

Public consultation questionnaire informing the Skills Portability Initiative

Background

The European Union is working on an initiative to improve the understanding, digitalisation and recognition of qualifications and skills across Europe, regardless of how or where they were acquired (at work, in a training centre, at university, in another country, etc.).

This consultation seeks input from across the EU on how skills and qualifications are recognised and understood across borders, including in border regions where people may live in one EU country but work in a neighbouring one. (see the call for evidence attached to the email, for more information)

Target audience

- **working-age people**
- and **employers or recruiters** who assess and evaluate candidates' skills and qualifications, whether they were obtained within the EU or in non-EU countries
- other organisations involved in or affected by mobility and skills recognition (public authorities, competent authorities responsible for recognition, research institutions and civil society organisations)
- stakeholders from strategic sectors (e.g. healthcare, etc).

Why are we consulting?

The Skills Portability Initiative aims to make it easier for individuals and employers to identify, showcase, understand, trust and use skills and qualifications across the EU – whether obtained within the EU or in non-EU countries. This is key to improving the EU's competitiveness, both within its internal market and in the global race for talent. This public consultation seeks to collect evidence, experiences, and views from individuals and organisations on the challenges they face in having qualifications or skills recognised or assessed across borders, the impact of these challenges, and the possible solutions and improvements that could make recognition and skills portability simpler, faster and more reliable, including through the use of verifiable digital credentials and EU-wide tools. The results will support the European Commission's work in identifying potential policy actions and legislative options to improve the portability of skills and qualifications in the EU, while ensuring added value at European, national and local levels. This initiative has a strong focus on simplification and does not impose any new obligations on employers or workers.

CED Input to the consultation questions:

1- To what extent do you consider the following challenges related to skills portability in the EU to be a problem? *(general question: not of specific relevance for CED)*

	Not a problem at all	A small problem	A moderate problem	A big problem	A very big problem
Employers find it more difficult to understand and trust qualifications obtained in a country other than their own.				X	
Employers in other countries find it difficult to understand what skills a person has acquired through work experience.				X	
The certificates (e.g. micro-credentials) that a person receives after following a short training course have less value for employers who are unfamiliar with the course provider and the training conditions.				X	
Qualifications are rarely issued as verifiable digital credentials.				X	
Qualifications issued as verifiable digital credentials in one country cannot be easily shared with employers or authorities in other EU countries.				X	
Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly.		X			
People who have studied and acquired skills outside the EU do not have a uniform and simple way to get their qualifications recognised and their skills validated to access the EU labour market.			X		
Employers in the European Union who want to recruit people from outside of the EU struggle to understand what people can do and/or need to wait for their qualifications to be recognised.		X			

2- Do you think there are other issues that make it harder for people to have their skills and qualifications understood, recognised and valued in another country? Yes No**3- Have you had any personal experiences with any of these challenges, for example, when applying for jobs in a different country, recruiting people from another country or dealing with the recognition of qualifications or validation of skills?**

Yes No

EU Tools

4- With which of the following EU tools supporting transparency, comparability and recognition of skills and qualifications are you familiar? (Please select all that apply)

- European Qualifications Framework (EQF)
- Europass Framework
- European Skills, Competences, Qualifications and Occupations (ESCO)
- The Professional Qualifications Directive (Directive 2005/36/EC)
- European Quality Assurance in Vocational Education and Training (EQAVET)
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)
- European Credit Transfer and Accumulation System (ECTS)
- Database of External Quality Assurance Results (DEQAR)
- National Academic Recognition Information Centres in the European Union (NARIC)
- European Digital Credentials for Learning (EDC)
- Single Digital Gateway and Once-Only technical System (OOTS)
- European Learning Model (ELM)
- [EU Digital Identity Wallet](#)
- Databases of qualifications from the National Qualifications Frameworks
- Diploma Supplement and Certificate Supplement

5- Would you suggest changes to any of the above tools to enhance the portability of skills and qualifications in the single market? If so, please elaborate.

Yes, the CED calls for the priority revision of the **Professional Qualifications Directive (2005/36/EC)**, with the update of Annex V by means of a delegated act, to incorporate a

list of practical competences of undergraduate dentists. Furthermore, in order to support a more balanced, skilled, harmonized and mobile dental workforce, practical and clinical training set out in Articles 34(2) and 34(3)(e) of the Directive must be urgently clarified and strengthened, by the establishment of a minimum number of required clinical training hours in direct contact with patients. This requirement must be associated with early and criteria for meaningful clinical exposure in undergraduate dental training.

It is essential to establish a clear and enforceable definition of the practical and clinical training components within the required 5,000 hours of full-time theoretical and practical education, together with strengthened and harmonised standards for what constitutes “suitable clinical experience”, under Article 34(3), paragraph (e). Such measures would significantly enhance transparency, strengthen the trust of competent authorities in charge of registration through improved comparability of skills, and effectively facilitate the mobility of general dental professionals. Skills are, here, understood by the CED as both basic theoretical and practical skills, as well as hard and soft skills acquired in clinical practice in undergraduate dental training programmes. These may include, but are not limited to, technical, clinical, communication, conceptual reasoning, interpersonal and social skills. Ensuring the transparency, improved harmonisation and equivalent level of dental diplomas, including clinical training skills through digital tools, would facilitate and accelerate the automatic recognition process and any effective supportive measures for the registration and integration of EU-trained dentists into the national workforce. This would in turn improve the uniform oversight of basic dental training and support national authorities to comply with automatic recognition rules.

Secondly, the CED acknowledges the central role of the **European Credit Transfer and Accumulation System (ECTS)** in supporting the equivalence of dental degrees and in enhancing transparency across the Union. However, in order to improve transparency, efficiency and effective harmonisation of minimum training requirements laid out under Directive 2005/36/EC, “expressed with the equivalent ECTS credits” (Article 34(2)), the ECTS system must ensure adequate equivalence between other national credits or mixed credits systems currently used across Member States. The European Commission should therefore work towards a better harmonisation and understanding of various credit systems and their use in different Member States. In this context, an equivalent minimum of 300 ECTS credits should explicitly correspond to the required minimum 5 years, and total 5 000 hours of study required under the Professional Qualifications Directive.

Furthermore, under the GDPR, the accessibility and transparency of digital credentials must be ensured and maintained, even when used for automatic recognition purposes, alongside the protection and security of dentists’ personal data.

Finally, the CED acknowledges the significant variations in **continuing professional development (CPD) systems** for dental professionals across Europe and the lack of common accreditation schemes. The limited or non-existent portability of micro-credentials obtained through CPD activities hinders cross-border training for dental professionals and prevents the recognition of skills acquired after the completion of undergraduate dental training and throughout life-long learning. The CED therefore **calls for the progressive extension and promotion of the use European Digital Credentials for Learning (EDC) and accreditation schemes for continuing professional development (CPD) courses** carried out by dentists in various EU countries. This should progressively lead to common recognition agreements or frameworks **for CPD credits acquired across the EU, including periodic assessments similar to those existing for dental specialists, to maintain care quality and patient safety amid increasing professional mobility**. Such frameworks or bilateral recognition agreements would enhance and facilitate common recognition of postgraduate skills and life-long training of dental professionals in various fields of dental practice across Europe. It would also help foster cross-border practice, exchange of knowledge, skills and technological advances in the professional field of dentistry and improve transparency and comparability of continuing professional developments skills.

6- To what extent do you think EU-level action is necessary for the following objectives?

	Very necessary	Somewhat necessary	Not very necessary	Not at all necessary	I don't know/Not sure
To guarantee that qualifications are transparent and evenly understood across the EU.	X				
To facilitate a common system of certification, so that knowledge and skills acquired through short training courses (e.g. micro-credentials) are understood throughout the EU.	X				
To guarantee that people can get a certificate that demonstrates what they can do, and that this validation of skills certificate is issued in a common format throughout the EU.	X				
To enhance the digitalisation and transnational sharing of qualifications in the EU.	X				
To enhance the digitalisation and transnational sharing of skills credentials in the EU (for example, the certificate you get after an official authority has validated your skills, or a diploma).	X				
To simplify, modernise and speed up administrative procedures for the recognition of qualifications across the EU.			X		
To simplify the way in which people who have acquired qualifications or skills outside the EU				X	

can get them recognised in the EU so that they can access the EU labour market.					
---------------------------------------------------------------------------------	--	--	--	--	--

7- Please elaborate :

The CED strongly supports modernising and improving administrative procedures for the recognition of dental qualifications across the EU. At the same time, the CED firmly emphasises that this must, by no means, result in expedited or rushed recognition processes or in the weakening of existing requirements or procedures for recognising both EU and non-EU dental diplomas.

Secondly, caution is needed when considering the Commission's proposed action 3, on simplifying recognition procedures for regulated qualifications and theoretical and clinical skills of third-country nationals. The competence for defining and carrying out the recognition process for third-country diplomas must remain a Member State prerogative. Competent Authorities remain the best placed to assess the current national market, and the structure and needs of the dental workforce. Member States should ensure that the recognition of dental diplomas obtained in third countries strongly adheres to and equates to all minimum training requirements for regulated professions under the Directive 2005/36/EC.

The CED therefore highlights that today's European dental workforce is not undergoing any current acute shortages in the number of practising general dental professionals, on average across EU countries.

Measures intended under the Skills Portability Initiative seeking to simplify recognition procedures with the purpose of addressing workforce shortages must therefore be separately assessed and carefully considered in the case of general dentistry.

The CED also **calls the advancement of common recognition for CPD credits across Europe, by means of bilateral agreements or common frameworks, including through periodic assessments similar to those existing for dental specialists, to maintain care quality and patient safety amid increasing professional mobility.** This framework would enhance and facilitate harmonised recognition of postgraduate skills and life-long training of dental professionals in various fields of dental practice across Europe. It would also help foster cross-border practice, exchange of knowledge, skills and technological advances in the professional field of dentistry and improve transparency and comparability of continuing professional developments skills.

The limited or non-existent portability of micro-credentials acquired through CPD activities hinders cross-border training of dental professionals and prevents the cross-border recognition of skills acquired after the completion of undergraduate basic dental training and across life-long learning.

8- In your view, how important is it for your sector or your country to attract skilled non-EU nationals to address current and future labour market needs?

- Very important
- Important
- Somewhat important
- Not important
- Not sure/ No opinion

9- In your view, how important is it in your sector or country to equip workers and employers with reliable tools to identify and demonstrate a person's skills, regardless of how they acquired them (through work or study, etc.)?

- Very important
- Important
- Somewhat important
- Not important
- Not sure / No opinion

10- Please provide further details:

Directive 2005/36/EC on the recognition of professional qualifications establishes a binding formal qualification and harmonised minimum training requirements across all EU Member States for the professional practice of dental practitioner. The list of dental qualifications across the EU are therefore listed under Annex V of the Directive and fall within the scope of automatic recognition. As a formally regulated profession, the demonstration of clinical, professional and personal skills is therefore not sufficient for recognising the right to practice dentistry. Furthermore, EU Member States are legally required to comply with minimum training requirements for the delivery of undergraduate dental diplomas and the automatic recognition of these diplomas across the EU.

The question above therefore does not apply, and cannot apply, to the professional qualification of dental practitioners. In this context, Directive 2005/36/EC must remain the primary EU legal instrument governing the formal and automatic recognition of the professional qualification of dental practitioners.

However, as highlighted further above, the CED calls for the establishment of common tools for providing proof of equal and common clinical training skills, complementing the minimum theoretical and practical training requirements laid down under Article 34.2 of Directive 2005/36/EC. Such a system would allow a shared EU system to demonstrate and harmonise clinical skills across the EU, therefore improving transparency and comparability of clinical skills, and in turn, encouraging and facilitating mobility of dental professionals, including by increasing trust of competent authorities from Member States.

11- Should new tools/policies/rules be introduced at EU level? Please provide as much detail as possible, including the needs these initiatives would address.

Please refer to the above information and answers to question 5.

The CED also **calls for the advancement of common recognition of CPD credits across Europe, by means of bilateral agreements or common frameworks, including periodic assessments similar to those existing for dental specialists, to maintain care quality and patient safety amid increasing professional mobility.**

Possible EU-level solutions

12- Imagine a system where qualifications and training or skills certificates across the EU are issued as verifiable and transparent digital credentials that can be shared, understood and processed across borders. Individuals could share their qualifications with employers or authorities in another country, and these organisations could check their authenticity quickly and securely.

Do you think such a system would lead to cost savings or reductions in administrative burden for any of the groups below? (select all that apply)

- Individuals / Job seekers
- Employers
- Education or training providers
- Recognition bodies
- Public administrations
- Other (please specify below)

13-What concerns, if any, would you have about EU-level digital credentials for qualifications? (Select all that apply)

- Data privacy or security issues
- Not being legally valid in all countries
- Technical complexity or lack of compatibility between systems
- Risk of excluding people with low digital skills or poor internet access
- Costs of adopting or using the system
- Doubts about who issues or verifies the credentials
- Dependence on specific platforms or providers
- None of the above
- Other (please specify)

14- If EU-wide digital credentials for qualifications and skills were available, how likely would you be to use them and/or accept them if someone were to share them with you?

- Very likely
- Somewhat likely
- Somewhat unlikely
- Very unlikely
- Don't know

15- If the EU could improve or create new online/digital ways for people to show and share their qualifications, which changes do you think would help the most? (Choose up to three)

- Providing a database of qualification standards that can be consulted by all.
- Ensuring that digital credentials work everywhere in the EU.
- Linking digital credentials to a single secure app or 'digital wallet' for all documents.
- Uploading verifiable digital credentials in an EU Digital Identity Wallet.
- Ensuring easy access to verifiable digital credentials.
- Making it easy for schools and training providers to issue verifiable digital credentials.
- Providing a simple service for employers to check verifiable digital credentials

- Offering clear guidance and help for people using verifiable digital credentials.
- Other (please specify below)

16-What type of digital tools could be most useful to improve administrative procedures for recognition applications? (Choose up to three)

- Simple online portals where applicants can submit, track, and manage their applications in one place.
- Automated document-verification tools (e.g. authenticity checks, completeness checks, fraud detection).
- Automated translation of documents in other languages
- Digital pre-screening tools to assess whether recognition is needed and what documents are required.
- AI-assisted assessment tools to support the analysis of qualifications and identify training gaps.
- Automated notification and deadline-alert systems to prevent delays and improve communication.
- Other (please specify)

Additional comments

If you wish to add further information- within the scope of this consultation- please do so here:

--

Participation in focus group

17- Several focus groups will be organised as part of this initiative's consultation process, and we would welcome your participation. Would you like to be invited to one of these focus groups?

- Yes
- No
- Maybe, please send me additional information