



Education International  
Internationale de l'Éducation  
Internacional de la Educación  
Bildungsinternationale



ETUCE – European Trade Union Committee for Education  
Education International - European Region

President  
Larry FLANAGAN

Vice-Presidents  
Odile CORDELIER  
Andreas KELLER  
Trudy KERPERIEN  
Dorte LANGE  
Branimir STRUKELJ

Treasurer  
Joan DONEGAN

European Director  
Susan FLOCKEN

ETUCE-CSEE  
Boulevard Bischoffsheim 15  
1000 Brussels | BELGIUM  
secretariat@csee-etu-ce.org  
+32 2 224 06 42

Position paper on

## Recognition of Teachers' Qualifications in the European Union in light of teacher shortages

*Adopted by the ETUCE Committee on 14-15 March 2024*

### Background

Following ETUCE's work on the [EU Directive on Recognition of Professional Qualifications](#), ETUCE participated in several public consultations of the European Commission on learning mobility and recognition of qualifications of third country nationals.

The following draft represents the outcomes of the discussions with the Education Advisory Panel as ETUCE's reactions to the European Commission's new "[Skills and Talent Mobility Package](#)", in particular its initiatives namely the [Communication on skills and talent mobility](#) and [Commission Recommendation EU 2023-7700 of 15 November 2023 on the recognition of qualifications of third-country nationals](#). The third initiative of the policy package, the Regulation establishing an EU Talent Pool is dealt with by the European Trade Union Confederation. The [Annex of the Proposal for a Regulation of the European Parliament and of the Council establishing an EU Talent Pool](#) lists up shortage professions in the EU, which is planned to be updated regularly.

According to the [Progress Report of the European Education Area](#) (Nov. 2022), one of the greatest challenges the EU is facing concerning education is teacher shortages. ETUCE's<sup>1</sup> ongoing campaign on #MakingTeachingAttractive! voices the demands of education trade unions to overcome this problem. There are shortages in the teaching profession as it is unattractive to young graduates due to many reasons, including low salaries, unfavourable working conditions, and a high level of workload and work-related stress, thus resulting in the fact that 40% of the teaching workforce is above the age of 50.

The Education Council of EU ministers in their meetings in March and May 2023 discussed the issue of teacher shortages and agreed that it is a serious risk to the quality and equity of education. They adopted the [Council resolution on The European](#)

<sup>1</sup> ETUCE represents 127 Education Trade Unions, more than 11 million teachers and their education personnel in 51 countries across Europe.

[Education Area: Looking to 2025 and beyond](#) wherein the Council agrees that it is important to enhance the teaching profession and to address teacher shortages in cooperation with the social partners by promoting professional development, mobility opportunities, working conditions and well-being of teachers as key factors in increasing the attractiveness of the profession.

The [ETUCE position on enhancing the mobility of teachers and trainers](#), adopted by the ETUCE Committee on 7-8 November 2022, underlined that learning mobility of teachers should be an important element of their professional development. However, there are many obstacles to support teachers' learning mobility, namely shortage of integrated mobility periods in curricula, the overregulation of the teaching profession, different school year structures across Member States, the lack of language competencies, family responsibilities of teachers, and difficulties in arranging adequate substitute teachers and trainers. In addition to these, the financial means and insufficiency of Erasmus grants were the main obstacles of participating on Erasmus exchange programmes in 2016, as outlined in the [Joint ETUC-ETUCE Reflection to the Proposal on the Erasmus programme 2021-27](#). This is why we regret that the [Communication on skills and talent mobility](#) still does not present real solutions concerning making appropriate funding available to reflect the real costs of participating in Erasmus mobility for teachers and trainers, and guaranteeing the transferability of salaries and other benefits, including pensions, for teachers taking part in international mobility through their continuous professional development. The involvement of the education trade unions in the decision on how to solve these problems is key.

Linking the mobility of "talents" also to work mobility raises the question how the new Commission's initiative plans to avoid the intention of brain-drain of professions to shortage jobs, e.g. teachers within the EU and from non-EU countries towards the EU. The same question applies to the other initiative, the [Commission Recommendation EU 2023-7700 of 15 November 2023 on the recognition of qualifications of third-country nationals](#) which suggests ideas to overcome the EU's labour shortages by attracting "talents", including also regulated professions, to the EU. The teaching profession is a regulated profession in all EU countries and we strongly believe that the teacher shortage first and foremost must be solved by making the profession attractive in the EU for "talents" through effective social dialogue with the education trade unions.

It is key to support access of those who would like to work as teachers in the EU to the teaching profession by quick and transparent recognition processes of their teacher qualifications. The conditions of ensuring quality of teaching lies in high qualification requirements. Reducing qualification requirements would have a detrimental impact on the quality of education which is already suffering from several problems e.g. teacher shortages, lack of public funding, and low learning and working conditions. Thus, it is critical to respect the minimum qualification requirements of the Member States to enter the teaching profession.

The "skills first" (and not "qualifications first") policy which the Commission's initiative is presenting is a problem because it reduces the importance of qualification requirements. This can permit some people with not fully recognised qualifications or non-existent qualifications into regulated professions resulting in reducing the national requirements towards certain regulated professions. This means that these people can be under precarious contracts and low pay, and sometimes the collective agreements cannot apply to them as there are not fully acknowledges professionals. Thus,

the solution presented by the European Commission to the Member States to allow non-fully qualified professions, e.g. teachers, to the profession as temporary workers and/or professional assistants is not appropriate. This suggestion, if it is practised in the Member States, will place these people at a lower status, with lower salaries and few possibilities to obtain the full qualification later on in their career and to access the profession with all the rights under existing collective agreements. This proposal also cannot solve the problems of filling in the gaps caused by the shortages in the teaching profession and of the long recognition process for qualifications of teachers from non-EU countries.

Unfortunately, some EU Member States already practise allowing non-dully qualified people, including industry professionals and non-EU nationals with missing teaching or pedagogical qualifications to the profession with lower status. It is important to respect social dialogue with the education trade unions on defining minimum qualification requirements to access the teaching professions, on supporting non-EU nationals to recognise their qualifications, and on providing non-EU nationals trainings to fill in the missing qualifications gaps.

It is important to note that unfortunately many non-EU countries do not require any qualifications to enter the teaching profession. On the other hand, it also happens that the qualification requirements for the teaching profession in certain education sectors are higher in the non-EU country than in the host country. In this latter case the recognition of the teaching qualification should reflect the host countries' national requirements and allow the teacher to enter the same sector or other education sectors according to his/her qualifications and work experience. The recognition of qualification of the teachers of non-EU countries should acknowledge the strength of the qualification and work experience and support the teachers to meet additional requirements to enter the profession of the host country. Teachers with qualifications from non-EU countries should be supported by public employment services to attend additional trainings (including on language(s) of the host country) to fit to the requirements of the EU country to enter the profession.

Rules of recognition of teachers qualifications should respect the [EU Directive on Recognition of Professional Qualifications](#). While this applies only to EU qualifications, due to the [Temporary Protection Directive](#) supporting Ukrainian refugees entering and working in the EU, many Ukrainian teachers found employment having their qualifications recognised under this Directive. The Commission's initiative now suggests that the Directive can be applicable also to recognising the qualifications of non-EU nationals in certain cases, e.g. when a profession is a shortage profession. Even though the [Annex](#) of the initiative does not identify teachers as shortage priority profession across the EU, each Member State can decide which is their priority shortage profession which can fall under the Directive, and [teachers of different education sectors](#), e.g. [in early childhood education](#), are shortage professions in many countries. Thus, the Commission's initiative can be expected to apply to the recognition of teachers' qualifications of non-EU nationals in many EU countries.

Indeed, the recognition process under the Directive can take a minimum of 3-4 months, which includes ensuring the validity of the teaching qualification by contacting the ministry of education or university of the home country, identifying the learning outcomes of the qualification in relation to the required knowledge, skills, and competences of the host country, validating professional experience and continuous professional development, identifying skills gaps, and identifying training needs. The process is not only time consuming and stressful for the applicant, but also requires cost for applying

and for meeting skills requirements by trainings, while salary replacement or unemployment benefit are not guaranteed during this period. We welcome that the Commission's initiative underlines the necessity to ensure equal treatment by asking the Member States that the cost of application for recognition of qualifications for non-EU nationals should equal the cost for EU nationals. At the same time, it should be also considered when a person comes from a disadvantaged background and cannot pay even this cost.

We welcome that the Commission is asking the Member States to establish good contacts with social partners on improving the recruitment processes and recognition of qualifications of non-EU nationals. At the same time, effective social dialogue with the education trade unions is necessary to find solutions on how to ensure fair treatment of non-EU nationals wishing to work as teachers in the EU, including supporting them with guidance and financial means to apply for recognition, with salary replacement or unemployment benefit during the recognition process until they receive full access to the profession, and with finding them an employment with fair salary and working conditions under the same conditions as professionals from the EU. Those who wish to be teachers, either coming from other professions or from other countries, need to be supported with the fair recognition of their qualifications and in accessing required teacher training in order to ensure that they have equal rights to access the profession with the same level of fair salary and working conditions as teachers already in the system.

The European Commission's initiative should encourage the Member States to extend existing bilateral or multilateral agreements to other EU or non-EU countries in mutually recognising teacher qualifications, by ensuring that standards are respected and the education trade unions are involved in the process. It is important to ensure more information about qualifications of teachers among the EU and non-EU countries, e.g. via communication among ministries and social partners. It is also crucial to guarantee transparent and trustworthy information about qualification requirements and recognition processes in the EU countries for teachers from non-EU countries, e.g. via the Europass platform. We welcome that the Commission's initiative motivates the Member States to establish cooperation with non-EU countries to understand the qualifications and qualifications' requirements of third countries and to develop comparability databases to better understand qualifications. At the same time, it is important to ensure the role of the European Commission on EU-level cooperation on qualifications and communication with other countries, with the involvement of the relevant social partners, including the education trade unions.