

ETUCE Position

on the Skills Portability Initiative

Adopted by ETUCE Committee on 28-29 April 2026

Background

The European Commission is preparing a so-called [Skills Portability Initiative](#) which was announced within the Union of Skills. It will focus on 3 actions, namely on workers' mobility and skills recognition; on recognition of qualifications of regulated professions; and on recognition of skills and qualifications of third country nationals. ETUCE informed the member organisations to respond to the consultation.

The following position paper contributes to ETUCE's work in advocating strong qualification requirements of teachers that are supported and met in the EU countries. It is based on ETUCE's extensive work on the revision of the Directive of Recognition of Professional Qualification ([2005/36/EC](#) & [2013/55/EU](#)) between 2011 and 2013 and [ETUCE position on Recognition of teachers' qualifications](#) adopted by ETUCE Committee in 2024.

Introduction

ETUCE is concerned that given that teachers are among the [most mobile regulated professions in Europe](#) (secondary school teachers being the 2nd, primary school teachers the 12th, and kindergarten teachers the 16th most mobile regulated professions in the EU), the Skills Portability Initiative initiative will have significant implications not only for the labour mobility of teachers but in general for the the whole profession, for education systems, and for qualification requirements.

ETUCE, representing 4.9 million teachers and education personnel across Europe, welcomes the intention to support fair mobility and improve recognition procedures. However, ETUCE stresses that reforming the recognition of qualifications must not weaken the teaching profession, lower qualification requirements, or undermine national responsibility for education.

General principles

1. Teaching is the foundation of quality education and it must remain a regulated profession anchored in high standards of initial teacher education, pedagogical competence, and

continuous professional development. Regulation serves to protect the students, uphold pedagogical integrity, and maintain public trust in education systems. Any reform related to skills portability of teachers must therefore operate within this framework and ensure that national qualification requirements remain the benchmark for recognition.

2. ETUCE fully supports labour-market mobility of teachers within the EU and towards the EU, when it is grounded in quality and fairness. Recognition systems should be transparent, efficient, and supportive of mobile teachers, but they must also guarantee full professional status, equal working conditions, and access to career progression opportunities in the host country. Quick and transparent recognition of teacher qualifications is essential to support those wishing to work as teachers in the EU or in another EU country, but this must never come at the expense of quality.
3. Social dialogue with education trade unions is vital to define minimum qualification requirements, support mobile teachers seeking to work in the EU or in another EU country in recognising their qualifications, and provide them training to fill any competence and skills gaps. Education trade unions must be involved in all stages of designing, implementing, and evaluating recognition reforms as teaching must remain a regulated profession with high-level requirements. Social dialogue is not an optional element but it is essential to ensuring that reforms reflect realities in schools, safeguard teachers' rights, and contribute to sustainable professional development.

Key Concerns Related to the Initiative

4. The initiative carries the risk of lowering qualification standards: the Commission's "[skills first approach](#)" may contribute to less qualifications requirements of teachers, and equating non-formal or industry-based skills with formal teacher qualifications, potentially legitimising entry routes that bypass pedagogical training. ETUCE is deeply concerned that such approaches could normalise practices already adopted in some Member States, where individuals without full pedagogical preparation or professional status are allowed to teach. Such a shift would undermine public education systems already under pressure from shortages, insufficient investment, and challenging working conditions.
5. The initiative can contribute to precariousness and unequal treatment of mobile teachers. Teachers who move across borders should be employed as fully qualified professionals in the same education sector teaching the same subjects with equal rights, salaries, and access to CPD. ETUCE opposes any model that results in partially qualified teachers, temporary employment statuses that limit professional rights, or employment contracts below standard national conditions and collective agreements.
6. Recognition processes are too fragmented and burdensome for the regulated professions. Teachers continue to experience complex, inconsistent, unclear, expensive, and lengthy recognition procedures. While simplification is needed, ETUCE insists that efficiency cannot

come at the expense of national pedagogical standards, language requirements, or subject-specific competence. Without careful design, streamlined processes could unintentionally lower standards or widen disparities across Member States.

ETUCE Requirements

We request the Commission to ensure that the Skills Portability Initiative:

1. Respects national competence in education and social dialogue: Education governance, curriculum development, and teacher qualifications are national responsibilities. Any EU initiative must respect this distribution of competences and avoid imposing harmonised solutions that disregard national competence on teacher qualifications. Legislative proposals must be developed in close cooperation with education trade unions to reflect the realities of teaching.
2. Refrains from addressing teacher shortages through encouraging labour mobility and brain-drain: The shortage of teachers must not be used as justification for enhancing teachers' labour mobility and for lowering teaching standards. Sustainable solutions lie in making the teaching profession attractive by improving working conditions, ensuring attractive salaries, reducing workload, and investing in high-quality initial teacher education and CPD, not in deregulation or brain-drain.
3. Ensures fair employment conditions: mobility must not come at the expense of teachers' rights, and mobile teachers - after granting them recognition of qualifications - should be employed as fully qualified teachers under the same conditions and salary as their peers. Mobile teachers should have access to full employment rights and equivalent salary scales, induction and mentoring programmes, and clear pathways into stable employment and career progression.
4. Maintains national qualification requirements towards the teaching profession: despite that ETUCE advocates that all teachers should have the highest level of qualifications (Master level)¹ and be paid appropriately, qualification requirements still vary within the EU. Some teachers can have lower while others have higher teaching qualification than of the host country. Recognition of initial qualifications should reflect national requirements of the host country and allow teachers to work in education sectors and subjects matching their

¹ Salaries should be linked to qualifications obtained. The principle of equal pay for equal work and work of equal value needs to apply. All teachers should have the highest level of qualifications and be paid appropriately. According to the [ETUCE policy paper Teacher Education in Europe](#), "raising the level of qualifications of teachers is arguably one of the most important means to raise the status and attractiveness of the teaching profession [...] It is the ETUCE's firm belief that in the light of the complexity of the job of teaching today, all teachers should, as a minimum, be educated to Master's level. In the context of recruiting qualified candidates into teacher education it is however also important to recognise that teacher education is important in its own right." [2022 Policy Paper Attractiveness of the Teaching Profession.pdf](#)

qualifications and experience. Recognition processes must align fully with the host country's standards for initial teacher training. ETUCE rejects any approach that would weaken these requirements or create shortcuts into the profession. The initiative must guarantee that qualification requirements are upheld in all recognition processes and avoid shortcuts that weaken pedagogical standards or lead to precarious employment.

5. Improves recognition systems and provides better support for teachers awaiting recognition: recognition of qualifications must remain transparent, fair, and based on robust quality assurance. Teachers should have effective support to accessing all information on the recognition processes of their qualifications. While waiting for recognition of qualifications, public employment services should support teachers with financial assistance and provision of trainings, including language training. Education trade unions should be involved in improving recognition processes and providing financial and professional support, including mentoring and access to continuous professional development.
6. Simplifies recognition processes for teachers from third-countries: ETUCE supports fair and transparent recognition mechanisms for teachers arriving from outside the EU. However, these procedures must ensure that non-EU teachers are fully qualified according to host-country standards and that they do not face discriminatory or downgraded employment arrangements. Public authorities should provide accessible pathways for language learning and bridging pedagogical training. The experience of recognising Ukrainian teachers under the [Temporary Protection Directive](#) demonstrates that, with strong safeguards, flexible and quality-driven solutions can be implemented without compromising standards.
7. Supports the recognition of teachers' continuous professional development, not only their initial qualifications: ETUCE requests that the initiative should not only concentrate on the recognition of formal qualifications, which provide licence to be a teacher, but also on certificates of continuous professional development. The initiative should include clear and transparent ways to recognise CPD certificates and in-service training, acknowledging the ongoing professional learning of teachers moving across borders. However, recognition of CPD must not be used as an alternative to accredited initial teacher education.
8. Ensures fair and transparent digitalization of recognition processes: Introducing reliable digital tools to support the recognition of teachers' qualifications, such as the EU Digital Identity Wallet and EQF-referenced national frameworks, can help speed up procedures and reduce administrative burdens. However, digitalisation must enhance recognition processes, not replace rights, safeguards, or human oversight.
 - Technical solutions alone cannot remove mobility barriers; they must be accompanied by robust legal guarantees, transparency, and strong social dialogue with education trade unions.

- Digital credentials can facilitate secure information sharing and make cross-border processes more efficient, but only when they are interoperable, trusted, and governed in the public interest. Current challenges include limited interoperability of EU tools, differing national interpretations of short term courses and digital badges, and the difficulty of digitalising older qualifications.
- Key principles of digitalization of recognition process should guide all EU and national initiatives, including: Public governance, not commercial control; strong data-protection and privacy safeguards; user-friendly, multilingual platforms for storing and sharing credentials, including training certificates; preventing digital divides by combining digital tools with human guidance and maintaining physical options of recognition processes.
- The EU Digital Identity Wallet could contribute to more secure recognition, provided it remains voluntary, inclusive, free for education sector workers, publicly governed, and supported by awareness campaigns and tripartite governance. Importantly, it must not replace non-digital alternatives, ensuring no worker is disadvantaged.

Challenge in creating automatic recognition tools or mechanism for the teaching profession

In considering the ongoing debate on a possible [European Professional Card](#) or the establishment of a [Common Training Framework](#) for teachers, ETUCE emphasises that any modernisation of recognition procedures must take place within a context of strong social dialogue and respect for the diversity of national education systems. ETUCE supports the Commission's intention to streamline and modernise recognition processes, and acknowledges that professional standards are, and must continue to be, developed in close cooperation with the representative professional organisations of teachers, which in most countries are the same organisations as the education trade unions. Nevertheless, significant uncertainties remain regarding whether a European Professional Card or a Common Training Framework could genuinely enable quicker or even automatic recognition across the EU without undermining national qualification requirements, pedagogical standards, and the professional status of teachers.

Although such instruments might, in theory, facilitate more consistent and transparent recognition procedures, it is not yet clear whether they would be limited to recognising professional titles or whether they could also address the more complex issue of recognising learning outcomes. Moreover, the practical challenges associated with establishing any common instrument for the teaching profession are substantial. At present, mobility within the education workforce already reveals considerable complexity: the [European Commission's Regulated Professions Database](#) lists approximately thirteen types of teachers, accompanied by varying and sometimes inconsistent explanations of national and regional qualification requirements across the EU, EEA, and EFTA countries, including the United Kingdom. Even within a single Member State, the professional titles that fall under one recognised category can differ across regions or institutional contexts. This diversity highlights why, despite goodwill and interest, it may be extremely difficult to develop a

European Professional Card under [Directive 2005/36/EC](#) for selected teaching professions, even if there were clear support among teachers' trade unions based on potential advantages such an instrument might bring.

While there are positive regional examples, such as the mutual acknowledgement of teachers' degrees among Nordic countries, made possible through long-standing cooperation and shared linguistic and pedagogical affinities, these experiences cannot simply be transposed to the broader European context. At present, a Common Training Framework for teaching professions under Directive 2005/36/EC cannot be developed in at least nine EU countries, primarily due to the linguistic diversity that characterises European education systems and the central role that language plays in teaching, curriculum delivery, and cultural context. In addition to linguistic differences, the absence of robust social dialogue at both European and national levels poses a major obstacle to the establishment of any such framework.

For these reasons, ETUCE stresses that proposals for a European Professional Card or a Common Training Framework for the various teaching professions must not proceed without thorough examination, extensive consultation with the education trade unions, and guaranteed respect for national competence in education. Any mechanism must be transparent, effective, and fully aligned with national requirements, and must not compromise the professional standards, pedagogical integrity, or cultural specificity inherent to the teaching profession in each Member State.

Conclusion

Europe's teachers are ready to engage in shaping a fair and future-proof Skills Portability Initiative. For ETUCE, real progress means improving recognition systems without compromising the professional standards that lie at the heart of quality education. The initiative must guarantee high qualification requirements, equal rights and status for all mobile teachers, and transparent, well-governed digital tools that support, rather than substitute, proper recognition procedures. To address teacher shortages and strengthen public education, the EU must invest in strong professional frameworks, uphold national competence in education, and ensure that all reforms are co-designed with the teaching profession. ETUCE stands ready to collaborate, but will firmly oppose any measure that risks deregulation, precarious employment, or diminished pedagogical quality. By placing quality, fairness, and social dialogue at its core, the Skills Portability Initiative can become a helpful instrument for both teachers and education systems, supporting mobility while safeguarding the profession that underpins Europe's democratic, social, and economic wellbeing