



FORE Position Paper on European Commission proposal amending Directive 2005/36/EC on the recognition of professional qualifications

About FORE

1. The Forum for Osteopathic Regulation in Europe seeks to enhance the protection of patients in Europe by promoting the wider recognition and regulation of osteopaths and high standards of osteopathic treatment.
2. We support the principle of free movement and call for a revised directive which guarantees patient safety as well as respecting the rights of osteopaths moving within Europe.

Language skills

3. We would still seek greater clarification for competent authorities as to what language controls are available, particularly for professions like osteopathy, working in a self-employed capacity without any supervision.

Alert system

4. We welcome the Commission's proposal to introduce a system for national competent authorities to alert each other in case a health professional benefiting from automatic recognition under the directive is prohibited. However, this must be extended to all health professions, regardless of whether they are a sectoral or general systems profession. Osteopathy, for example, does not benefit from automatic recognition. Issues concerning the fitness to practise of any health professional should be treated with the same level of urgency.

European professional card (EPC)

5. We welcome the fact the Commission's thinking on a professional card has moved to an electronic certificate, linked to the Internal Market Information (IMI) system, but further safeguards are still required.
6. Osteopathy, along with a number of other professions, has not yet been included on the IMI system. This means that many competent authorities will not be able to use this mechanism to exchange vital information about individuals' fitness to practise and ensure that the e-certificate is not fraudulent.

For this reason we urge the Commission to extend the IMI system to all healthcare professions before the introduction of the e-certificate.

7. With the introduction of an e-certificate we are concerned that the Commission's proposals to implement shorter timelines for processing recognition applications could in practice be unworkable without prior testing. We also do not support the use of the e-certificate as absolute verification of an individual's registration status. It should be used only as part of the recognition process. A more effective way to confirm the status of an individual is to provide a free up-to-date online register of those entitled to practise.

Common training frameworks

8. We support the Commission's proposal to replace common platforms with common training frameworks, in order to provide an agreed common set of knowledge, skills and competencies or a common test assessing the ability of professionals to pursue a profession. Although it is not yet clear whether this is feasible to achieve in osteopathy because of the small number of Member States regulating the profession in Europe, the European Federation of Osteopaths and FORE are working together with the European Committee for Standardisation to develop a European standard on services of osteopaths (to encompass education, training and practice standards). This initiative is working to achieve a similar aim to the common training frameworks.

Partial access

9. We fully support the derogation for health professionals from the concept of partial access to a profession. To clarify it would be helpful to get confirmation from the European Commission as to which professions would be exempt on public health and safety grounds.

Access to information

10. We agree that information should be easily accessible on the status of a profession in different Member States, which is the relevant competent authority, and what are the registration requirements and relevant documents for application. However, we do not agree that national contact points should become responsible for handling applications for recognition – this should be the responsibility of the competent authority. National contact points should instead act as a signpost to direct the migrant to the relevant authority. This would of course require clear communication channels between the competent authorities and the national contact points.
11. In terms of processing applications online, we believe that competent authorities must still be able to request additional information which may not be possible other than in hard copy form, for example passports.

Mutual evaluation by Member States

12. In response to the Commission's proposal to simplify national legal frameworks for regulated professions, we would argue that it is essential that osteopathy remains a regulated profession in order to protect standards of osteopathic care for patients across Europe. For this reason FORE is actively promoting the regulation of osteopathy.

Further information

Sarah Eldred
Secretariat
Forum for Osteopathic Regulation in Europe
c/o Osteopathy House
176 Tower Bridge Road
London SE1 3LU
www.forewards.eu
foresecretariat@osteopathy.org.uk