eua EUROPEAN
UNIVERSITY
ASSOCIATION

POLICY BRIEFING

Recognition of professional qualifications

Howard Davies

June 2021

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 brief has three sections:

    A. The Professional Qualifications Directive
    B. Academic recognition in the European Education Area
    C. The fall-out from Brexit

As we reported in the previous Briefing in January, EU policy makers and legislators are increasingly focused on the need to integrate and energise the professional labour market. This was entirely predictable, given the urgency generated by the interlocking effects of the pandemic, broader policy initiatives (the Green Deal and digitalisation) and the defence of the Single Market following Brexit.

This Briefing looks at some of the relevant developments of the last six months.

A. IMPLEMENTATION OF THE PROFESSIONAL QUALIFICATIONS DIRECTIVE

1.1   In January the European Parliament adopted a wide-ranging Resolution on [Strengthening the Single Market: the future of free movement of services](). Turning its attention to the recognition of professional qualifications, it declared itself broadly satisfied with the efforts made by the Commission to streamline professional and academic recognition; it looked rather to the Member States for more energetic commitment to shedding protectionist attitudes and regulatory misalignments:

> [Parliament ...] Welcomes the fact that the harmonisation of qualifications through mutual recognition inspired by the Professional Qualifications Directive has been successful in relation to several professions and encourages Member States to reconsider and coordinate rules governing entry and exercise requirements in relation to specific activities or professions; stresses the need to improve the comparability of levels of professional qualifications so as to ensure an easier transition towards the mutual recognition of education and training qualifications with regard to the services sector across the EU;

1.2   We reported in January on the ambitions of the EUR 5.1bi [E4Health programme](). The digital upskilling of healthcare workers loomed large in its list of priorities. Readers will be interested in the [video-conference]() set up by the Standing Committee of European Doctors (CPME) and the German Medical Association (BÄK), which covered a spectrum of opinion: practising professionals, academics, medical students, policy makers in the European Commission and the German government.

1.3   Also relevant is the one-year thematic network run jointly by Health First Europe (HFE), an umbrella stakeholder organisation, and the European Health Management Association (EHMA). Together they form the EU Health Policy Platform (EUHPP).

1.4   Prior to mutating into an official EU Stakeholder Network, the partnership issued a [Joint Statement]() which offers insights "into the skill set of the workforce of the future and into the role of healthcare professionals in promoting data-driven innovation and patient-centered and inter-disciplinary models of care". Its underlying assumption is that "[h]ealthcare professionals are still not trained and formed with a harmonised, standardised protocol. There are also neither common digital infrastructures nor consistent outcome-based policies that would incentivise an effective use of digital tools and technologies."

1.5   The Joint Statement features a useful overview of recent projects and policy initiatives in a range of specialisms, as well as a set of recommendations. Those relevant to higher education institutions are boxed below:

> 1. Create EU curricula for healthcare professionals and common definitions of professions and specialisations across Europe
>
> 4. Maximise the use of European funding instruments to support actions to tackle health workforce shortages and create EU training programmes and a solidarity scheme
>
> 5. Generate more opportunities abroad for students as well as professionals, specifically focusing on digital solutions and AI technologies
>
> 6. Include digital literacy and skills along with patient-centred care and multidisciplinary skills as core competences in undergraduate training programmes including cross-disciplinary experiences as part of the European profile of the workers of the future
>
> 8. Re-think how professional education is delivered with the inclusion of new tools (including through virtual trainings) and introduce interprofessional learning programmes that should be included in all curricula for healthcare professionals
>
> 10. Invest in cross-border eLearning opportunities and multinational research programs, also to allow professionals to develop new skills not offered in their national programmes

1.6   In an EU High-Level Roundtable event, the European Federation of Nurses Associations (EFN) threw its weight behind the drive to accelerate the digital upskilling. The event was one of the series of meetings held in the framework of the Commission's Pact for Skills.

1.7   In the area of interprofessional and multi-disciplinary training programmes, the One Health initiative (see previous EUA briefings) continues to gain traction, thanks in part to enhanced public perception of the role of animal and environmental health in the spread of COVID-19. The Federation of Veterinarians of Europe (FVE) joined with peer bodies in other healthcare professions in an online debate held in early June. Its focus was on interprofessional cooperation on COVID-19 and on anti-microbial resistance (AMR).

1.8   FVE senior policy office Despoina Iatridou provided a detailed overview of how far (in which disciplines, on which topics, to which cohorts of students, against which obstacles) veterinary schools in Europe already engage in inter-disciplinary training. Graduate studies are more advanced in this respect, whereas at undergraduate level the scope for inter-disciplinary curriculum design is limited by rigid academic structures and by current legislation. Her full findings are accessible via the Journal of Veterinary Education. Complementary overviews of other healthcare professions would be very instructive.

1.9   Infringements of the Professional Qualifications Directive continue to occur. In July 2020 the Commission referred the Czech Republic to the European Court of Justice for breaches of EU law. They involved "specific [but unspecified] requirements for certain healthcare professions [and] the status of professionals". Early this year, the February infringements package reported that matters had not yet been resolved; the Commission had further clarified its case and, while awaiting a response from the Czech authorities, had postponed the referral to the ECJ.

1.10   The European Parliament's Petitions Committee is due to examine a petition submitted by Spain's General Council of Official Medical Associations. The Council holds that the Spanish government's emergency COVID-19 legislation is in breach of the Directive.

1.11 The responsibility for entering relevant professions and titles into Annex V of the Directive lies with Member States. This generates some of the taxonomic difficulties which the Commission's ESCO (European Skills/Competences, qualifications and Occupations) system is designed to resolve. The same profession may go by different names in different national frameworks, while the same name may cover different professional practices. The EUHPP Joint Statement mentioned earlier (para.1.3) calls for the harmonisation, in a five-year training programme, of medical training for radiologists. It urges Member States to abandon the term "diagnostic radiologist" in favour of the simple designation "radiologist".

1.12 Two similar issues are currently concerning the Directive's Group of Coordinators. The Minutes of its November meeting report that Member States have been asked to update data relating to the term "psychologist" and, specifically...

> ◊ To illustrate clearly whether the national system has a basic psychologist with specialisations or consists of different kinds of psychologists.
>
> ◊ It is not sufficient to describe the activities of psychologists with general sentences such as "activities contributing to the mental wellbeing of people". They need to be complemented with examples of specific activities.
>
> ◊ To explain whether a psychologist is considered a health profession with access to reimbursement under the public health insurance system.
>
> ◊ To outline whether and in how far a psychologist can prescribe medicine.

Minutes from the previous meeting also indicated a lack of clarity surrounding the structure of training programmes and the relationship between academic qualifications and professional titles.

1.13 The Group's attention has also been drawn to the question of the "intensivist", i.e. medical doctors specialising in intensive care. There was concern that incompatible regulatory practices inhibited professional mobility, together with consideration of whether automatic recognition might be secured by a system involving partial access. This debate continues (but the Minutes of the Group's January and March meetings have not yet been posted).

1.14 In January we reported on the state of play in the Common Training Frameworks or Tests (CTFs). These can be developed by a minimum of nine MSs regulating a particular profession. Other MSs can then opt in. To date, the only finalised test is in the field of ski instruction. Here is an update, as accurate as we can make it, of the various initiatives still current:

Body		Website	Comment
EAHP	European Association of Hospital Pharmacists	https://www.eahp.eu/sites/default/files/annual_report_2020.pdf	See p.10 of EAHP Annual Report 2020
EBVS	European Board of Veterinary Specialisation	https://ebvs.eu/news/common-training-framework-ctf-for-ebvs-recognized-specialists-update-october-2017	No recent update
ESNO	European Specialist Nurses Organisation	https://www.esno.org/assets/files/ESNO_Education_committee_17-12-2019.pdf	Conducting a Delphi study
IFLA Europe	International Federation of Landscape Architects Region Europe	https://www.landscape-portal.org/landing-page/innoland/	In process of design

Body		Website	Comment
EAP	European Association for Psychotherapy	https://www.europsyche.org/app/uploads/2021/04/eap_submissionDocument_a4_210402_single.pdf	Formal application submitted
EDHF	European Dental Hygienists Federation	https://www.edhf.eu/projects/	In discussion with DG GROW
EUplmg	European Union of Pharmacists Specialists in Laboratory Medicine and Human Genetics	https://euplmg.eu/a-about-us-euplmg/ (website under construction)	In discussion with DG GROW
EFLM	European Federation of clinical chemistry and Laboratory Medicine	https://www.eflm.eu/site/search/common%20training%20framework (link broken)	In discussion with DG GROW

1.15   Given that CTFs were introduced when the Directive was amended in 2013, they cannot be said to have been a great success. Yet still there is interest. Clearly, a proposal takes time to develop and mature. The Commission then has to be convinced that all stakeholders have been consulted and that the proposed CTF will simplify the regulatory landscape and facilitate professional mobility. Finally, drawing up the necessary Delegated Act itself takes time. As a result, only the fittest proposals survive. How, then, might interested professions work around the difficulties? The Commission offers some suggestions in the Minutes of the November 2020 meeting of the Group of Coordinators:

> Common training frameworks are only one of several options to facilitate mobility. Establishing a common training framework might not be the panacea to professionals' mobility problem for a given profession. Alternatives to common training frameworks for improving mobility exist in the Directive, such as the partial access, introduction of specialisations via Annex V, the European Professional Card and finally an efficient use of the general system of recognition. Harmonization of curricula independently from the common training frameworks through the Bologna process can help ensuring easier academic recognition and also favour mobility.

1.16   One intended CTF has indeed opted for the "Bologna" route. The University of Malta hosts PODIATRAIN, an Erasmus+ Strategic Partnership which has evolved out of a projected CTF originating in the European Council of Podiatrists and European Network of Podiatry in Higher Education (ENPODHE). Automatic recognition of the qualification will in the first instance be limited to the project partners. A step towards a CTF – perhaps.

1.17   Architecture - We have regularly tracked the long gestation of the Mutual Recognition Agreement which the professional bodies in Canada and in the EU have sought to see incorporated into the Comprehensive Economic and Trade Agreement (CETA). In November, the Group of Coordinators learnt that the Commission had tabled a proposal based on, but not identical with, the submission agreed by Canadian Architectural Licensing Authorities (CALA) and the Architects' Council of Europe (ACE). Canada and the EU had agreed to begin negotiations in January.

1.18   In February, during the online CETA Regulatory Forum and in response to a question from EUA, the Commission commented that there had been some resistance to the proposal (it did not specify from whom). It added that, until the MRA in architecture was finally settled, no more requests would be considered. A recent report by DG Trade suggests that the EU and Canada hope to resolve all outstanding issues at a third round of negotiations due to take place this month. EUA understands that the proposed MRA will allow EU and Canadian architects to practise in the host territory, on condition that they have the appropriate qualification, four years of relevant experience, and "proof of good standing". They are also required to be familiar with the host country's regulatory framework; a short course will be designed for this purpose.

1.19   Pharmacy - The Erasmus+-funded COPHELA project led by the University of Granada is developing a Master-level MOOC: Cooperation in Quality Assurance for Pharmacy Education and Training between Europe and Latin America. Partners and associates include universities, higher education sectoral bodies and professional bodies in pharmacy on both sides of the Atlantic.

1.20   Occupational Therapy - The three active professional bodies have merged, creating Occupational Therapy Europe (O-T EUROPE). The new body is contemplating joining the umbrella stakeholder organisation Health First Europe (see para.1.3 above).

1.21   Osteopathy - Also working towards a higher and stronger European profile on the back of a merger is the European Federation and Forum for Osteopathy (EFFO). The profession is regulated in twelve of EFFO's 22 member countries. EFFO aims to reach a position where osteopathy is regulated in all European countries and is recognised as a primary healthcare profession. In support of this, it will sharpen its focus on education and training.

B. ACADEMIC RECOGNITION IN THE EUROPEAN EDUCATION AREA

2.1   Our previous briefing reported on the Commission's plans for the completion of the European Education Area by 2025. To recapitulate: the Communication brings into dual focus the prime drivers of the wider policy frame – quality, inclusion, and the green and digital transiations – addressing them in terms of skills, research and human rights. It sees the period 2020-25 as one of green and digital transition. Within this dynamic perspective, it rehearses themes familiar to the higher education sector: mobility, recognition, graduate tracking, transnational collaborative activity, joint degrees, internationlisation and capacity building in Partner Countries. There are also shifts in emphasis: a renewed stress on multilingualism, a stronger focus on gender, forward movement on environmental sustainability in education, and a drive to raise the quality of teacher education.

2.2   In February, the European Parliament's Culture and Education Committee (CULT) commissioned an internal study on Making the European Education Area a reality: state of affairs, challenges and prospects. The study indicated a need for clarification on a number of points: the EEA's geographical scope; the delimitation of EU and Member State competences; the level of stakeholder involvement; the EEA's synergies with the European Research Area (ERA) and the European Higher Education Area (EHEA). It called for a clear implementation strategy and the assertion of academic freedom as a core principle.

2.3   The involvement of discipline-specific professional bodies and accreditation agencies in the EHEA is slowly growing. The main focus is on quality assurance, as illustrated by the number of relevant full and affiliate members of the European Association for Quality Assurance in Higher Education (ENQA):

ADEE: Association for Dental Education in Europe	ENQA affiliate since 2016
AHPGS: Accreditation Agency in Health and Social Sciences	ENQA member since 2009; listed on the European Quality Assurance Register (EQAR) from the same date
CTI: Commission des Titres d'Ingénieurs	ENQA member since 2005
EAEVE: European Association for Establishments of Veterinary Education	ENQA member since 2018; listed on EQAR since 2018
ECAQA: Eurasian Centre for Acccreditation and Quality Assurance in Higher Education and Health Care	ENQA affiliate since 2017
ECCE: European Council on Chiropractic Education	ENQA affiliate since 2018

Réseau FIGURE: Engineering Education by Research Universities	ENQA affiliate since 2021
KAZSEE: Kazakhstan Association for Engineering Education	ENQA affiliate since 2021
QUACING: Agency for Quality Assurance and Accreditation of the EUR-ACE courses of study in Engineering	ENQA affiliate since 2012
RCVS: Royal College of Veterinary Surgeons	ENQA member since 2018

2.4   Quality assurance embraces not only all the trappings of course delivery, but also processes of recognition. As we have noted before, EQAR's Database of External Quality Assurance Results (DEQAR) is a valuable aid to recognition. It holds over 60,000 quality assurance reports (institutional and/or programme) volunteered by agencies on the Register. It is open to all stakeholders, including regulatory and professional bodies, academic institutions, as well as the ENIC-NARIC networks. Supporting it is the DEQAR CONNECT project – currently piloting the integration of DEQAR data into the IT systems of four ENIC-NARIC centres (France, Italy, Netherlands, Romania).

2.5   Nuffic, the Dutch NARIC, is also a partner in EUA's own SPOTlight on Recognition (SPOT) project. SPOT will re-launch the STREAM online training course for higher education admissions officers and is building an Academic Recognition Hub, a recognition resource bank.

2.6   The Bologna Follow-up Group (BFUG) launched three Thematic Peer Groups in 2018, designed to take forward issues raised by ministers at their summit meeting in Paris. The Group dealing with implementation of the Lisbon Recognition Convention completed its work with a final conference in May.

2.7   Despite terminology which might suggest parallelism or even identity (e.g. automatic recognition, substantial difference), the structures and scope of the Bologna-driven EHEA and the Directive are quite distinct. The two ventures remain separated by geo-political scope, legal competence, and purpose; they will not fuse into a single structure. For this reason, the output of the Thematic Peer Group does not reference the Directive. There are nevertheless initiatives that either do fall or may fall into both regimes – CTFs, the competence-based curricula designed by academics in the sectoral professions, and perhaps the joint degrees developed in the European Universities Initiative. These mark out an area of potential convergence and ultimately tend towards the same goal – professional mobility and labour market integration.

2.8   Recent internal re-structuring of DG Employment, Social Affairs and Inclusion (EMPL) confirms the force of the focus on the labour market. Responsibility for Europass and ESCO is to move to the "Labour Mobility, Public Employment Services, European Labour Authority" unit, while the "Skills Agenda" unit will continue to be responsible for European Digital Credentials, transparency and data transfer of learning opportunities and qualifications, as well as overall implementation of the Skills Agenda.

C. THE FALL-OUT FROM BREXIT

3.1   And it is precisely EU labour market integration that is one of the casualties of Brexit. The EU's internal pool of high-skilled labour is smaller than before; effectively, it will now compete with the UK in the international market place.

3.2   Timely, then, is the recent agreement of Council and Parliament to the Commission's proposed changes to the Blue Card scheme. These will facilitate the entry of third country professionals by lowering the salary threshold, allowing easier subsequent intra-EU mobility and permitting family reunification. Professionals in the ICT sector will enjoy an enhanced status. The adoption of a revised version of the relevant 2009 Directive will go ahead in the near future.

3.3   Our January Briefing gave details of the extent to which professional qualifications are covered by the now ratified Trade and Cooperation Agreement (TCA) between the EU and the UK. Put simply, the UK opted to decline the opportunity for regulatory alignment; it has therefore fallen out of the scope of the Directive; mobility is henceforth limited; Mutual Recognition Agreements (MRAs) remain its only way forward at EU level, leaving it with the possibility of seeking bilateral agreements with individual Member States.

3.4   In May, Parliament's Committee on the Internal Market and Consumer Affairs (IMCO) ran a public hearing in which the Council of Bars and Law Societies of Europe (CCBE) pointed to the difficulties of recognition being experienced by qualified EU lawyers working in the UK and vice versa. The TCA permits lawyers to practise on a temporary basis, but they may thereafter be required to re-qualify. The CCBE Chair called for a legal qualifications committee to be created within the TCA management structure. The CCBE is also in discussion with the Law Society of England and Wales. In the course of the IMCO hearing the Commission spokesman noted that the recognition of lawyers' qualifications is, for the UK, a major "offensive interest" (i.e. pushing hard for market access), which suggests that an agreement on reciprocal recognition will not be straightforward.

3.5   As for auditors, the Financial Times noted (May 10th, behind its firewall) that audit firms operating in the EU must be owned by EU-qualified partners. This means that UK auditors working outside such firms will go unrecognised.

3.6   Architects in the EU and UK, meanwhile, are in discussion about the replication by their professional bodies of the MRA currently going through the CETA committee procedure.

3.7   UK regulatory and professional bodies, no longer bound by the Directive, are taking the opportunity to review their basic training requirements – in the light of client needs, scientific and educational advances, market trends, together with the possibility that their particular service sector might figure in the UK's intended portfolio of trade agreements.

3.8   Although – or because – the UK remains very dependent on the recruitment of non-UK nurses, the UK's Nursing and Midwifery Council (NMC) is considering how far to depart from the training template imposed by the Directive: the length and nature of the programmes, admission requirements, and the recognition of prior learning.

3.9   Meanwhile, the UK's General Pharmaceutical Council (GPhC) has re-formulated the basic training programme for pharmacists in terms of learning outcomes, while at the same time setting the standards to be met by training providers.

3.10   Although the TCA contains the now standard MRA facility, the EU (as indicated in para.1.18 above) has temporarily closed the door to all-comers. The UK government is nevertheless turning into opportunity its failure to secure full reciprocal recognition of qualifications. It is prepared to commit to MRAs elsewhere and, in its trade policy, has set out its wish list:

Country	Professions
Australia	None specified, but strong focus on financial services, professional and business services, transport services
Japan	Accountancy and legal professions
New Zealand	Accountancy, audit, architecture, engineering and legal professions
US	Accountancy and legal professions

3.11   In the healthcare professions, where the impact of Brexit is most keenly felt, the UK has published a [Code of Practice](#) for the international recruitment of health and social care personnel in England. [Scotland](#), a devolved administration within the UK, has issued a similar Code. Both countries are covered by the [UK's new points-based immigration system](#). The Codes have no immediate effect on recognition, but nevertheless suggest future Memoranda of Understandings with countries which have not been contra-indicated by the World Health Organisation (WHO) by reason of their fragile healthcare systems. MoUs already exist with the Philippines and with India (the latter suspended during India's coronavirus crisis). Moving from MoU to MRA is a feasible option once the UK's trade negotiators succeed in persuading future trade partners to go beyond the terms of the EU deals which were rolled-over after Brexit.

3.12   The UK intends to introduce new legislation to replace the Directive. It will satisfy two criteria: growth in external trade in services, under the banner of Global Britain; reinforcement of what the UK now calls its "internal market", in order to counter secessionist feeling in Scotland, Wales and Northern Ireland. The [policy frame](#) set out by the Department of Business, Energy and Industrial Strategy (BEIS) also notes the benefits that will accrue to education exports and the recruitment of international students.

3.13   Specifically, the policy advises that:

◈   Government and devolved administrations will be able to prioritise certain professions according to labour market need;

◈   Beyond these, regulators and professional bodies will have the flexibility to determine recognition criteria and procedures;

◈   International recognition agreements will be reached on a regulator-to-regulator basis, without approval from above, always providing that they support the government's trade agenda;

◈   Compliance with GATS will be maintained, as will the commitment to mutual recognition of qualifications enshrined in the MoU linking the UK and Ireland in the Common Travel Area;

◈   The Department has set up a Recognition Arrangements team and published [guidance](#) to regulatory and professional bodies on how to facilitate the recognition of professional qualifications.

3.14   In late May, and in line with its policy, the UK government placed its [Professional Qualifications Bill](#) on the agenda of the Westminster Parliament.

◈   The Bill (i.e. draft Act) does not distinguish between sectoral professions and a General System, in the manner of the Directive. It is nevertheless underpinned by the same logic: recognition may be straightforward or it may follow the satisfaction of certain imposed conditions. The terminology of "substantial difference" and "compensation mechanisms" is not used.

◈   This is largely because the 14-page document is very general. It is in fact an umbrella instrument covering a variety of different levels of regulation: at UK level; at the level of the UK's constituent nations (England, Scotland, Wales, Northern Ireland), to which greater or lesser regulatory powers have been devolved by Westminster; and at the level of individual regulatory bodies.

◈   The Bill provides for "regulator recognition agreements", to be struck between UK regulators and peer regulators in other countries. These may be unilateral or bilateral.

◈   So general are the provisions that there is no point looking for the equivalents of the Directive's alert mechanism, professional card, partial recognition, electronic information system (the IMI), or the detailed content of Annex V. No reference, either, to Europe's credit transfer system (ECTS) or qualifications framework (EQF).

◇ The Bill provides for the setting up of an information/assistance service, but there is no mention of any monitoring authority. Whether the Bill, if enacted, will create regulatory anomalies requiring the equivalent of the EU's Proportionality Directive, limiting and streamlining new regulation according to what is deemed proportional, is not addressed. This would likely be a political consideration for the UK government, should it choose to make a quasi-federal response to an eventual referendum in favour of Scottish independence.

3.15 Meanwhile, the UK continues to conclude so-called indigenous FTAs with countries which were its trade partners when a Member State. These are generally viewed as of political rather than economic significance. A UK-Australia FTA is expected to be announced very soon, with the possibility of MRAs in the fields mentioned in para.3.10 above.

3.16 In early June, the UK finalised an agreement with the countries of the European Economic Area (EEA), not yet signed and not yet accessible in English (although a draft in Norwegian has been published by the Norwegian government). Reports suggest that it goes further than the TCA, setting the recognition of professional qualifications on the basis of a presumption of conformity, i.e. all qualifications are assumed to be comparable unless and until they are shown to be otherwise.

3.17 In response to Brexit and COVID-19, the UK has updated its International Education Strategy. By 2030 it aims to have expanded its education export business (student recruitment, language schools, EdTech) to GBP 35b per annum, as well as to have recruited an annual 600,000 international students. To attract the latter, government has relaxed previous restrictions and will allow successful Masters and doctoral students to seek work in the UK for two and three years respectively after qualifying.

3.18 The Strategy lists the UK's target countries:

◇ Immediate targets: India, Indonesia, Nigeria, Saudi Arabia, Vietnam

◇ "Other" targets: Brazil, China and Hong Kong, Europe (unspecified, but presumably the wider Europe), Mexico, Pakistan

◇ "Further" targets include ASEAN, Ghana, Kenya, Uzbekistan

3.19 Throughout, the Strategy is expressed in term of soft power and trade. Particular stress is placed on the export potential of professional bodies:

> The Department for International Trade will scope opportunities for partnership and export for UK chartered professional bodies. DIT will connect overseas demand for chartered status to UK organisations. We will ensure we effectively communicate these opportunities to the sector, and we will run trade missions specifically for chartered professional bodies. [Implementation is to begin this year, for review in 2022].

3.20 Universities UK has published a "vision" document (Recovery, Skills, Knowledge and Opportunity), which strongly endorses the 2030 international student recruitment target while pointing out that 660,000 students are already registered on UK HE programmes delivered offshore in transnational education (TNE) frameworks.

3.21 Finally, the UK Strategy commits to promoting its teacher education sector and launching a certificated International Qualified Teacher Status (iQTS), with its eye firmly on soft power and possible government procurement opportunities.

Comments and corrections are welcome:

empl@eua.eu

eua EUROPEAN
UNIVERSITY
ASSOCIATION

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.

The Association provides unique expertise in higher education and research as well as a forum for exchange of ideas and good practice among universities. The results of EUA's work are made available to members and stakeholders through conferences, seminars, websites and publications.