

POLICY BRIEFING

Recognition of professional qualifications

Howard Davies

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European University Association asbl

Avenue de l'Yser 24

Rue du Rhône 114

1040 Brussels

Case postale 3174

Belgium

1211 Geneva 3, Switzerland

+32 (0) 2 230 55 44

+41 22 552 02 96

www.eua.eu · info@eua.eu

This policy briefing, which covers developments up to the end of December 2023, has three sections:

- A. The European labour market context
- B. Developments in the higher education sector
- C. Focus on three countries/regions: Ukraine, United Kingdom, Western Balkans

The qualifications landscape continues to change rapidly, caught up in the instability characterising current events. Professional labour market integration poses problems at EU level and in many cases at national level too. These problems deepen, while their solutions recede into the long-term.

Academic recognition practices are challenged by the digital and green transitions. The cost-of-living crisis and the fall-out from the Covid-19 pandemic impact student mobility volumes. Course design is in flux while collaborative links thrive, but a new consensus on recognition remains to be forged.

Geo-politics intrude on labour markets and higher education by virtue of the prospect of EU enlargement and the EU's relations with third countries.

This briefing offers a digest of developments – an overview which is far from complete but furnished with multiple links for readers to follow up points of interest to them.

A. THE EUROPEAN LABOUR MARKET CONTEXT

1.1 The [programme of the Spanish presidency of the Council of the EU](#), which began in July, maintained the predictable focus on the digital and green transitions. In agreement with the next two presidency holders (Belgium and Hungary), it planned **two Council Recommendations** on improving digital skills in education and training and on the key enabling factors for successful digital education and training [see para.2.14 below].

1.2 On higher education specifically, it promised to boost the development of online certificates recognised across the EU, as well as the **automatic recognition** of professional qualifications.

1.3 The reference to professional qualifications is puzzling, given that a footnote declares the Recommendation to be “without prejudice to the system for mutual recognition of professional qualifications [...] pursuant to Directive 2005/36/EC”. One wonders if in fact it should have read *academic qualifications*, an ongoing preoccupation of the Commission. A limited automaticity of professional recognition is already enshrined in Directive 2005/36/EC; to extend it significantly would require review, consultation and legislation. The explanation lies perhaps in the [Annual Single Market Report](#) (2023): more modest in its ambition, it looks to widen the scope of the European Professional Card and the Common Training Test.

One Health

1.4 Less puzzling and very welcome was the presidency's vow to align EU health policy with the **One Health** initiative, which brings veterinary into conjunction with medical, pharmaceutical and environmental training. It increases resilience to zoonoses (infections which cross between species), such as has been thought to be the case of Covid-19.

1.5 Unfortunately, given its direct relevance to basic training programmes, neither DG GROW nor DG EAC participated in the **One Health conference** organised by the [One Health European Joint Programme](#) in June. Rather than the issues concerning first degree level, it was the OHEJP doctoral programme – closer to research and more distant from regulatory reach – which featured on the agenda.

1.6 Reviewing the lessons to be learnt from Covid-19, the [European Parliament](#) took a broader view, calling on “the Commission and the relevant EU agencies to organise targeted training activities for healthcare workers in close cooperation with professional health organisations and patient organisations, including on interdisciplinary One Health trainings”. It stressed the importance of **cross-border One Health training activities**.

1.7 For **One Health activities in the higher education sector**, see for example, the work of the [Una Europa](#) university alliance, or a short course run by the [European University Alliance for Global Health](#) (EUGLOH), or indeed [Coursera’s free MOOC](#) currently delivered by Politecnico Milano.

Professional qualifications in the EU Single Market

1.8 The 2023 Single Market Report approaches the topic of recognition by evoking both **the Market’s achievements and its challenges**. Among the shortcomings of the EU labour market – long-standing, but dramatically exposed by Covid-19 – it notes the uneven distribution of professionals (particularly in healthcare), labour shortages, skills gaps, dependence on third country nationals, and the reluctance of some member states to comply with the Directive.

1.9 A more critical overview of the **imbalance of healthcare workers** across the EU can be found in [Strengthening the European Health Union](#), published by the Foundation for Progressive European Studies (FEPS). It considers that the problem has been “hardly addressed” by the EU and goes on to catalogue ways in which the Union, notwithstanding its limited legal competence in health, could take effective action. These require the prioritisation of social needs over market freedoms. They include setting minimum healthcare standards which specify per capita ratios of professionals to population, as well as standard levels of remuneration and “a maximum number of working hours and the same training standards, for the same certifications”. The author acknowledges that such changes imply the “adjustment” of the Directive.

1.10 FEPS takes up the observation made by the Citizens Panel in the Conference on the Future of Europe, namely, that a “separate Erasmus exchange programme for medical schools” is needed, to supplement **Erasmus+** mobility opportunities. In the same spirit, the **European Health and Digital Executive Agency** (HadEA) opened a €9 million [tender](#) in June for mental health training for health professionals, supported by an exchange programme.

1.11 **Problems** abound. Paul de Raeye (European Federation of Nurses) fears a “ticking bomb”. Even a cursory scan of reports from news site EURACTIV throws up numerous symptoms of the malaise:

- ◆ [Romania](#) has called on the EU to help stem the exodus of doctors and nurses; meanwhile, [Belgium](#) has doubts about the authenticity of Romanian dental qualifications.
- ◆ [Bulgaria](#) also suffers from shortages of doctors and nurses, while in [Finland](#) it is intensive care nurses who are in short supply.
- ◆ [Poland](#)’s difficulty is rather one of churn: medical doctors who migrate to the private sector or to other countries are replaced by those incoming from Ukraine and Belarus.
- ◆ In [Portugal](#), nurses are leaving in large numbers – for Switzerland, the Baltic countries and Scandinavia.
- ◆ The November general meeting of the [Council of European Dentists](#) (CED) approved five policy papers outlining how **the role of dentist** will necessarily evolve: in response to the use of AI by unlicensed purveyors of aesthetic orthodontics; in the context of the Medical Devices Regulation; with the need for enhanced inter-disciplinary and multi-skilled training; with clarification of the role of the *specialist dentist*; and in relation to the recognition of third country qualifications (on this topic, see para.1.18 below).
- ◆ For journalistic and statistical overviews, see [EURACTIV](#) and the tabulations of healthcare professionals migration data by [Eurostat](#).

The EU healthcare workforce has already been signalled as a priority for the incoming Belgian presidency in January 2024.

Infringements of the Directive

1.12 Professionals who have difficulty in getting their qualifications recognised by foreign regulators can turn to the network of [SOLVIT](#) centres. The outcomes of SOLVIT casework inform the Commission’s enforcement activities; these can culminate in court rulings which may carry financial penalties. 2023 saw 24 such [infringement proceedings](#) initiated:

STAGE OF PROCEEDINGS	MONTH	MEMBER STATE(S)	INFRINGEMENT
Formal notice	February	Estonia	Failure to ensure that introduction of professional regulation via parliamentary amendments is covered by a prior proportionality assessment.
	July	Germany	Failure to transpose correctly the Professional Qualifications Directive 2005/36/EC.
Additional formal notice	February	Austria, Bulgaria, Croatia, Cyprus, Czechia, France, Greece, Hungary, Latvia, the Netherlands, Slovakia	Failure to ensure that introduction of professional regulation via parliamentary amendments is covered by a prior proportionality assessment.
Reasoned opinion	February	Germany, Lithuania, Poland, Slovenia, Spain	Failure to properly implement the EU Proportionality Test Directive for regulation of professions.
	July	Belgium, Cyprus, Germany, Romania	Failure to transpose correctly the Professional Qualifications Directive 2005/36/EC. “The German case addresses obstacles to the recognition of the professional qualifications of midwives. As regards Belgium, it concerns the imposition of excessive language requirements for teaching professionals seeking to work in the French Community, which severely limits the possibility of foreign teachers to work in Belgium. Concerning Cyprus, the infringement case addresses the obligation of residence in Cyprus for lawyers who wish to provide their services there, even though residence requirements are prohibited under EU rules. The Romanian case concerns the heavy restriction on veterinarians to provide their services on a temporary basis from another EU Member State, since Romanian law requires veterinarians to obtain a prior authorisation by the relevant professional Chamber before being allowed to provide temporary services.” [Commission press release, 14 July 2023]

STAGE OF PROCEEDINGS	MONTH	MEMBER STATE(S)	INFRINGEMENT
Additional reasoned opinion	October	Slovakia	<p>Failure to ensure compliance of national rules with Professional Qualifications Directive 2005/36/EC.</p> <p>“The Commission considers that Slovak rules on language checks for healthcare professionals, despite recent amendments, continue to breach EU rules. Slovak rules do not ensure proportionality of the linguistic controls. In addition, they limit the possibility for healthcare professionals wanting to work in Slovakia to prove their knowledge of the Slovak language by using only one of the three options listed in the directive, a language exam.” [Commission press release, 18 October 2023]</p>
Referral to the Court of Justice	July	Cyprus, Malta	<p>Failure to transpose correctly the Professional Qualifications Directive 2005/36/EC.</p> <p>“According to the Commission:</p> <p>The Cypriot legislation imposes unjustified preconditions for the recognition of professional qualifications of engineers and architects and does not fully ensure the automatic recognition for architects.</p> <p>The Maltese legislation imposes additional trainings and language requirements on medical and para-medical professions. In addition, it imposes excessive procedural and documentary requirements for veterinarians who wish to provide temporary services in Malta.” [Commission press release, 14 July 2023]</p>

Infringements may be occasioned by a variety of factors: delays in parliamentary or bureaucratic processes, reluctance of regulators to depart from established practices, protectionist attitudes within the professional bodies.

Measures in train

1.13 At EU level, what measures are being taken to further integrate the EU labour force? They are many and varied. The **Fit for Future platform** has convened a [consultative stakeholder group](#) consisting of social partner bodies and one academic from the University of Zagreb. It is working on eight topics, including professional mobility and the Digital Europe Programme, with a view to identifying ways of simplifying legal and administrative procedures.

1.14 The EU's **taxonomy of European Skills, Competences, and Occupations** (ESCO) has significantly expanded its datasets. Digital skills are of such high priority that ESCO has introduced a [digital label](#) to highlight each of the 2011 items in its list. The Excel file is downloadable, as are similar sets of green (570) and language (346) skills. Human and AI agency has been used to cull the data from job advertisements and other employment related material. The hope is that the resource will assist policy makers and employers in upgrading and further integrating the EU labour force.

1.15 Currently making its way through the EU co-decision procedure is the proposal for a **Single Market Emergency Instrument** (SMEI), intended to boost the mobility of services and goods in times of crisis. The [European Parliament's resolution](#) calls for fast lane transit of qualified professionals, supported by accelerated recognition procedures.

1.16 In the same line of thinking, although not limited to crisis situations, is the Commission's September [proposal for a Directive](#) on **cross-border associations**. Essentially, this would allow non-profit organisations to enjoy automatic recognition of their legal personality across the EU and European Economic Area. In the context of the internal market in services, there could be benefits in terms of organisational governance and the mobility of individual practitioners. It remains to be seen how relevant this might be for the alliances generated by the [European Universities Initiative](#).

Third country qualifications

1.17 Volumes of **inward migration**, apparently resistant to consensual management by member states, do little to ease the problems of the EU workforce. [Eurostat data](#) and analysis shows that workers originating from outside the EU have a higher over-qualification rate than indigenous workers, but this does not mean that they fill the gaps in the high-skill labour market.

1.18 **Commissioner Schmit** (Jobs and Social Rights) is [quoted](#) as saying that "We all agree that we need legal, professional immigration in a certain number of sectors where there is a high need, which we will not be able to cover from the inside of the EU". At the same time, he calls for the revaluation of lowly-paid professions held in low esteem, as well as greater possibility of cross-over between academic and vocational education and training.

1.19 In November, the Commission published a [proposal](#) for an **EU Talent Pool**. It would consist of an online platform designed for third-country job-seekers, for whom recognition procedures would be clearly set out. The measure would also allow member states greater scope in matching workers to jobs. How this might "foster a level playing field between national labour markets as migration destinations" will doubtless be the subject of intense debate.

1.20 Previous briefings have reported on the professional recognition measures enshrined in **EU trade agreements** – with Canada, Chile, New Zealand and others. Progress is being made in the ongoing talks with [Indonesia](#). Where no agreement exists, recognition can be problematic; [Portuguese press reports](#) highlight the obstacles faced by Brazilians and other third country doctors.

EU legislation

1.21 In the course of the year there have been three developments regarding the **text of Directive 2005/36/EC**:

- ◆ In September the Commission [proposed an amending Directive](#) which would introduce specific reference to the training of **general care nurses in Romania**. Essentially (and on the basis of a precedent set for Polish nurses) it would amend Article 33a on acquired rights, in order to accommodate those nurses who had successfully completed the upgraded programme of basic training now accepted by the Commission. Following minor amendments by the European Parliament, the agreed text will shortly be published in the Official Journal.

- ◆ In October the Commission issued a [Delegated Decision](#) amending and correcting **Annex V**. It updates, for each member state and for each of the seven sectoral professions (those subject to automatic recognition), the evidence of formal qualification, the title of the relevant certificate, and the awarding body. It also contains UK information covering the period up to the end of 2020. A further update is scheduled for early 2024.
- ◆ Also due for adoption in 2024 is **another Delegated Act** further amending Annex V. EUA briefings have regularly reported the complaints by professional bodies that the Directive fails to keep pace with academic and professional developments. The proposed Act will incorporate recommendations made by the analyses of dentists, general care nurses and pharmacists commissioned by DG GROW (and also reported in our previous briefings). Some suggestions, however, are – in the view of the Commission – beyond the scope of delegated acts:
 - ◆ Increase the number of hours of training
 - ◆ Look into changing minimum length of prior education
 - ◆ Include simulation in training for nurses
 - ◆ Introduce learning outcomes and competence-based approach for dental practitioners

They require revision of the Directive by the full legislative process.

1.22 The Group of Coordinators

Regular readers will be aware that the implementation of the Directive is overseen by DG GROW with the assistance of a **group of national coordinators**. Although the [documentation](#) available publicly is not always complete (agendas and minutes may be in draft rather than confirmed), it is possible to give an idea of the range of topics under discussion in 2023. Tabulated below is a selection of substantive items:

DATE OF MEETING 2023	AGENDA / MINUTES	TOPIC
March	Draft agenda and confirmed minutes	<ul style="list-style-type: none"> ◆ Plan to update basic training requirements for dentists, general care nurses and pharmacists, for Delegated Acts in 2024 ◆ Recognition of third country qualifications ◆ Guidance on implementation of the Services Directive ◆ Provision of services by UK nationals in the framework of the EU-UK TCA
May	Draft agenda and confirmed minutes	<ul style="list-style-type: none"> ◆ Single item: Recognition of third country qualifications – comments and queries from member state representatives. They requested further information.
July	Agenda and minutes	<ul style="list-style-type: none"> ◆ Recognition of third country qualifications – summary of a Recommendation to appear subsequently ◆ Audit on recognition of professional qualifications by the European Court of Auditors, with report to be published in September 2024
September	Agenda	<ul style="list-style-type: none"> ◆ Common training frameworks ◆ ENIC-NARIC network and centres ◆ Proposed legislation on upgrade of basic training requirements for Romanian general care nurses [see para.1.22 above]

DATE OF MEETING 2023	AGENDA / MINUTES	TOPIC
December	Draft agenda	<ul style="list-style-type: none"> ◆ Common training frameworks (physiotherapists) ◆ Delegated Act on dentists, general care nurses and pharmacists ◆ ... and – a very welcome innovation – a full set of agenda papers

B. DEVELOPMENTS IN THE HIGHER EDUCATION SECTOR

2.1 The **Lisbon Recognition Convention** (LRC) is now 26 years old. In late 2022, the [Convention Committee](#) elected new officers. It adopted a second monitoring report on LRC implementation, but this has still not shown up on the [Council of Europe publications site](#). Following ratifications by Turkmenistan (April) and Monaco (May), 56 states are now parties to the Convention.

2.2 The LRC’s peer convention covering countries in **Latin America and the Caribbean** dates back to 1974, but in January a new [Regional Convention on the Recognition of Studies, Diplomas and Degrees in Higher Education in Latin America and the Caribbean](#) was formally registered at the United Nations, having entered into force a year earlier. The Holy See and the Netherlands are the only European signatories thus far. Both Conventions will be implemented in alignment with UNESCO’s [Global Convention](#).

2.3 While the EHEA has its own qualifications framework, recognition in the EU and other European countries relies heavily on the tabulation of qualification levels set down in the European Qualifications Framework for lifelong learning (EQF), the upper levels of which are consistent with the EHEA’s bachelor’s-master’s-doctoral structure. At the end of last year the European Commission ran a consultation exercise to determine how well the EQF was performing in terms of improving the transparency, comparability and portability of qualifications. The **EQF consultation** closed in January having elicited a [meagre response](#).

2.4 The European Students’ Union (ESU) responded in detail. Its [submission](#) lists **shortcomings of the EQF** and the national qualifications frameworks (NQFs) referenced to it. ESU found that NQFs are used inconsistently or not at all, for example in relation to informal and non-formal learning. In general, they fail to accommodate micro-credentials and short cycle qualifications. The underlying cause of many problems, according to ESU, is the ‘poorly designed process of writing learning outcomes’. Business sector responses (from Denmark and the Netherlands) urged the Commission to better articulate the EQF with labour market needs and to raise its profile among business users.

2.5 A useful historical **inventory of the current 34 NQFs** has been assembled [online](#) by the European Centre for the Development of Vocational Training (CEDEFOP). Each NQF is lodged in a national database of qualifications; work on linking these, their design and functionalities, is being undertaken by the European Training Foundation (ETF). See the [presentations from its June webinar](#).

2.6 Equally useful for staff in institutional admissions offices grappling with the **recognition of micro-credentials** is the handy online [Micro-Evaluator](#) developed by Nuffic, the Dutch national recognition agency. Nuffic’s now concluded [I-AR project](#) also yielded a number of other extremely useful documents, including a new edition of the EAR Manual, guidelines of automatic recognition, and an overview of EHEA academic qualifications by country and by Bologna cycle.

2.7 The ESU reponse cited above is symptomatic of a wider trend: the accelerating **shift of attention** from the instruments of recognition to the quality of their implementation. Our previous briefing signalled the Commission's intention to get a European Quality Assurance and Recognition System up and running by 2025. The published [minutes of the February meeting of the EEA Working Group on Higher Education \(WGHE\)](#) gave an idea of the system's likely remit. By linking automatic recognition and quality assurance more directly, it would remedy a situation in which:

"In most Member States, the decision making on the recognition, with a few exceptions, has been decentralised. Often the related decision making is done by HEIs, which has led to variations in implementation of automatic recognition and inconsistencies between and within institutions. Unclear competences, limited picture of student experience and confusion about the difference between recognition and access on the one hand, and admission to specific studies on the other hand, are barriers to automatic recognition. To overcome these issues, the report concludes that Member States may consider to: (a) give the competence for automatic recognition decisions to a dedicated body, while keeping the autonomy of HEIs in selecting and admitting students to their programmes. The distinction between recognition and admission would become clearer in practice; (b) better integrate recognition processes into external quality assurance procedures and encourage HEIs to do the same for their internal quality assurance; and (c) collect data and evaluate recognition decisions."

The minutes reveal that this bleak picture of institutional incapacity was not accepted by all working group members. Issues of member state competence and institutional academic autonomy are likely to dominate subsequent discussions.

2.8 Further work is already under way in the framework of the [QA-FIT](#) project. EQAR – the European Quality Assurance Register for Higher Education – has canvassed the **views of national ministries on the quality of recognition** and, in particular, their assessment of whether the well-established Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) need upgrading. (Institutions had already been surveyed by [EUA and EURASHE](#), and quality assurance agencies by ENQA). EQAR's [published analysis](#) suggests that indeed it is time to revisit the ESG:

An overwhelming majority of respondents agreed that the development and implementation of QA had a positive impact on their higher education system and underscored the role of the ESG's in fostering transparency and trust among member countries with a focus on accountability-driven objectives.

Considering the future perspective of the ESG, most of the ministry representatives agree that some form of minor or major revision of the current ESG is needed, and that fundamental values and social dimension issues should be addressed to some extent."

It is expected that ministers will present a formal request when they meet in Tirana in 2024.

2.9 Meanwhile, the [Constructing Recognition in the EHEA \(TPG-LRC CoRE\)](#) project, linked to the Bologna Process Thematic Peer Group which focuses on the topic, has convened focus groups to further sound out the view of institutions on the quality (assurance) of recognition processes. The report on this topic is due in the spring of 2024.

2.10 Another Thematic Peer Group dedicated to quality assurance has produced a report on [Approaches to Quality Assurance of Micro-Credentials](#). In the wake of the [Microbol](#) project, it confirms that **micro-credentials** fall within the scope of the ESG; in practice, their quality should be internally assured by the course producers, the higher education institutions and the relevant sectoral labour market organisations acting in concert.

2.11 **Digitalisation** is seen as the key to securing the standardisation, and by extension the quality, of recognition practices. Leading the development process is [EQAR](#) which has already turned its attention to Europass, the Diploma Supplement, the European Digital Credentials for Learning (EDCL), and the European Blockchain Services Infrastructure (EBSI). EQAR's forthcoming guide to the 'Digitalisation of Recognition Tools' will be welcomed by all who are bewildered by the proliferation and the technical complexity of current initiatives.

2.12 These initiatives converge in the **European Learning Model** (ELM), version 3 of which was launched by the Commission in May. It allows "for the documentation of learning data and the creation and issuance of digitally-signed credentials". Open source and interoperable, it inhabits individual digital wallets which facilitate cross-border access to higher education and the labour market. A hugely ambitious venture, its architecture, content, objectives, and intended benefits to lifelong learners, institutions and employers are set out in DG EMPL's [online Introduction](#). An English-language [video](#) is available as an additional guide to ELM's complexity and utility. From November, a new facility will be added: institution and programme accreditation information will be fed in to the database via the European Digital Credential Infrastructure (EDCL).

2.13 ELM sits under the umbrella of **data protection** guaranteed by [Europass](#). How student data is captured and used by institutions is a related but separate matter. A UK-funded research team has come up with reflections and recommendations which are generalisable to all EHEA countries. Interested readers are referred to a [WONKHE article](#) of July and its links.

2.14 Reinforcing the drive to upskill the wider population are two **Recommendations adopted by the Council** in November: on the [key enabling factors for successful digital education and training](#), and on [improving the provision of digital skills and competences in education and training](#). There is considerable overlap between the two. The second has a more direct bearing on higher education and Article 8, quoted here *in extenso* urges member states to:

8. Foster the development of a wide range of digital skills and competences in higher education and address ongoing and emerging mismatches. In particular, and with due regard to academic freedom and the autonomy of higher education institutions, Member States are recommended to:

- a. encourage higher education institutions to promote a provision of digital skills and competences that is both general and, where relevant, sector-specific, and promote the cooperation and exchange of good practices among higher education institutions and all relevant actors on curriculum development, delivery and assessment. This could include, for example:
 - i. learning opportunities and courses for the development of digital competence across levels and disciplines with the objective of strengthening the provision for all students, regardless of the sector of their professional career;
 - ii. flexible, tailored, and digitally accessible learning opportunities on advanced and specialist digital skills, including through short courses that may lead to micro-credentials.
- b. facilitate and encourage exchanges between different sectors of industry (including SMEs) or professional groups and higher education institutions to develop interdisciplinary courses and further embed advanced and specialist courses on digital skills across degrees and respond to specific labour market needs;
- c. provide support for transparency and quality assurance, and for the recognition of academic qualifications and, if appropriate, micro-credentials on digital skills;
- d. recognise the efforts of teaching staff and higher education institutions in strengthening the provision of digital skills and competences to all students. Encourage and promote the mobility of teaching staff between higher education institutions and, when relevant, between academia and the private sector;
- e. support higher education institutions in encouraging students, and particularly women, to enrol in and complete studies focusing on developing advanced skills in a number of digital domains (e.g. hardware, software, digital design, digital integration, data science, AI or cybersecurity) and promote, where relevant, the development of advanced digital skills within other disciplines.

C. FOCUS ON THREE COUNTRIES/REGIONS: UKRAINE, UNITED KINGDOM, WESTERN BALKANS

3.1 While the main preoccupation of the EU and of other non-EU European countries has been military assistance and humanitarian aid, there have been developments on other fronts as well. At the end of last year, the EU allocated €54 million for an [Interreg \(regional development\) project](#) to boost **cross-border cooperation between Ukraine and Romania**. It had a triple focus, investing in inclusive education (e.g., infrastructure, educational plans, partnerships between institutions), as well as in healthcare and nature preservation. Additional monies then became available following the suspension of Belarus and Russia and in August the Commission opened a [consultation](#) on how the project specifications might be amended.

3.2 The Commission had reacted early to facilitate **Ukrainian student access to higher education institutions in the EU**. In the spring of 2022, in conjunction with CIMEA, the Italian NARIC, it organised [online training](#) for credit evaluators, backed up by set of published [guidelines](#).

3.3 Alongside these initiatives, work was proceeding on the referencing of the **Ukrainian national qualifications framework** to the EQF. A [comparison report](#) on the two frameworks came out in February. This in turn was backed up by a [webinar](#) available on YouTube. The comparison exercise was concerned primarily with academic qualifications. The codification of professional qualifications in Ukraine is also under way, steered by the Ukrainian National Qualifications Agency which devolves certain measures (notably the acquisition of qualifications through non-formal learning) to sectoral Qualification Centres. Ultimately, Ukraine intends to come into line with the *acquis communautaire* and the relevant recognition Directives.

3.4 In March, the Commission published an [overview](#) of all the **measures taken to support Ukrainian refugees** arriving in Europe. It cited the provisions of Erasmus+, including online language support, and committed funding to the creation of an open educational digital environment for students who have fled Ukraine or have been displaced in the country. It also noted that a “dedicated €25 million fellowships” scheme has been launched under the Marie Skłodowska-Curie Programme and a €20 million action has been made available by the European Innovation Council to support deep tech start-ups in Ukraine. The Horizon Europe ERA4Ukraine initiative has served as a one-stop shop for information for researchers fleeing Ukraine, working jointly with the Member States and Horizon Europe Associated Countries.”

3.5 A further [Communication](#) came in June, assessing the impact of the Commission’s advice on the **recognition of Ukrainian professional qualifications**. In annex are details of measures taken by member states. In general, the absorption of Ukrainian professionals was regarded as very successful, particularly in Central and Northern Europe. Interestingly, the research found that the “challenge of missing evidence of qualifications turned out to be less important than during previous inflows of refugees. Thanks to the Ukrainian EDEBO database many people fleeing the Russian invasion were able to provide evidence of their qualifications. The close cooperation with Ukrainian authorities to help Member States use the database has been very useful. At the same time, the European Qualifications Passport for Refugees has hardly been used by people enjoying temporary protection.”

3.6 In June, the EU and Ukraine signed a formal [Arrangement for Cooperation on Education](#). It envisages **bi-annual meetings at ministerial level**, designed to boost Ukrainian participation in existing EU programmes. Specifically, it notes that the “Ministry of Education and Science of Ukraine should also work to facilitate the recognition in Ukraine of academic qualifications obtained in the EU Member States, including by supporting the National Information Centre of Academic Mobility (ENIC Ukraine) in the framework of the Bologna Process.”

3.7 These developments taken together will culminate in **mutual recognition regimes** for both academic and professional qualifications.

3.8 In July EUA published a set of recommendations for [supporting the Ukrainian university sector](#). The first of these advocated **inter-institutional partnerships** with a focus on developments such as joint degrees. The point was taken up recently by the Ukrainian deputy minister in a [speech](#) to the Magna Charta Universitatum conference in Łódź, Poland. With the eventual reconstruction of Ukraine in mind, he stressed the importance of reversing the brain drain. Returning refugee students who had been welcomed abroad (he cited Poland in particular) should be able to enrol in home institutions enjoying creative collaborative links with foreign universities.

United Kingdom

3.9 In the world of globalised trade, the UK's strength lies in the service industries. Hence its interest in securing the widest possible recognition of its professional qualifications. It continues to welcome professionals from the EU, the government having extended by five years until 2028 the [post-Brexit standstill arrangement](#) by which pre-Brexit inward professional mobility was allowed to continue. This, however, was not a reciprocal deal. Having lost easy access to the EU's Single Market (with no clear opportunity in sight to regain it), the UK shifted its focus to **new trade agreements**, notably with Australia, New Zealand and the three countries of the European Economic Area (EEA). In these, it has secured mutual recognition in a number of trade-relevant professions.

Accountancy, for example, figures in the UK's FTA with **New Zealand**, as well as in the drafts of its trade agreement with the USA (which many commentators feel may never materialise).

3.10 Currently seeking a similar arrangement with **India**, it is making only slow progress. Agreement has been reached on recognition of upper secondary school qualifications but, as we noted in our Policy Briefing of last January, discussion of degrees in engineering, law and architecture appears to be a no-go area. Reports suggest that India's request for easier access to UK by its own professionals has not been greeted with a warm welcome in London.

3.11 The UK's attempts to replace the **healthcare professionals** lost to Brexit has not met with success. Both retention and recruitment are falling to alarming levels. The rate at which UK-trained doctors leave the country is one in seven, some – foreign nationals – returning home. There are now 18,000 UK-trained doctors working overseas.

3.12 By way of example, the [Royal College of General Practitioners](#) reports that the number of **qualified family doctors** has fallen by 950 since 2019 – this, despite a government recruitment target of 6,000. To make matters worse, non-UK nationals who graduate from three-year UK general practitioner programmes (they make up 46% of the total entry) cannot enter the labour market without a sponsor, a two-year visa extension, and [payment](#) of around £1,500 – a serious disincentive.

3.13 It is against this background that a dramatic step out of alignment with the EU may be imminent. The *Financial Times* reported in June ([link](#) behind the firewall) that the National Health Service was to mount a consultation on the **possible reduction of the medical doctors' training programme** to four years. A domestic recruitment drive for doctors and nurses is already on the government agenda.

3.14 Currently in its pilot phase following consultation is the [Medical Doctor Degree Apprenticeship](#) scheme. Recruited in the name of widening participation, **apprentice doctors** take up paid employment with scope for pursuing formal training to the same level as students on the traditional academic route to qualification. The scheme has been met with some scepticism, since the available funding appears to support employers rather than the training and clinical placement providers. [Universities UK](#) has given it a very cautious welcome.

3.15 Such measures would best be part of a package also featuring enhanced funding for the training providers and increased scope for clinical placements. Readers are referred to the grim overview of healthcare training recently published in [WONKHE](#).

3.16 One negotiating success is the [UK-Switzerland Services Mobility Agreement](#). It features an [Agreement on the Recognition of Professional Qualifications](#), due to enter into force in 2025. Broadly speaking, the **Swiss Agreement** follows the established logic, with provisions covering substantial difference and compensation measures, information exchange, appeals procedure, etc. It makes no specifications regarding course content; conditions particular to named professions may be set down in agreed annexes, only one of which (lawyers) has been appended.

3.17 Easy implementation, however, is not assured. Scrutiny by the [House of Lords International Agreements Committee](#) revealed that consultation with UK professional bodies had been inadequate. Some (doctors, nurses, solicitors) were unhappy that the Agreement would disrupt their existing procedures and create extra work. The Welsh administration objected in principle that relevant matters devolved to it could be overridden whenever the UK government chose to enshrine the recognition of qualifications in free trade agreements. Doubts were even raised concerning the compatibility of the Agreement with existing legislation (the Professional Qualifications Act [PQA] of 2022 – see our Policy Briefing of July 2022). The **House of Lords** committee concluded that “We are not therefore persuaded that the Government should treat this as a model for future Agreements. The Government should draw lessons from the implementation of this Agreement before pursuing future negotiations, and should avoid making Agreements which are inconsistent with the principles of the PQA.”

3.18 This recommendation is aimed at government, but also at the UK’s reconfigured [Board of Trade](#). Politicised under the Johnson administration, it is now regarded by trade experts as having a stronger business focus and a greater degree of independence. The Chief Executive of [Universities UK](#) has a seat on the Board.

3.19 Quite how the Board will operate is not clear to the wider public. A pro-European lobby group, *Best for Britain*, has set up a [UK Trade and Business Commission](#) which has proposed a detailed **draft remit for the Board**. It proposes selective and judicious alignment with EU regulatory frameworks, strenuous efforts by relevant bodies to secure sectoral mutual recognition of qualifications. It also calls for the UK government to rejoin the Erasmus+ programme.

3.20 In the quest for mutual recognition, it is the **architects** who have proved the most energetic. The UK [Architects Registration Board](#) website carries details of collaboration with US and EU peer bodies. It confirms that a “Joint Recommendation for an MRA has been submitted by the Architects Registration Board and the Architects Council of Europe and has been acknowledged within the formal governance structures of the EU-UK Trade and Cooperation Agreement.”

3.21 However, when questioned on this application by EUA at a November meeting of the **Civil Society Forum** (CSF) in London, DG Trade reported that the application had been turned down, for reasons of “asymmetry”. This implied that the professional standards required of EU architects wishing to practise in the UK were higher than those of UK architects hoping for recognition in the EU. The apparent misjudgement by the British is a missed opportunity to emulate the MRA achieved by Canadian and EU architects in the framework of the CETA.

3.22 All the other references to the recognition of professional qualifications by CSF speakers were positive. Both the EU and the UK official spokespersons said that they would welcome **proposals for MRAs** emanating from professional bodies and formulated according to the terms of Article 158 and Annex 24 of the [Trade and Cooperation Agreement](#) (TCA). The UK cited engineering, auditing and healthcare.

3.23 The CSF warmly welcomed the [news](#) of the **UK’s renewed participation in the Horizon Europe and Copernicus programmes**.

3.24 All negotiations on recognition are conducted within the framework of the **TCA**. A brief and useful [overview of the Agreement](#) is available on the website of UK in a Changing Europe, a project run by King's College London.

3.25 The UK is now a signatory to the **Comprehensive and Progressive Agreement for Trans-Pacific Partnership** (CPTPP). A ratification process has to be completed before it can accede. It joins Australia, Brunei, Canada, Chile, Japan, Malaysia, Mexico, New Zealand, Peru, Singapore, and Vietnam in a trade agreement which hopes to further the recognition of professional qualifications.

3.26 [Chapter and Annex 10](#) give the details. They encourage members to align the recognition of engineers and architects with the principles already enacted in the Asia-Pacific Economic Cooperation framework. In a large measure, the CPTPP appears to rely on bilateral agreements forged between members, these arrangements being monitored by a **Professional Services Working Group**. Minutes of the Group's meetings are not easy to trace. A [meeting in July 2021](#) heard an outline of the Canadian model of a Mutual Recognition Agreement, but it is not clear whether this was the model enshrined in its FTA with the EU (the CETA). A [fourth meeting](#) took place a year later, featuring draft guidelines on the formulation of MRAs. However, a prior requirement is no doubt the mapping exercise of the national regulatory systems which members are now engaged in.

3.27 The UK hopes for a liberalisation of trade in services, but it has to be said that its joining the CPTPP has been regarded as more for internal political effect than for economic benefit; the UK's Office for Budget Responsibility has calculated that it will bring an **increase of 0.04% of GDP** over a fifteen-year period.

Western Balkans

3.28 The **EU-Western Balkans summit meeting** held in December resulted in the [Tirana Declaration](#), in which the EU commended 'the Partners' recent agreements on [...] mutual recognition of university diplomas and professional qualifications within the region.' It hailed them as an important step towards the completion of the Western Balkans Common Regional Market (CRM).

3.29 Albania, Bosnia & Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia constitute the [CRM](#). The Market pursues economic integration for its own immediate benefit and also as a necessary stepping stone to accession to the EU. For this reason, it is modelled very closely on the EU's Single Market. **Regulatory alignment** is relevant to the [Regional Economic Area](#) (REA, set up in 2017) in which "mobility of higher education has been fostered thanks to recognition of qualifications" (p.17 of the EU's [Economic and Investment Plan for the Western Balkans](#)).

3.30 The REA lists among its **achievements**:

- ◆ Conclusion of an Agreement to open negotiations on Mutual Recognition of Professional Qualifications (MRA) for selected professions;
- ◆ Endorsement of Principles for the Model of Automatic Recognition of Academic Qualifications;
- ◆ Setting up an operational sub-regional network of ENIC/NARIC centres;
- ◆ Strengthening cooperation between Quality Assurance Agencies;
- ◆ Development of a Joint Information System for the Recognition of Academic Qualifications;
- ◆ Endorsement of the Declaration on Recognition of Academic Qualifications, annexed to the [Chair's Conclusions of the Summit in Poznan 2019](#)

3.31 The CRM is committed to further this work: instituting the free movement of services, it would operationalise the mutual recognition of professional qualifications; the free movement of people would facilitate student, researcher and professional mobility; the free movement of capital would enable cross-border higher education establishment and service provision, although this is unstated. The **CRM to-do list** cites:

- ◆ Build capacities of the ENIC/NARIC centres, Quality Assurance Bodies and Agencies and the relevant Ministries to facilitate recognition of academic qualifications and alignment with the European Commission Recommendation on Automatic Recognition of Academic Qualifications;
- ◆ Collect data on recognition decisions and maintaining the Joint Information System aimed at facilitation of recognition of academic qualifications;
- ◆ Support alignment of Quality Assurance bodies in the Western Balkans with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) and their integration into the European Association for Quality Assurance in Higher Education and European Register for Quality Assurance;
- ◆ Support development of national procedures for quality assurance aligned with the ESG.

3.32 In November 2023 the Commission published an **updated Growth Plan** for the Western Balkans. That it should follow so soon its predecessor, the Economic and Investment Plan of 2020, is no surprise, given the convulsion of the political context triggered by the Russian invasion of Ukraine and the subsequent acceleration of the accession process. The Growth Plan promises additional financial support, conditional on successful internal reforms in alignment with the *acquis*, as well as with further regional market integration as a step towards full participation in the EU's Single Market. Integration necessarily includes the free movement of services and workers. Accordingly, the Plan intends to proceed by:

building on the four ground-breaking “mobility agreements” agreed in context of the Common Regional Market with a focus on *Recognition of skills and qualifications* between the EU and the Western Balkans, including professional qualifications. These include the Recognition of Professional Qualifications of Doctors of Medicine, Doctors of Dental Medicine and Architects in the CEFTA context; Recognition of Higher Education Qualifications; Mutual Recognition of Professional Qualifications for Nurses, Veterinary Surgeons, Pharmacists and Midwives; and Freedom of Movement with Identify Cards in the Western Balkans.

3.33 The Plan also offers to:

- ◆ “boost innovation by (i) developing a **dedicated European Innovation Council (EIC) pre-accelerator** for the Western Balkans, helping deep-tech innovation companies develop their full potential with concrete ideas and investment plans and (ii) supporting and upskilling innovators and entrepreneurs, through the activities of the European Institute of Innovation & Technology (EIT) and its Knowledge and Innovation Communities.
- ◆ **Extend Europass membership** to all Western Balkan countries: helping job seekers to take the next step in their career and open up new opportunities and further support their **participation to the European Qualifications Framework Advisory Group**: facilitating transparency of skills and qualifications.
- ◆ Strengthen **active engagement in the European Year of Skills and the Pact for Skills** to promote a mindset of upskilling and reskilling, using the group of National Coordinators as a platform of exchange on skills policies.
- ◆ **Make it easier for young people to study abroad** by facilitating the recognition of academic qualifications and mobility periods.” [the emphases are those of the Commission’s Communication]

3.34 The Growth Plan comes with a budget, but **financial support** is conditional on sustained efforts to align with the *acquis*, as well as on the existence of stable relations between Kosovo and Serbia, an area in which little notable progress has been made.

3.35 All these projected measures notwithstanding, it is difficult to see how the **East-West brain drain** can be stemmed, even in the medium term. In recent months Albania has experienced difficulty in restricting the flow of healthcare workers to EU member states, and to Germany in particular. Efforts to retain doctors and nurses, as well as to persuade those working abroad to return, including financial incentives, have been backed by legislation imposing stiff conditions on those wishing to emigrate. [Student opposition](#) has been vociferous. Bosnia-Herzegovina suffers from similar problems.

3.36 In this connection, it is worth mentioning the surveys undertaken by the **Western Balkans Alumni Association**. Its [tracer studies](#), appearing so far in 2019 and 2021, provide detailed audits of Western Balkan students' impressions of their home higher education system while on mobility placement in another country. The intention is for the findings to inform the national strategic planning processes.

Comments and corrections are welcome:

empl@eua.eu

The European University Association (EUA) is the representative organisation of universities and national rectors' conferences in 48 European countries. EUA plays a crucial role in the Bologna Process and in influencing EU policies on higher education, research and innovation. Thanks to its interaction with a range of other European and international organisations, EUA ensures that the voice of European universities is heard wherever decisions are being taken that will impact their activities.

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