

Public consultation questionnaire informing the Skills Portability Initiative

Fields marked with * are mandatory.

Introduction

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.).

Take part in this survey, share your experiences and opinion, and help the EU shape this initiative.

Target audience

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. It is open to individuals aged 16 and above. We are particularly interested in hearing from **working-age people** and from **employers or recruiters** who assess and evaluate candidates' skills and qualifications, whether they were obtained within the EU or in non-EU countries. We also welcome contributions from other organisations involved in or affected by mobility and skills recognition, such as public authorities, competent authorities responsible for recognition, research institutions and civil society organisations, to ensure a broad and inclusive understanding of the challenges and opportunities for skills portability in the EU. We invite these organisations to complete this questionnaire from the perspective of their area of expertise and representation, as well as their experience as employers.

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.

For this survey, the following definitions of qualifications and skills apply:

Qualifications: Official certificates (like a university diploma or vocational certificate) provided by a competent body that prove someone has achieved learning corresponding to a given standard. A qualification can be a legal entitlement to practice a trade.

Skills: What a person can do because of their knowledge or experience (such as use software, repair machines, care for patients, etc.). Skills can be gained e.g. while working, through volunteering or while studying and training, with or without receiving a formal certificate.

Recognition of qualifications: The process by which a relevant authority (such as a public body or a higher education or training institution) formally accepts a qualification obtained in another country as equivalent /comparable to its own, for the purpose of work, study or access to a regulated profession[1].

Validation of skills: The process by which relevant authorities, such as public bodies or education institutions, identify, document, assess and certify skills that a person has, including those acquired through non-formal and informal learning (for example, while working or in a short training course)[2].

[1] https://commission.europa.eu/education/skills-and-qualifications/recognition-your-qualifications_en

[2] <https://europass.europa.eu/en/validation-non-formal-and-informal-learning>

Additional definitions are available for reference. Feel free to consult them or skip directly to the consultation below.

 Please click here to display the additional definitions

Extended glossary

Below, you will find definitions of the key terms used in this consultation. While going through the consultation, if you are unsure about the meaning of any term, please refer back to this list.

Acceptance (of qualifications or skills): The informal acknowledgement of a qualification or skill by employers, without formal legal or regulatory procedures. This is distinct from official recognition or validation procedures.

Credential: A physical or digital record of learning outcomes that confirms that an individual has achieved

specific knowledge, skills and competences following a formal, non-formal or informal learning experience. This includes diplomas, training certificates, micro-credentials, certificates of participation, or any other type of learning record[3].

Micro-credential: A physical or digital record of what a person has learnt during a short-term learning experience (for example, a short training course)[4].

Verifiable digital credential: A secure, electronic record, such as a digital version of a diploma or driving licence, that is equivalent to a paper-based / physical credential. Rather than a scanned version or PDF, a verifiable digital credential includes built-in security features that ensure authenticity and can be verified. It can be stored in a digital wallet and easily shared across systems and countries.

Regulated professions: Professions for which the law requires specific professional qualifications (e.g. a diploma, passing a special exam, professional experience) before someone is allowed to exercise them (e.g. professions in health or law)[5].

Unregulated profession: A profession for which specific qualifications (e.g. a diploma, passing a special exam, professional experience) are not a legal requirement for exercising it. However, while not required by law, employers can still set their own criteria for recruitment, including requiring specific qualifications.

European Qualifications Framework (EQF): A European framework of eight levels for classifying and describing qualifications based on learning outcomes (what a person should know, understand and/or be able to do at the end of a learning process). The EQF operates as a translation tool to make qualifications easier to understand and more comparable across countries[6].

National Qualifications Framework (NQF): An instrument to classify qualifications by level, based on learning outcomes - that is, what the holder of a certificate or diploma is expected to know, understand and be able to do. The main driver for the development of comprehensive NQFs in Europe has been the European Qualifications Framework (EQF)[7].

EU Digital Identity Wallet: A safe, reliable, and private means of digital identification that will be provided by every EU country by the end of 2026. The wallet will enable citizens and EU residents to prove their identity and securely store, share and sign important digital documents, such as educational credentials.

[3] <https://europass.europa.eu/en/european-digital-credentials>

[4] <https://education.ec.europa.eu/education-levels/higher-education/micro-credentials>

[5] https://europa.eu/youreurope/citizens/work/professional-qualifications/regulated-professions/index_en.htm; see also the definition in Article 3(1)(a) of Directive 2005/36/EU.

[6] <https://europass.europa.eu/en/european-qualifications-framework-eqf>

[7] <https://europass.europa.eu/en/european-qualifications-framework-eqf>

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☐ Business association
- ☐ Company/business
- ☐ Consumer organisation
- ☐ EU citizen

- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☒ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

*** First name**

Endrin

*** Surname**

Bitraj

*** Email (this won't be published)**

endrin@accountancyeurope.eu

*** Organisation name**

255 character(s) maximum

Accountancy Europe

*** Organisation size**

- ☐ Micro (1 to 9 employees)
- ☒ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

4713568401-18

*** Country of origin**

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

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<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
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<input type="radio"/> Bulgaria	<input type="radio"/> Heard Island and McDonald Islands	<input type="radio"/> Niue	<input type="radio"/> Togo
<input type="radio"/> Burkina Faso	<input type="radio"/> Honduras	<input type="radio"/> Norfolk Island	<input type="radio"/> Tokelau
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<input type="radio"/> Cayman Islands	<input type="radio"/> Iran	<input type="radio"/> Pakistan	<input type="radio"/> Turks and Caicos Islands
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| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Lucia | |

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ **Anonymous**

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ **Public**

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

* Which of these sectors are you related to?

- ☐ Aerospace and defence
- ☐ Agri-food
- ☐ Construction
- ☐ Cultural and creative industries
- ☐ Digital
- ☐ Electronics
- ☐ Energy-intensive industries
- ☐ Energy - renewables
- ☐ Health
- ☐ Mobility – transport – automotive
- ☐ Proximity and social economy
- ☐ Retail
- ☐ Textile

- ☐ Tourism
- ☐ Public sector
- ☐ I am not related to any specific sector
- ☒ Other (please specify)

Other (please specify):

Accountancy, audit and advisory

*To what extent are you involved in recruitment or hiring processes in your organisation?

- ☐ Directly involved (e.g. HR, management)
- ☐ Indirectly involved (e.g. providing input on candidate profiles or selection)
- ☒ Not involved
- ☐ Don't know / Not applicable

Problems/Challenges

To what extent do you consider the following challenges related to skills portability in the EU to be a problem?

	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.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Employers in other countries find it difficult to understand what skills a person has acquired through work experience.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 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.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Qualifications are rarely issued as verifiable digital credentials.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Qualifications issued as verifiable digital credentials in one country cannot be easily shared with employers or authorities in other EU countries.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Recognition processes for accessing a regulated profession in another country are often lengthy, complex and costly.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* 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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* 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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* 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

Please elaborate:

Other issues also affect how skills and qualifications are understood, recognised and valued across borders. These include significant differences in national legal, regulatory and language requirements, particularly for regulated professions such as auditors(<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32006L0043>) and in some Member States, accountants and tax advisors, where local knowledge is essential to safeguard quality and public trust.

As outlined in Accountancy Europe's analysis of access to the profession (Link to the document <https://accountancyeurope.eu/publications/how-access-to-the-european-accountancy-profession-is-regulated/>), regulation of the accountancy profession remains largely national, with sometimes substantial differences in education requirements, professional training, practical experience, examinations and oversight arrangements across Member States. Audit, accountancy, and tax professionals must possess expertise in national business and tax law, regulatory frameworks, and proficiency in the local language. Consequently, transferring qualifications between EU countries requires an aptitude test in the local language covering key areas of business and tax law. Such testing, along with local language knowledge, remains essential to ensure the quality and reliability of the services provided and must be preserved also in the future.

In addition, some concepts used in the consultation may be understood differently across professions and Member States, notably distinctions between academic qualifications, professional qualifications, skills acquired through experience, and newer concepts such as digital credentials and micro-credentials. This can make it challenging for respondents to assess certain questions in a fully consistent manner.

On "Qualifications are rarely issued as verifiable digital credentials" in the table above we choose not a problem at all as it's not on the day-to-day base problem. However, we do recognise the clear advantages of further enhancing digitalisation in this area.

* 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

Please tell us about your experience:

From an organisational perspective, Accountancy Europe has experience recruiting and working with staff from a wide range of EU and non-EU countries. While this diversity is a strength, it can require additional effort to understand and compare different education systems, professional qualifications and prior experience, particularly where national frameworks and terminology differ.

EU tools

* 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

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.

Based on consultation with Accountancy Europe members we think that several changes could enhance the portability of skills and qualifications in the single market.

Simplification, better integration and digitalisation of existing EU tools and legislation is strongly recommended. The current EU framework for professional qualifications is complex, with multiple instruments that can be difficult to navigate and understand in practice by professionals, employers, and competent authorities.

From all EU tools above only two tools were familiar to members of Accountancy Europe. Moving towards a more integrated, user-friendly and highly digitalised system, with fewer and clearer instruments anchored in well-known legislation, would significantly enhance the portability of skills and qualifications within the single market.

EU action

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.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 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.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 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.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To enhance the digitalisation and transnational sharing of qualifications in the EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* 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).	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To simplify, modernise and speed up administrative procedures for the recognition of qualifications across the EU.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* To simplify the way in which people who have acquired qualifications or skills outside the EU can get them recognised in the EU so that they can access the EU labour market.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate

We consider that EU-level action is mainly necessary to simplify and streamline existing frameworks, rather than to introduce new systems or additional requirements. We believe that clearer, more coherent and more robust processes would help workers, employers and authorities better understand and verify qualifications and skills in practice.

In this context, while clear and predictable timelines are important to provide certainty for applicants, competent authorities should be required to respond within a reasonable timeframe once a complete application has been formally acknowledged. However, EU-level action should avoid any form of automatic or default recognition resulting solely from the expiry of fixed decision periods. Recognition decisions should remain subject to a substantive assessment by the competent authorities. Quality must remain the overriding principle and should not be compromised in the interest of speed, simplification or harmonisation.

In our view, EU action should focus on reducing complexity and improving usability, while respecting national specificities and existing quality safeguards, particularly for regulated professions.

* 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

* 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

Please provide further details

Reliable tools to identify and demonstrate skills are increasingly relevant for both workers and employers, given the diversity of education pathways and professional backgrounds. As digitalisation advances, including the growing use of AI, such tools can help support trust, comparability and verification, provided they are robust and do not replace necessary professional judgement or quality safeguards.

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

Rather than introducing additional tools or rules, priority should be given to simplifying and strengthening existing EU frameworks. Stakeholders would benefit from more coherent, accessible and robust mechanisms that improve transparency and understanding of qualifications and skills, while avoiding fragmentation and unnecessary administrative burden.

The introduction of any new measures should be considered very carefully. If new measures are introduced, they should complement existing systems and enhance clarity and consistency, rather than create parallel structures.

Possible EU-level solutions

- * 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)

- * 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)

* 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

* 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)

between 1 and 3 choices

- ☒ 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)

* What type of digital tools could be most useful to improve administrative procedures for recognition applications? (Please select up to three)

between 1 and 3 choices

- ☒ 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)

Other (please specify):

Certified translation of documents in other languages

Additional comments

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

As digitalisation of qualifications and skills progresses, it is important to address risks related to fraud, misrepresentation and misuse of credentials, including those enabled by emerging technologies such as AI. Any EU-level initiative should therefore place strong emphasis on verification, data integrity, security and accountability, ensuring that digital tools enhance trust without undermining existing quality safeguards or professional judgement.

Participation in focus group

* 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

Contact

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