

Skills portability initiative: Employers joint input

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Introduction

Further to the dedicated social partners hearing that took place on 23 January, this note outlines employers' joint views on the European Commission's proposed skills portability initiative.

Employers broadly welcome the commitment in the Union of Skills initiative to enhance skills portability and recognition across the Single Market. It is important to ensure seamless integration within existing national qualification systems, avoiding duplication or unnecessary administrative burdens, especially for SMEs. Regardless of how or where skills are acquired, they should be transparent and easily understandable across borders. In parallel, there is a welcome focus on efforts to improve the recognition of qualifications and the validation of skills held by third country nationals. This twin approach of combining the Single Market and skills of third country nationals is especially relevant in the context of helping to address labour and skills shortages and can be an important initiative in supporting the EU's overall competitiveness.

Importantly, the skills portability initiative must respect national competences when it comes to education and training systems. It can also be noted that in addition to taking steps forward on the recognition and transparency of qualifications, it is important to address other barriers to mobility and migration, namely language skills, the mindset and propensity to relocate and available housing.

I. Transparency of skills and qualifications – digitalisation

Employers positively assess the European Qualifications Framework (EQF) as an EU level tool for enhancing the transparency and comparability of qualifications through focusing on learning outcomes and a common approach to the referencing and leveling of qualifications through national frameworks to the European level. In this respect, the EQF should continue to play a leading role. Notably, and although complex to achieve, further effort should be made to establish an appropriate framework for the referencing of international sectoral qualifications and third country qualifications to the EQF. Furthermore, in order for the EQF to become a relevant and widely used tool by employers, it is necessary to further improve the comparison function in Europass. This specifically includes making the descriptions of learning outcomes for each qualification in national registers easily accessible and comparable.

The EU Digital Identity Wallet (EUDI) should be introduced across Member States in 2026 and this is something employers welcome in terms of being a practical tool to support mobility, including as concerns skills related documentation, such as qualifications, equivalence certificates and related supplements, in the form of digital credentials. It will be important that the wallet is interoperable with existing national schemes and to raise awareness of it ensuring that there is also appropriate support available at national and local level to support and implement such digitalised solutions.

A future EU initiative towards an improved portability and recognition of skills should also go hand in hand with the ongoing work at EU and national level to step up the role of micro-credentials in education and training as well as on the labour markets. Wherever micro-

credentials are organised - VET, universities, companies own frameworks - it is essential to ensure the inter-operability of micro-credentials, notably in terms of learning outcomes. In this context, it is beneficial, where possible, to ensure that micro-credentials and non-formal learning certifications are recognised and validated in a transparent and coherent way across Member States.

Given the role of the EQF and of the related tools, such as Europass and ESCO, plus the roll-out of digital credentials and the EUDI Wallet, employers consider that there is no need for additional tools to support transparency efforts.

As concerns non-regulated professions, employers support **a trust-based approach** with formal recognition undertaken only if there is a specific need.

When formal recognition is undertaken, it is essential that Member States do not create unnecessary burdens on employers at national level or in ways hindering labour mobility, such as excessive administrative requirements or lengthy procedures. As concerns the general process of recognition, it is important that traineeships or aptitude tests are regulated in the Member States.

II. Recognition processes for regulated professions

The recognition of qualifications from other Member States remains increasingly important particularly as the number of regulated professions in the EU has risen from 5400 in 2016 to 5700 in 2023. This development highlights the need to ensure that regulation is well-designed, transparent and proportionate. The EU regulation for a proportionality test provides a relevant framework for this purpose and should be applied consistently by Member States when introducing or reviewing regulated professions, in full respect of national competences and public interest objectives.

Employers broadly support the perspective towards identifying further professions that could be the subject of common training frameworks on a voluntary basis and the mapping study that the Commission is in the process of conducting in this regard. Given that the competence for regulating professions lies with Member States, such an approach, if pursued, would need to be demand-led and bottom-up and with the involvement of employers and social partners. Furthermore, in pursuing common training frameworks, it's important to be mindful not to compromise on the quality and standards of different national qualifications and training frameworks.

In addition to the potential for common training frameworks, we can also recognise the relevance of streamlining the administrative processes around recognition, which can vary from Member State to Member State, notably in terms of the time and costs involved. Technical challenges also include a lack of standardised, up-to-date information on qualifications and unclear recognition processes.

III. Recognition of qualifications and validation of skills of third country nationals

In combination with efforts to support up-skilling and re-skilling and labour market participation, skilled third country nationals (people of all skills levels) can also play a role in helping to address Europe's labour and skills needs. Whether through the future EU Talent Pool, the Blue Card directive or the students and researchers directive, the ability to facilitate the recognition and/or validation of qualifications and skills from outside the EU would be advantageous and foster skills matching in a way that addresses the interests of employers and individuals.

Employers support efforts to look at new ways to facilitate the recognition and/or validation of qualifications and skills. Taking into account the Commission Recommendation on the recognition of qualifications of third-country nationals (2003), we would broadly welcome the development of minimum procedural standards to reduce processing times and unnecessary administrative burdens as well as improving guidance and information for workers, employers and authorities. This could be done in cooperation with EU delegation offices in key third countries with a perspective towards improving information flows and the understanding of qualifications and skills prior to a third country national arriving in a Member State. The Commission could also consider common and voluntary guidance or the development of a methodology to support the recognition of qualifications and the validation of skills. This should take into account Cedefop's upcoming work on developing a methodology for comparing and recognising VET qualifications.

The further deployment of the EU Talent Partnerships with third countries as currently tested with Tunisia, Morocco, Egypt, Bangladesh and Pakistan, could also support the mutual understanding of third countries qualifications with the European Framework of Qualifications.

As part of the approach to reducing administrative burden and facilitating labour market access, we also welcome the possibility for third country nationals to access temporary work while the process to recognise their qualifications is underway.
