work experience allows employees to perform certain jobs successfully. This is reported as something the companies have to consider when hiring new employees and when staffing projects. Still, all recruiters state that because of the high demand in the sector, companies also hire new graduates for entry positions and give them the opportunity to gain work experience. In general, the recruiters explain the openness and liberalness of the companies regarding formal qualifications as well as work experience, by the high labour demand in the ICT sector. For example, one recruiter explained:

If you are now applying at (company name), then 80% of hiring managers are looking for an academic degree. [...]If you have cleared this hurdle, formalities are no longer important, then it is more about what you have done, on which topics you have worked and which experiences you have made. (interviewee 2)

The recruiters also refer to the specifics of the ICT sector as decisive for the limited relevance of formal qualifications in this sector.

### Canada

In contrast to Germany, the Canadian ICT employees stress the importance of Canadian work experience when applying for a job. Furthermore, they all describe the importance of work experience as increasing with the hierarchical level of the position for which one applies. At the same time, they themselves perceive foreign work experience as being comparable to Canadian work experience due to the globalization of the sector and the international comparability of the performed tasks. Like in Germany, differences regarding the technological standards and the work cultures are described as an aspect, which might cause frictions in the labour market integration process. Characteristic for Canada is that interviewees describe Canadian work experience as having a signalling effect to employers for having adjusted oneself towards the Canadian labour market and having demonstrated a commitment to the country.

One Canadian employee very representatively describes the greater importance of work experience in comparison to formal qualifications as follows:

So formal education is not really important. I mean it's important when they put a certain degree in a position as a requirement to take that position. Otherwise in the IT industry you really want to know what he has done in the last two years. (interviewee 32)

The Canadian ICT employers see formal qualifications mainly as a matter of course that the applicants mostly have. Still they regard relevant work experience (preferably in Canada) as an even better way to demonstrate the sector-specific way of thinking and problem solving. Like in Germany, some recruiters

forecast the decreasing importance of formal qualifications compared to work experience in the future, also because of the dynamics and the short half time of knowledge of the ICT sector. Besides the argument that work experience is required to perform the job successfully, some recruiters also name their expectation of being productive in the job role from the very beginning without needing a long period of vocational adjustment. Canadian ICT companies are not very much willing to take the risk of a long period of vocational and cultural adjustment when hiring new employees, always depending on their business model and the professional role. The recruiters justify the comparatively low relevance of formal qualifications in comparison to work experience by the high labour demand in the sector in Canada.

Overall, in Germany, recruiters and employees perceive the relevance of formal qualifications in the recruiting process as high, which is less the case in Canada. Furthermore, in Germany, prior work experience is valued equally regardless of whether or not it was acquired in Germany or abroad. In contrast, in Canada, both interviewee groups (especially employees) report that Canadian work experience is very important to be successfully hired in the sector.

### Synopsis of the differences and communalities in the ICT sector

The country-specific results show that the employers themselves strongly determine the usability of foreign qualifications and work experience. In this regard, it is characteristic for Germany that formal qualifications are a relevant signal in the recruiting process, which employers use to identify eligible applicants. In comparison, in Canada, employers especially value the proof of domestic work experience as a signal for cultural and economic adjustment in the country. Both countries have in common that in the ICT sector work experience determines the labour market chances, and hence, the integration of immigrants into the labour market stronger than formal qualifications – acknowledging that different migration policies limit the opportunities of foreign trained workers in general. The following Table 4 shows the whole comparative results (differences between the two countries marked bold and italic).

# **COMPARATIVE INSIGHTS FROM THE HEALTH SECTOR**

The differences between Germany and Canada mainly derive from the different labour market situation. Overall, the employers' engagement in the recognition process is higher in Germany whereas the bridging qualification measures are longer and more extensive in Canada. Furthermore, differences occur regarding the screening efforts of the employers as well as the signalling of the employees. Within the following section, the country-specific results are presented and compared.

#### Germany

All interviewed foreign-trained employees regard their formal qualification as an absolute prerequisite to perform their job, because of their responsibility for the patients and to meet the legal requirements. The nurses perceive their formal qualifications as essential to perform their job adequately. One nurse stated: 'I think this (formal qualification) is very important, because we work with human beings and I think it's very important to be formally qualified' (interviewee 20). Most interviewed employees also emphasized the importance of further training due to medical advancement, especially in areas such as intensive care.

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	Employee	Signalling of qualifications	Applicants need to prove their formal qualifications to get a job interview	Qualifications are first and foremost regarded as a signal		Signalling of work experience	Applicants do not need an enculturation for their work experience	High signalling value of work experience	Work experience is most important signal to prove ability to do the job	Work experience in specialized and in demand fields is very important signal to differentiate oneself from other candidates		Signalling of qualifications	Applicants often already have to prove their formal qualifications within the migration process	Signalling value of qualifications is low	970-01-	
rmany and Canada in the ICT sector	Employer	Screening of qualifications	Qualifications matter to be perceived as an appropriate candidate and are checked	Qualifications serve as a signal for proving a certain analytical way of solving professional problems	Decreasing importance of formal qualifications due to the dynamics of the sector	Screening of work experience	German work experience is not required	Due to clients' requirements besides technical knowledge and skills, employees' language skills (German) can be a barrier to be hired	Work experience is regarded as crucial aspect of employability to perform the required tasks	Pre hiring screening using mainly interviews and tests (especially for technical jobs)	On the job screening by hiring employees only with a probation time	Screening of qualifications	Qualifications are not regarded as an absolutely necessary prerequisite to be considered as an appropriate candidate	Qualifications are regarded as a matter of course which applicants mostly have	Decreasing importance of formal qualifications because of the dynamics of the sector	
Differences and commonalities of Germany and Canada in the ICT sector	Stakeholder/Perspective Context	Educational system				Labour Market						Educational system				
TABLE 4	Country	Germany										Canada				

TABLE 4 Differences and commonalities of Germany and Canada in the ICT sector

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Employee	Signalling of work experience	Canadian work experience is required to avoid a long period of Importance of Canadian work experience vocational and cultural adjustment and due to expectation of increasing with the hierarchical level being productive from the beginning	Canadian work experience valued to demonstrate sector-specific Canadian work experience as signal way of thinking and problem solving of labour market integration and commitment to the country	Work experience is regarded as crucial aspect of employability to High signalling value of work experience perform the required tasks	Pre hiring screening using mainly interviews and tests (especially Work experience is most important signal to for technical jobs) prove ability to do the job	On the job screening by hiring employees only with a probation time Work experience in specialized and in
Employer	Screening of work experience	Canadian work experience is required to vocational and cultural adjustment a being productive from the beginning	Canadian work experience valued to den way of thinking and problem solving	Work experience is regarded as perform the required tasks	Pre hiring screening using mail for technical jobs)	On the job screening by hiring
Country Stakeholder/Perspective Context	Labour Market					
Country						

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Furthermore, all interviewed nurses went through the recognition process with the responsible German recognising body. They all report the work experience gained during this process was useful not only to adjust to the German work culture, but also the broader German health system. In addition to these benefits, interviewees from some countries also mentioned their adjustment to German medical equipment. Work experience is evaluated by the foreign trained employees as a factor that enables them to do their job better and more efficient because of their routine. Another interviewee describes the effect of work experience on the job: 'It is much easier if you have more work experience to notice everything and the react quickly. It makes it easier to work autonomously' (interviewee 24).

The recruiters also stress the absolute necessity of the legally required formal qualifications, which the responsible body needs to recognize by issuing the allowance to perform work as a nurse. All recruiters state that this authorization is essential to be able to hire a nurse in Germany. This consistent standard also facilitates the hospitals' human resource planning. However, all recruiters mention that they often find the decisions surrounding the recognition process of foreign-trained employees to be opaque and difficult to comprehend.

One recruiter justifies the importance of formal qualifications as follows: 'You need to have a consistent standard so that you can guarantee the patients' safety' (interviewee 14). All recruiters stated that the concrete requirements regarding work experience depend on the position in terms of specialization and the level of responsibility. Even though they are aware of differences in the medical standards across countries, the recruiters state that foreign work experience is valued at par with domestic experience.

All recruiters characterize the labour market situation in the German health sector as challenging, especially for qualified nurses. The lack of supply forces them to lower their requirements especially regarding work experience.

#### Canada

Like in Germany, employees state that formal qualifications are an absolute prerequisite to find a job as a nurse due to legal requirements. They all went through the recognition process with the responsible provincial recognising body (College of Nurses Ontario (CNO)). The most striking difference between both countries is that the majority of the interviewed nurses in Canada expressed stronger views than those in Germany that the recognition process they went through is very difficult and lengthy. Furthermore, they frequently reported that they were underemployed during the long recognition process, which caused financial hardship and prevented them from using their full skill set over a significant amount of time. However, they describe the work experience gained during this process (the necessary practical hours for the recognition) as absolutely crucial and important to adjust to the Canadian work culture and especially to get familiar with the Canadian health system and the role of a nurse within it as well as depending on the country of origin with the Canadian medical equipment and standards. But, due to their limited employability before the recognition by the responsible body (CNO), the Canadian nurses also indicate problems of skill loss during this process, which none of the nurses in Germany reported.

Canadian foreign-trained nurses perceive that their work experience enables them to perform their job effectively still depending on the actual vacancy. The essential relevance of formal qualifications in comparison to work experience is described by one interviewed nurse: 'I couldn't even say how important it is cause it is mandatory to get in' (interviewee 44).

The Canadian recruiters also emphasize the absolute essential necessity of the legally required formal qualifications and the respective license to be able to be employed as a nurse in Canada and

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because this guarantees patients' safety. Like in Germany, all recruiters report the concrete requirements regarding work experience as depending on the open position in terms of specialization and level of responsibility. The Canadian recruiters also state that foreign work experience is valued in the same way as domestic experience.

The recruiters clearly state the greater importance of qualifications in comparison to work experience. One interviewee explained that: 'I would say work experience is somewhat important, not essential. So, that is the starting point of getting into health care is having formal qualifications. After that everything else is a bonus' (interviewee 42).

The recruiters describe the effects of the applicants' work experiences mostly as a factor that helps people to perform their job better: 'It all depends on individual competition. But the more experience someone has, the more situations they have been in and the more equipped they are to handle different situations' (interviewee 43). Even though work experience is regarded as an advantage to be hired on a more senior position they all affirm that applicants without work experience are also offered a chance to acquire this experience.

A significant difference to Germany is that Canadian recruiters characterize the demand in the Canadian health sector especially for qualified nurses as quite moderate. There is not really a lack of supply of qualified nurses. All recruiters report that neither they nor the hospitals are very much engaged in the recognition process. They do not support applicants from abroad with this process.

Overall, in both countries, all interviewees perceive formal qualifications as essential to perform the job of a nurse. Furthermore, they all considered work experience as an aspect that facilitates effective job performance, whereas the necessity of having work experience depended on the aspired position.

#### Synopsis of the differences and communalities in the health sector

Comparing the situation in the health sector in both countries shows that the usability of foreign qualifications and work experience is strongly determined by the similarity of the immigrants' country of origin to the migration country. In the case of Germany, the specialities of the German VET system in terms of practical experience are a relevant obstacle for labour market success and an aspect employers screen for. However, the labour market situation and the lack of qualified nurses forces them to lower their expectations in this regard. In Canada, the specialities of the Canadian health system and the role of a nurse in this system form a significant burden for nurses who have been qualified abroad, which is why Canadian hospitals value domestic work experience when hiring foreign trained nurses. Both countries have in common that formal qualifications and their official recognition by a state recognising body mainly determine labour market access for foreign-trained nurses. The following Table 5 gives an overview of the comparative results (differences between the two countries marked bold and italic).

### DISCUSSION

The results indicate several significant differences as well as some commonalities between both countries.

In both countries, the ICT sector is characterized by the perception that formal qualifications are less important than work experience, whereas it is contrary in the health sector (*sector regulation effect*). However, even in the ICT sector, formal qualifications still play a bigger role in Germany than

													ropment
	Employee	Signalling of qualifications	Acquisition of the necessary signals for the labour market requires a recognition process which varies depending on country of origin (EU/Non-EU)	High signalling value of qualifications (licences)	Formal qualification absolute prerequisite to perform the job (responsibility for patients and legal requirements)	Enculturation of qualifications needed by going through a recognition process with the recognising body	Licence provides the culturally valid signal to enter the labour market	Signalling of work experience	Work experience gained during recognition process useful as signal for adjustment to Canadian work culture, health system and partly medical equipment	Relevant work experience is essential signal to get access to specialized fields and/or more senior positions, because all eligible applicants have the same license	Work experience as signal to perform the job with routine and autonomy		
lities of Germany and Canada in the health sector	Employer	Screening of qualifications	Employers strongly engaged in the individual recognition process and provide assistance to employees	Employers are critical about methods and decisions of recognising bodies	Recognising bodies perform extensive screening of the qualifications before application process and make decision mainly based on document checks	Common qualification standard important for patients' safety and HR planning		Screening of work experience	Lack of practical experience perceived as problematic due to characteristics of the German VET system in comparison to other countries	Employers forced to lower their requirements regarding work experience due to lack of qualified nurses	Employers perform additional job-related screening focusing on work experience (interviews and probationary work)	Required work experience depends on position (specialization and level of responsibility)	Foreign work experience valued at par with domestic experience acknowledging different national medical standards
Differences and commonalities of	Stakeholder/Perspective context	Educational system						Labour Market					
TABLE 5	Country	Germany											

(Continues) | 1

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(Continued)	
Table 5	

Developm	ent												
Employee	Signalling of qualifications	Acquisition of the necessary signals for the labour market requires a very difficult and lengthy recognition process	High signalling value of qualifications (licences)	Formal qualification absolute prerequisite to perform the job (responsibility for patients and legal requirements)	Enculturation of qualifications needed by going through a recognition process with the recognising body	Licence provides the culturally valid signal to enter the labour market	Signalling of work experience	Problem of skill loss due to limited employability before full recognition by recognising body	Work experience gained during recognition process useful as signal for adjustment to Canadian work culture, health system and partly medical equipment	Relevant work experience is essential signal to get access to specialized fields and/or more senior positions, because all eligible applicants have the same license	Work experience as signal to perform the job with routine and autonomy		
Employer	Screening of qualifications	Employers stress greater importance of qualifications in comparison to work experience	Employers are not engaged in the individual recognition process and do not provide assistance to employees	Employers trust methods and decisions of the recognising bodies	Recognising bodies perform extensive screening of the qualifications before application process and make decision mainly based on document checks	Common qualification standard important for patients' safety and HR planning	Screening of work experience	Differences in the role of a nurse and legal context are perceived as biggest barriers	Canadian work experience matters to signal the adjustment towards the national health system	Employers forced to lower their requirements regarding work experience due to lack of experienced nurses (mostly young graduates)	Employers perform additional job-related screening focusing on work experience (interviews and probationary work)	Required work experience depends on position (specialization and level of responsibility)	Foreign work experience is valued at par with domestic experience acknowledging different national medical standards
Stakeholder/Perspective context	Educational system						Labour Market						
Country	Canada												

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in Canada. This could be explained by the stronger occupationally structured German labour market in comparison to the more liberal Canadian one (*country regulation effect*).

Work experience is in general perceived as being an important signal within the recruiting process and a determinant of employability, especially when organizations are hiring for senior or leading positions. However, the recruiters in both sectors report that labour market conditions are forcing them to lower their expectations especially regarding this criterion. Here, the main difference between both countries is that the German labour market is much tighter than the Canadian in the health sector. This puts German hospitals under greater pressure to find qualified nurses than Canadian hospitals (demand effect). Both countries have in common that in ICT recent work experience matters considerably due to the dynamic nature of the industry and the prevalence of innovation, whereas in the health sector the depth of work experience and subsequent routine building are valued. In Germany, neither interviewed group perceives the acquisition of work experience abroad as a serious obstacle or disadvantage in job attainment in both sectors. In contrast, all interviewed employees in Canada mention the high importance of Canadian work experience explicitly. In Germany and Canada, the technological standards of the immigrants' country of origin determine experience relevancy to a limited extent - which leads to bigger differences for nurses from countries without access to equivalent health technologies (technology effect). This effect occurs less in the ICT sector, where the interviewees in both countries describe the labour market as more globalized, with professional roles, as well as areas of responsibility seemingly more standardized and internationally comparable than the roles of nurses (internationalization effect). In Germany, the practical experience of nurses gained during their vocational training in comparison to other countries and their educational system is the biggest obstacle, whereas in Canada, the different role of nurses in comparison to other countries and their health system.

The comparison of both countries shows that the signalling model is of greater relevance for the recruiting in the health sector than in the ICT sector. In both countries, the standardized qualifications in the health sector and the strictly regulated labour market access requirements show the importance for the applicants to be in possession of the right signal to be perceived as a potential employee. At the same time, in both countries, the screening model is better able to explain the recruiting process in the ICT sector, because here rarely any standardized qualifications exist which limits the labour market access for applicants. The employers themselves set the standards and requirements and screen for the skills required for their open positions. Their screening measures and efforts are highly directed towards the former work experience of the applicants rather than formal qualifications. Table 6 illustrates the gained results relating to the relevance of the signalling and screening models in the different contexts.

Besides these general relationships, the following tendencies have been identified in the case studies. In general, a greater extent of regulations increases the relevance of signalling and screening by

		Importance of work exp	erience
		High	Low
Importance of qualifications	High	Signalling high	Signalling high
		Screening high	Screening low
	Low	Signalling low	Signalling low
		Screening high	Screening low

**TABLE 6** Relations between relevance of qualifications and work experience and the use of signalling and screening

trend. In contrast, similarities between the host and home countries (in terms of technological standards, structures of the educational systems as well as the globalization of the sector-specific labour market) decrease the relevance of signalling and screening by trend.

From an internationally comparative point of view, the results suggest that there is a connection between the existing occupational orientation in a country (or in a sector) and the relevance of signals in the recruiting and recognition process. On the contrary, stronger liberalism of the national (or the sectoral) labour market by trend leads to a stronger necessity of screening measures. Comparing both countries, screening is more intensive in Canada than in Germany and the signalling value of foreign qualifications after a successful formal recognition seems to be slightly higher in Germany.

Furthermore, the results show that so far in practice only parts of the available measures to overcome the existing double information asymmetries are used. Currently there are very limited efforts on the employer side to signal their expectations and requirements to the applicants. Even though the above analyses focus on information asymmetry I, the case study results also show that so far information asymmetry II is barely addressed by any measures undertaken by both stakeholders. Knowledge about the requirements and expectations of the employers is essential for foreign-trained applicants, increasing these measures could improve and speed up their applications and integration process significantly. Hence, the further development and the increase of pre arrival services as well as integration courses, counselling services and cultural trainings could facilitate the actual situation. In this regard, Canada already has measures in place such as pre-arrival service agencies abroad and special immigrant services in the communities, whereas Germany still needs to establish comparable structures. Furthermore, for employers, there is potential to improve their information policy regarding the recruiting so that the applicants can enter the recruiting process better informed.

## CONCLUSION

The results indicate that the communication (exchange of information and mutual clarification of expectations) between foreign-trained applicants and employers (as well as if applicable recognising bodies involved) determines to a great extent the length, costs and success of this process. In Germany, language barriers and the relevance of formal qualifications are the main obstacles for immigrants to get access to the labour market, whereas in Canada, the necessity of domestic work experience appears to be a general obstacle for applicants. In Germany, the differences of the German VET system in comparison to other educational systems seems to be problematic to a certain extent, especially in the health sector. In comparison, in Canada, the differences of the Canadian health system in comparison to other countries are reported as the most significant obstacle for labour market success. Both countries have in common that in the ICT field requirements set by the employers are regarded as being most problematic, whereas in contrast, in the health sector, immigrants face more systemic obstacles relating to the structures of the educational system (Germany) and the labour market (Canada). These systemic obstacles diminish the value of signals in the labour market in both countries. Furthermore, the results of this study prove that currently the recognition process is focused on the obligation of foreign applicants to signal his/her qualifications appropriately, whereas the prevalent lack of information on the applicant's side regarding the requirements and expectations of employers is largely neglected. The stakeholders involved in the recognition process (regulatory organizations, employers, consulting agencies, etc.) should ensure fairness and transparency. These aspects should be addressed when considering improvement of the recognition process as well as in future research. Reliable data would be required to provide additional information to foreign applicants prior to their migration and to further detail how they can optimally prepare in terms of language



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skills, qualification and skill set adjustment as well as respective documentation. In addition, further studies on the quality of the recognition process and the role of recognition bodies are required.

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