



Department for
Business & Trade

Recognition of professional qualifications obtained in Switzerland

Consultation on regulations to implement
the Recognition of Professional
Qualifications Agreement between the
United Kingdom and Switzerland

Closing date: 2 April 2024

21 February 2024



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Introduction

The UK and Switzerland are among the world's leading service economies, with their services sectors each representing over 70% of GDP for both economies. The recognition of professional qualifications (RPQ) is a key facilitator for professionals in these services sectors, such as architects, lawyers and auditors, to provide their services internationally.

Since the UK's departure from the EU, the UK and Switzerland have maintained an alignment of their systems for recognition of professional qualifications since December 2021 under the UK-Switzerland Citizens Rights Agreement¹. In June 2023, the UK signed an agreement with Switzerland on the Recognition of Professional Qualifications ('the Agreement')². This Agreement will bring substantial, long-term benefits to the UK and simplify the processes for UK-qualified professionals to practise in Switzerland, and vice versa.

Similar to the RPQ provisions in the UK's Free Trade Agreement (FTA) with Norway, Iceland and Liechtenstein (EEA EFTA states), the Agreement ensures that UK qualified professionals seeking to practise a regulated profession in Switzerland can access a smooth and transparent system to have their professional qualifications recognised, and vice versa. The Agreement safeguards regulators' autonomy to set and maintain standards, assess, and where required, prevent individuals who are unfit to practise the profession from doing so. The Agreement applies to [professions regulated in law](#) in the UK or part of the UK (e.g., in Scotland only).

The Agreement also contains an Annex which sets out additional legal-sector specific provisions for certain legal professionals.

The UK and Switzerland have committed to implement the measures contained in the Agreement by 1 January 2025 (the point at which the current RPQ provisions contained in the Swiss Citizens' Rights Agreement (CRA) come to an end).

This consultation is similar to the one shared in Spring 2023 on the RPQ provisions in the EEA EFTA FTA. This consultation sets out why and how the UK intends to implement these measures, by making regulations under the [Professional Qualifications Act 2022](#) which will:

- Place a duty on regulators to meet the requirements for the recognition of Swiss professional qualifications provided in the Agreement; and

¹ Part 4 Mutual Recognition of Professional Qualifications, Agreement between the UK of GB and Northern Ireland and the Swiss Confederation on Citizens' Rights following the withdrawal of the UK from the European Union and the Free Movement of Persons Agreement. <https://www.gov.uk/government/publications/swiss-citizens-rights-agreement-and-explainer>

² Agreement between the UK of GB and Northern Ireland and the Swiss Confederation on the Recognition of Professional Qualifications. <https://www.gov.uk/government/collections/uk-switzerland-recognition-of-professional-qualifications-agreement>

- Amend sector specific legislation, where necessary, to ensure regulators have the legal powers to meet these requirements.

The consultation includes a draft set of regulations on which the government would like feedback. The regulations will apply to the regulators of all professions regulated by law in the UK at a national, devolved, or local level, including those regulators operating only within a single nation, but not those subject to separate international agreements. Annex A ('additional provisions for certain legal professionals') applies to the legal services regulators who regulate advocates, barristers, and solicitors.

In this consultation, we are seeking views on:

- The government's proposed approach to implementing the provisions of the Agreement on RPQ, including the draft regulations;
- Your organisations' ability to meet the requirements provided for in the Agreement including having the right legislation in place; and
- The impact the regulations will have on your organisation.

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General Information

In the Agreement, the UK and Switzerland have committed to a framework for RPQ. It requires relevant authorities to establish or operate a regime for RPQ within their own area of competence. Relevant authorities in the UK are generally regulators of professions regulated by law by central, devolved, or local government; or non-government bodies exercising powers delegated by central, devolved, or local government.

This consultation seeks views on the proposed approach and draft regulations to implement this system for RPQ. These regulations will require relevant authorities in scope of the Agreement to recognise qualifications from Switzerland in line with the commitments made in the Agreement.

This document outlines the government's proposed approach to implementing this obligation, through making secondary legislation using [section 3 of the Professional Qualifications Act 2022](#). As the provisions are similar to those contained in the UK's Free Trade Agreement with the EEA-EFTA states, Switzerland will be added as a named country to [the Recognition of Professional Qualifications and Implementation of International Recognition Agreements \(Amendment\) Regulations 2023](#). When Switzerland is added as a specified state to these regulations, the obligations will apply to regulators in respect of applications from Swiss qualified professionals.

The government is seeking comments on:

- Which professions your organisation regulates and your overall readiness to implement the provisions on RPQ in the UK's Agreement with Switzerland;
- The proposed implementation approach;
- Whether legislative changes will be required for your organisation to comply with the Agreement by 1 January 2025 and the nature of such changes; and;
- The impact of the proposed implementation on your organisation, including the operational impact and estimated associated costs.

Consultation Details

Issued: 21 February 2024

Respond By: 2 April 2024

Enquiries to:

Regulated Professions Policy Team

Department for Business and Trade

Old Admiralty Building

London SW1A 2AY

Email: professionalqualifications@businessandtrade.gov.uk

Consultation reference: Recognition of professional qualifications obtained in Switzerland.

Audience:

The draft regulations affect the regulators of professions regulated by law in the UK. In line with the requirements of section 15 of the Professional Qualifications Act 2022, the government is seeking views of regulators most likely to be affected by these regulations and those regulators it is otherwise appropriate to consult.

Territorial extent:

This consultation applies to England, Wales, Scotland, and Northern Ireland.

Certain aspects of the policy and legal changes may impact on policy matters that are devolved in Scotland, Wales, and Northern Ireland.

The government has worked with the devolved administrations throughout the negotiation and implementation of the Agreement.

How to respond

This document includes a list of the consultation questions. Responses are to be provided online via the Qualtrics questionnaire link below. This link can be shared with others in your organisation, with any completed parts being automatically saved. Please contact us if you are unable to use the link provided or would prefer to respond in another format.

Respond online at:

https://ditresearch.eu.qualtrics.com/jfe/form/SV_eWemACBWmW5d0G2

Please contact us if you would like to discuss the consultation and seek further information before submitting your responses.

Confidentiality and Data Protection

Information you provide in response to this consultation, including personal information, may be disclosed in accordance with UK legislation (the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).

We will process your personal data in accordance with all applicable data protection laws. See the Department for Business and Trade's [Personal Information Charter](#)

When completing the consultation survey, respondents can choose whether they would prefer us to share responses anonymously or with their organisation named (any personal details will be kept confidential).

We will share a summary of all responses with the parties who have responded to the consultation. Respondents should also be aware that the summary of responses

may also be referenced publicly. If your organisation was invited to participate but did not respond to the consultation and you would like a copy of the response, please contact us by emailing professionalqualifications@businessandtrade.gov.uk.

Quality assurance

This consultation has been carried out in accordance with the government's [consultation principles](#).

If you have any complaints about the way this consultation has been conducted, please email: professionalqualifications@businessandtrade.gov.uk

The Proposals

Context

In 2022, UK services exports to Switzerland showed a positive trade surplus of £6.4 billion (exports of £15.3 billion compared to £8.9 billion imports from Switzerland). Both the UK and Switzerland have an estimated services market of over 70% GDP and the UK is Switzerland's third largest services export market, after USA and EU.³

The Agreement provides for a comprehensive system for the recognition of professional qualifications awarded in the jurisdictions of the other Party. It guarantees that UK-qualified professionals holding comparable professional qualifications can access a route to have those recognised in Switzerland, and vice versa. It safeguards the autonomy of regulators to set and maintain standards, assess against those standards and prevent a person who is not fit from practising the profession.

To provide for this system in the UK, the government is proposing to introduce legislation under the Professional Qualifications Act 2022 to require relevant authorities to recognise Swiss qualifications in line with the terms of the Agreement. Where necessary, the regulations will also provide relevant authorities with legal powers to recognise Swiss qualifications in this way by amending relevant sectoral legislation.

Existing RPQ Arrangements between the UK and Switzerland

The [Agreement between the Swiss Confederation and the United Kingdom of Great Britain and Northern Ireland on Citizens' Rights](#) (the CRA) contains provisions on RPQ, which apply to UK and Swiss nationals.⁴ The CRA protects Swiss professionals living or working in the UK who have a qualification recognised by the UK before the end of the four-year grace period from the end of the implementation period (the 'implementation period' was the period of time agreed in the UK–EU Withdrawal Agreement in which the UK was no longer be a member of the EU but continued to be subject to EU rules and remained a member of the single market and customs union). The route which the CRA sets out is only available provided that the UK and Swiss professionals started their qualification before the end of 2020. Otherwise, UK professionals are reliant on Swiss regulators having routes to recognition in place, but there is no requirement for Swiss regulators to have these routes in place, and vice versa. The CRA also includes a grace period until the end

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<https://www.ons.gov.uk/businessindustryandtrade/internationaltrade/datasets/uktradeinservicesservicetypebypartnercountrynonseasonallyadjusted>

⁴ The CRA's RPQ provisions apply to Swiss nationals and certain third country nationals with an enforceable EU right to be treated no less favourably than a national of either state, whereas the UK-Switzerland RPQ Agreement applies to professional qualifications from that country (regardless of the professional's nationality).

of 2024 for relevant qualifying nationals to obtain a recognition decision (provided that they started their qualification prior to the end of 2020).

The CRA also contains provisions to facilitate practise of the profession of lawyer, including the entitlement to register and permanently practice under home title and the entitlement to apply for requalification after three years practice under home title. On 31 December 2024, these arrangements will expire for new applications.

The Agreement between the UK and Switzerland on RPQ

The provisions of the Agreement are similar to those in Chapter 12 of the UK's Free Trade Agreement with Norway, Iceland and Liechtenstein (the EEA EFTA states). The Agreement also includes an annex (Annex A) which covers additional provisions for certain legal professionals.

The Agreement applies to professionals from the UK or Switzerland applying for recognition of their qualifications awarded by a relevant authority in the other country, regardless of nationality.

The Agreement covers "qualifications attested by evidence of formal qualifications or professional experience" required to practise a regulated profession.⁵

The Agreement includes a framework that ensures that there will be a route to recognition for Swiss professional qualifications in the UK, and vice versa and sets out that each country "shall take any general or specific measures required to fulfil its obligations under this Agreement." To implement the Agreement in UK domestic law, the UK must put in place legislation to require its relevant authorities to have the necessary procedures in place to meet the requirements in the Agreement.

UK regulators must ensure that they operate the system for RPQ set out in the Agreement for applicants with Swiss comparable professional qualifications. The regulator decides what constitutes a comparable qualification.

The Agreement provides that the relevant authority of the host jurisdiction is required to "permit access to, and pursuit of the profession to a professional who applies for recognition and who has comparable professional qualifications, unless a condition according to Article 2.4 (Conditions for Recognition) is met or a condition referred to in in Article 2.6 (Other Conditions) is not met."

Relevant authorities that regulate legal services professions are subject to the same requirements as others, as above.

⁵ Article 2.1 of the Agreement includes definitions of the terms used in the text.

Scope

All professions regulated by law in the UK or part of the UK are in scope of the Agreement, and their regulators will be required to operate the system for RPQ set out in the Agreement. This includes professions which are regulated by law at a sub-national level, for example within a devolved administration or at a local level.

Professions subject to voluntary regulation – such as those with chartered status (including engineers and accountants) – are not in scope of the Agreement. They will therefore not be within scope of the proposed regulations, except where those bodies also play a formal regulatory role for professions regulated by law.

The Agreement does not retrospectively amend pre-existing international agreements on recognition of professional qualifications to which both Parties are signatories. These professions and their regulators will be listed in the implementing Regulations.

Annex II of this consultation document sets out a list of regulators and professions that the government has identified as likely to be in scope of the proposed regulations. This list has been compiled with regard to the definitions of “regulated profession” in the Agreement and the Professional Qualifications Act 2022. The list is not exhaustive, and regulators should review the legal text of the Regulations to ensure they are clear whether their organisation is in scope of the Agreement.

For a profession to be considered in scope of the Agreement there must be a requirement in law for an individual to practise that profession to hold qualifications that are targeted towards the particular performance of the professional activities of the profession or use of the particular title. Furthermore, there must be a record of the individual having attained a particular standard rather than a simple requirement to complete a training course.

The Department of Health and Social Care is currently taking forward legislation – the Anaesthesia Associates and Physician Associates Order (AAPAO) – which will enable the General Medical Council (GMC) to introduce statutory regulation for anaesthesia associates (AAs) and physician associates (PAs). Once regulated, AAs and PAs will also fall under the agreed frameworks set out in the EEA EFTA FTA and the Agreement for recognising comparable professional qualifications.

Officials at the Department of Health and Social Care are currently working through the amendments required to the AAPAO to ensure it is compliant with the EEA EFTA and Swiss agreements and will be consulting directly with the intention of including any drafting within this legislation if possible.

Additional provisions for certain legal professionals

The relevant authorities that regulate legal services professions are subject to the same requirements as others, as above. Annex A of the Agreement then contains additional legal sector-specific provisions for certain legal professionals (advocates,

barristers and solicitors). It provides that where a legal regulator requires such a lawyer to take an aptitude test or to complete an adaptation period, the regulator must give the lawyer the choice between the two. It then sets out detail on what an adaptation period is for Swiss lawyers (i.e., generally 3 years practice of UK law under home title) and how it works (i.e., the regulator must register the Swiss lawyer to commence the adaptation period). This provides certain Swiss/UK lawyers with a unique route to recognition of their professional qualifications as between the Swiss and UK jurisdictions.

The Agreement Provisions – Requirements on Relevant Authorities

The proposed regulations make provisions to implement into domestic law the requirements on regulators to treat applications from the holders of Swiss professional qualifications in line with the terms of the Agreement. How regulators choose to put those requirements into practice is an operational decision. For some, it will be appropriate to offer a bespoke recognition route for Swiss professionals, but this will not be the case for all professions.

Below is a summary of the provisions included in the Agreement. While every attempt has been made to ensure accuracy of this summary, regulators should refer to the legal text of the Agreement when considering the implementation of its provisions and seek their own legal advice as appropriate.

The summary below should be read alongside the definitions set out in the Agreement. References to a relevant authority apply to any UK regulator in scope of the Agreement.

Article 2.1 and 2.2 – Initial Provisions

These articles set out the preliminary details of the system and includes definitions and the scope. Some of the key definitions are replicated in Annex IV of this consultation document.

Article 2.3 – Recognition of Professional Qualifications

This article sets out that, if an individual requires specific professional qualifications to practise a profession in the UK, UK relevant authorities will recognise the Swiss professional qualifications of professionals who have comparable professional qualifications for the same profession in the UK. It also provides that on recognition the relevant authorities will be required to provide the same treatment to applicants qualified in Switzerland which is no less favourable than those who gained their professional qualifications in the UK.

Article 2.4 – Conditions for Recognition

This article sets out the three conditions on which regulators can refuse to recognise professional qualifications for the same profession (regulators decide whether one of the conditions is met):

Condition	Description
1	Regulators consider there is a 'substantial difference' between the Swiss professional's qualifications and the essential knowledge or skills required to practise the profession in the UK AND the professional fails or refuses to take an aptitude test or complete an adaptation period

2	Regulators consider that the regulated profession in the UK comprises one or more professional activities that cover substantially different matters from those covered by the Swiss professional's qualifications AND the professional fails or refuses to take an aptitude test or complete an adaptation period.
3	Requiring the professional to take an aptitude test or to complete an adaptation period would amount to requiring the professional to acquire the professional qualifications required to practise the regulated profession in the UK.

Article 2.5 – Compensatory Measures

This article sets out that regulators may require a professional to undertake an aptitude test or complete an adaptation period where:

- a. there exists a substantial difference between the professional's professional qualifications and the essential knowledge or skills required to practise the regulated profession in the UK; or
- b. the regulated profession in the UK comprises one or more professional activities that cover substantially different matters from those covered by the professional's professional qualifications.

The relevant authority can decide between an adaptation period or an aptitude test.

Where compensatory measures are applied, relevant authorities should, where possible and when requested by the professional, provide reasons for requiring them in writing, and schedule aptitude tests at a reasonable frequency (at least once a year).

Article 2.6 – Other Conditions

This article sets out other conditions for the refusal of recognition. A regulator may refuse to recognise a professional qualification where access to and pursuit of a regulated profession is subject to conditions other than the possession of specific professional qualifications and the professional fails to meet those conditions. These conditions must also apply to applicants who are seeking to or have qualified in the UK.

Article 2.7 – Procedure for Applications

This article details the procedure that a regulator should follow to manage applications from professionals holding Swiss qualifications. Regulators are required to:

- a. acknowledge receipt of the professional's application within one month of receipt and inform the professional of any missing document;
- b. grant the professional adequate time to complete the requirements and procedures of the application process;
- c. deal promptly with the professional's application; and

- d. issue a decision no later than four months after the date on which the complete application was submitted.
- e. Where requiring that the professional provide evidence of professional qualifications, this evidence must be no more than is necessary to demonstrate that the professional holds comparable professional qualifications.
- f. When requiring that the professional provide evidence of how they meet conditions other than possessing professional qualifications, this evidence requested must not be more than is necessary to demonstrate that the professional satisfies those conditions.
- g. Accept copies of documents authenticated in accordance with relevant UK law in place of originals, unless original documents are required to protect the integrity of the application process.

Regulators are also required to:

- a. Work in close collaboration with relevant Swiss regulator(s) and exchange information to facilitate the processing of an application (where applicable).
- b. Where applicable and subject to any confidentiality requirements, exchange information on disciplinary action taken, criminal sanctions imposed or any other serious, specific circumstances which are likely to have consequences for practising a regulated profession and in particular with regard to health professionals carrying out activities that have patient safety implications and professionals carrying out activities in relation to the education of minors.
- c. Comply with UK data protection law when exchanging information with Switzerland's relevant authorities. This obligation extends to any other authorities working in collaboration or exchanging information extending to the two previous entries in this list.

Article 2.8 – Information

This Article sets out that the relevant authority must make available to relevant professionals information about the professional qualifications required to practise the regulated profession. This information should include any other conditions that apply to the access and pursuit of the regulated profession, the supervisory regime and the application procedure.

The relevant authority must also promptly deal with any enquiries from professionals about the professional qualifications required and any other conditions that apply to the access and pursuit of the regulated profession.

Article 2.9 – Knowledge of Languages

A relevant authority may choose to require minimum language proficiency of Swiss professionals seeking to practise a regulated profession in the UK. If regulators choose to do so, language tests must be proportionate to the requirements of the profession.

Article 2.10 – Appeals

Relevant authorities shall adopt or maintain measures granting professionals a right of appeal against:

- a. a relevant authority's decision to refuse a professional's access to and pursuit of the regulated profession; and
- b. a relevant authority's failure to make a decision about a professional's access to and pursuit of the regulated profession.

Article 2.11 – Fees

Regulators can charge fees to process applications to recognise Swiss professional qualifications. These fees must be:

1. Reasonable and proportionate to the cost of the application.
2. Transparent in relation to fee structures and made public in advance.
3. Payable by electronic means

Article 2.12 – Sector Specific Arrangements

This article provides that both Parties may establish more detailed sector specific arrangements to facilitate the recognition of professional qualifications. For the UK, any such sector specific arrangements would usually be negotiated by the relevant authority, and only where there is interest in doing so. Such arrangements may be annexed to the Agreement (where appropriate), or take the form of a mutual recognition arrangement separate to the Agreement.

Chapter 3 – Final Provisions

Chapter 3 contains the requirement to establish a Joint Committee that will, amongst other things, monitor implementation and facilitate the exchange of information. It provides for consultations on interpretation and application of the Agreement where necessary.

It also contains the date for which both parties aim for entry into force of the Agreement, 1 January 2025. The Agreement does not enter into force until the Parties have notified each other that domestic procedures are complete. This Chapter also provides for termination of the Agreement by notice in writing given to the other Party subject to prior consultation.

Annex A – Additional Provisions for Certain Legal Professionals

Article A.1 and A.2 – Definitions and Scope

The Annex covers the UK legal regulators responsible for the professions of 'Advocate', 'Barrister' or 'Solicitor'.

The Annex applies where a covered lawyer applies to a legal regulator for recognition under Chapter 2 of the Agreement.

Article A.3 – Adaptation Period for Covered Lawyers

This Article provides that if a covered lawyer is required to take an aptitude test or complete an adaptation period under Article 2.5, the legal regulator must offer the lawyer the choice between the two.

If the covered lawyer chooses to complete an adaptation period, the Article then provides detail on what an adaptation period is (i.e. generally 3 years' effective and regular practice of the law of the host jurisdiction under home title) and how it works (i.e. the regulator must register the lawyer (but can refuse subject to a right of appeal), may prevent the lawyer undertaking certain professional activities and must apply the same rules of professional conduct as apply to professionals holding the legal title of the host jurisdiction).

[Article A.4 – Covered Legal Title of the Host Jurisdiction](#)

This Article sets out that on recognition under Article 2.3, the legal regulator must permit the covered lawyer to also use the legal title for which they are responsible.

Differences between the UK-Switzerland RPQ Agreement and the EEA EFTA FTA

The Agreement is similar to Chapter 12 of the [EEA EFTA Free Trade Agreement](#) (FTA). The proposed regulations will add Switzerland as a specified state in [Schedule 1](#) of the EEA EFTA Regulations, so that the EEA EFTA Regulations will apply to applications from professionals with Swiss qualifications as well as qualifications from Norway, Liechtenstein and Iceland.

We are aware that as a result of the EEA EFTA Regulations, most regulators will now have systems in place to recognise qualifications from Norway, Iceland and Liechtenstein. Given the provisions of the EEA EFTA and Switzerland agreements are so similar, we are expecting most regulators will be able to add Swiss qualifications to these existing processes.

Despite the similarities, there are some minor differences between the two agreements. We have summarised the differences that have a substantive impact below, however we encourage you, as regulators, to review the Agreement in detail and make your own assessments of your obligations under the Agreement (and the regulations).

- **Article 2.11** only requires fees payable by electronic means. In the EEA EFTA FTA, payments are required to be made through the relevant authority's website.
- **Annex A:** The Agreement includes additional legal sector-specific provisions for certain legal professionals. These were not included in the EEA EFTA FTA.

Proposed Approach to Implementing the Agreement

Due to the similarities between the RPQ provisions of the Agreement and the EEA EFTA FTA, we are proposing a similar approach to implementation. This will involve using powers in the Professional Qualifications Act 2022 (PQ Act) to create regulations to implement the Agreement.

The Agreement provides “a regime for RPQ which relevant authorities in each Party shall apply within their own area of competence.” As such, the UK requires its relevant authorities (regulators) to operate a system to recognise qualifications obtained in Switzerland. The UK is bound by its obligations under international law to enable its relevant authorities to meet the terms of the Agreement.

The government will give effect to this obligation by using Section 3 of the Professional Qualifications Act 2022 (PQ Act). This section provides a power to allow the government or devolved administration to make regulations to implement the RPQ provisions in international agreements.

The government proposes to make a single statutory instrument to implement the Agreement’s RPQ provisions. A single set of regulations will implement the Agreement consistently across the UK and provides clarity on implementation for regulators and for professionals with Swiss qualifications. Consistent with the approach taken in the EEA EFTA Regulations and the PQ Act, the regulations will not set out a named list of regulators within scope.

The regulations will make provisions to implement the Agreement through a general system for the recognition of Swiss professional qualifications, setting out the relevant provisions which regulators must comply with. The regulations will:

- Place a duty on regulators to implement the system of RPQ provided for under the Agreement; and,
- Where they are unable to do so using existing powers, provide regulators with the necessary powers to recognise Swiss professional qualifications and operate a system which complies with the provisions of the Agreement.

These new regulations will amend the EEA EFTA Regulations so that they incorporate the obligations of the Agreement where the provisions are identical between both agreements. The regulations will add Switzerland as a specified state to the list set out in the EEA EFTA Regulations. These regulations will capture the differences between the EEA EFTA FTA and the Agreement, including the additional provisions for certain legal professionals in Annex A.

Draft Regulations

The draft regulations will require regulators within scope of the regulations to fulfil the requirements set out in the Agreement to assess and recognise professional qualifications obtained in Switzerland in line with the requirements of the Agreement. The government intends for the Regulations to be in force by 1 January 2025. An initial draft of the proposed regulations is at Annex I.

While we expect most regulators already have sufficient powers to operate the system provided for in the Agreement, we know this is not the case for all regulators. To support you to implement the Agreement, the government proposes to provide regulators with specific powers to operate the system for professionals with Swiss qualifications. Through this consultation, we are also seeking to understand whether these powers are sufficient, and whether regulators require any specific amendments to their legislation.

Questions in this consultation invite comments on the proposed implementation approach and legislative changes that may be required for you to comply with the Agreement by 1 January 2025. For professions where no further legislative changes are required, comments are invited on the proposed implementation approach. Where your organisation has identified further legislative changes in addition to what already has been included in this document, you are asked to specify such changes.

Impact on Regulators

The consultation is seeking to improve our understanding of the operational impact of the implementing regulations on regulators within scope of the regulations. It is our view that these impacts will depend on how many professionals qualified in Switzerland seek recognition in the UK and how regulators adjust their processes to fulfil the requirements in the regulations.

As regulators are required to operate routes to recognition for the holders of professional qualifications obtained in Switzerland through the CRA, we expect many regulators to have a good understanding of these qualifications and already have processes in place. In addition, the requirements are similar to those found in the EEA EFTA FTA, meaning that we do not expect it to have a significant impact on the processes operated by regulators.

For all regulators within scope, the Agreement also requires Swiss relevant authorities to work in close collaboration and to exchange information to facilitate applications where applicable. We would like to understand the impact of requests to and from Swiss authorities. You should also take into account whether receiving information from relevant authorities in Switzerland would help process applications in a more efficient and less burdensome manner.

The information in Annex III may be helpful to assess the operational impact of the proposals. In particular, we would like to understand:

- The number of applications your organisation currently processes for professional qualifications issued in Switzerland;
- The scale of the changes involved to implement the proposed legislation; and
- The costs and benefits associated with the changes in the proposed legislation.

Questions in this consultation invite comments on the proposed operational impact and estimated costs associated with implementing the Agreement.

Consultation Questions

The consultation questions are listed below. Responses are invited through the online questionnaire, for which a separate link has been provided. Respondents will be directed to relevant questions based on their status e.g., national body, local authority.

Consent

You can choose whether we can share your responses anonymously, or with your organisation named (any personal details will be kept confidential). In the latter case, you can opt for your organisation to be named across DBT, wider Government, or the public domain. Please indicate below how we can share your organisation's identity:

My organisation is happy to be named when sharing findings...

- My organisation would prefer to remain anonymous
- Across DBT only
- Across DBT and other Government departments and, where the policy is devolved, with the relevant devolved administration(s)
- Across DBT and other Government departments, the devolved administrations
- Across DBT and other Government departments, the devolved administrations and in the public domain (please note we would check you were content before publishing any findings in which your organisation could be identified)

Would you be happy to be recontacted by the Department to organise a follow-up discussion based on your responses within the next 3 months?

- Yes
- No

If yes, please provide your contact details below:

- Name:
- Organisation:
- Email address:

Initial Questions

1. Please name your organisation and briefly outline your role.

The General Osteopathic Council (GOsC) is the statutory healthcare regulator set up by The Osteopaths Act 1993 to regulate the practice of osteopathy in the four countries of the United Kingdom.

The Osteopaths Act 1993 requires us to develop and regulate the profession of osteopathy and our overarching objective is to protect the public.

Our statutory objectives are:

- a. To protect, promote and maintain the health, safety and wellbeing of the public
- b. To promote and maintain public confidence in the profession of osteopathy
- c. To promote and maintain proper professional standards and conduct for members of the profession.

We work with the public and osteopathic profession to promote patient safety by:

- registering qualified professionals
- helping patients with any concerns or complaints about an osteopath
- setting, maintaining and developing standards of osteopathic practice and conduct
- assuring the quality of osteopathic education and ensuring that osteopaths undertake continuing professional development.

By law osteopaths must be registered with the GOsC in order to practise in the UK and we keep the Register of all those permitted to practise osteopathy in the UK.

2. Is your organisation:

- a) A national regulator, covering the whole UK [National Authority Survey Section]
- b) A regulator covering one or several (but not all) of the nations of the UK [National Authority Survey Section]
- c) A Local Authority [Local Authority Survey Section]
- d) Another sub-national authority (such as a port health authority) [Local Authority Survey Section]
- e) A regulator of a profession subject to voluntary regulation where the organisation also plays a formal regulatory role for professions regulated by law.

National Authority survey

This section is about your routes or processes for the recognition of professional qualifications from Switzerland.

3. In 2023, in order to implement the RPQ provisions in the UK's FTA with Norway, Iceland and Liechtenstein, the government introduced [The Recognition of Professional Qualifications and Implementation of International Recognition Agreements \(Amendment\) Regulations 2023](#). Does your organisation have processes in place to recognise qualifications from Norway, Iceland and Liechtenstein?
- Yes
 - No
 - Not sure

4. [if answered yes to 3] You indicated that your organisation has processes in place to recognise qualifications from Norway, Iceland and Liechtenstein. As per the requirements under the UK-Switzerland RPQ Agreement (the Agreement), are you able to add Swiss qualifications to these processes?
- Yes
 - No
 - Not sure

5. [if answered No to Q4] You indicated that you would be unable to add Swiss qualifications to the processes used to implement the RPQ provisions with Norway, Iceland and Liechtenstein. Please explain why you have answered this way, including any details around new changes you anticipate making to comply with the provisions of the UK-Switzerland RPQ Agreement.

N/A

3. Which profession(s) does your organisation regulate? Please add on separate lines all professions regulated by law for which your organisation is responsible. Some examples of these are listed in Annex II of the consultation document.
[As the General Osteopathic Council, we regulate Osteopaths under the Osteopaths Act 1993.](#)

4. *You may currently have an application route or process for professionals from Switzerland (along with EU member states) under the Citizens' Rights Agreement (CRA). These will expire on 31st December 2024.*

The following section seeks to understand what existing processes you might currently have outside of the CRA.

Aside from processes/routes for recognition of professional qualifications that depend on the CRA, does your organisation currently have other processes/routes in place for applicants with qualifications from Switzerland, such as a general registration process/route open to applicants from any country?

A 'process/route' to 'recognise a professional qualification' is the process for handling applications from individuals with professional qualifications gained overseas and granting them permission to practise in the UK without requiring the individual to re-qualify in the UK or undertake mandatory training. It could be automatic or on a case-by-case basis and could include additional requirements such as aptitude tests.

- a. Yes
- b. No
- c. Not sure

Yes - The GOsC operates a route to registration for all those who trained outside the UK. Those holding Swiss qualifications must follow the international route like any applicant holding a non-UK qualification. Details of our route to registration for international applicants can be found here:

www.osteopathy.org.uk/training-and-registering/how-to-register-with-the-gosc/i-trained-outside-the-uk/

5. [If regulates more than one profession at Q3] If this differs among the professions you regulate (i.e., if you only have other processes/routes with these countries for some professions but not others), please explain below.

N/A

6. [If Q4a] Please provide details, including whether you have any plans to make changes to these processes/routes before the CRA expires in December 2024 (other than to specifically comply with the Agreement).

No, we do not have any plans to make changes to our application routes before the CRA expires.

7. [If Q4b] Do you already have any plans to introduce other processes/routes for applicants with qualifications from Switzerland (other than to specifically comply with the Agreement), before the CRA expires December 2024?

- a. Yes (please provide details)
- b. No
- c. Not sure

N/A – once the legislation is implemented, we will automatically apply the same recognition route to those holding Swiss qualifications as is applied to those holiday qualifications from Norway, Iceland and Liechtenstein.

8. This section seeks to understand whether your existing processes/routes for recognition of professional qualifications (other than those that depend on the CRA) already meet the terms of the Agreement (such as having an appeals process, allowing online payments, etc.). If they do not, we would like to understand whether you currently have the legal powers to introduce a new process/route which does.

You may wish to read the ‘The Agreement Provisions – Requirements on Relevant Authorities’ section of the consultation document.

For each of the articles of the Agreement listed below, please select which statement best describes your position for your existing processes/routes for recognition of professional qualifications (other than those that depend on the CRA, as these will expire in December 2024).

Please note that only legal services regulators who are subject to the obligations in Annex A are requested to respond to the final row, ‘Annex A’.

	Our legislative powers are sufficient to implement this part of the Agreement – and we have processes/routes that already meet the terms	Our legislative powers are sufficient to implement this part of the Agreement – but we will need to make changes to processes/routes	Our legislative powers are not sufficient to implement this part of the Agreement	Not sure
Article 2.4 – Conditions for Recognition	x			
Article 2.5 – Compensatory Measures	x			
Article 2.6 – Other conditions	N/A			
Article 2.7 – Procedure for Applicants	x			
Article 2.8 – Information	x			
Article 2.9 – Knowledge of Languages	x			
Article 2.10 – Appeals	x			
Article 2.11 – Fees	x			
Annex A – Additional provisions for certain legal professionals				

9. [If regulates more than one profession at Q3] If this differs among the professions you regulate, please explain below.

N/A

10. [If legislative powers are sufficient in relation to any article at Q8] Which of your legislative provisions (i.e., name of legislation and provision in legislation) will provide you with the powers to implement this part of the Agreement once the provisions in the CRA expire?

The Osteopaths Act was amended in December 2023 in order to implement commitments on the recognition of professional qualifications contained in the free trade agreement between Norway, Iceland and Liechtenstein. Through adding Switzerland as a named country, this will mean that the same requirements will apply to those holding Swiss qualifications. This will mean that we have sufficient legislative powers to implement the requirements of the UK-Swiss RPQ agreement.

The following table sets out the relevant parts in the Osteopaths Act and our Rules:

Articles from the UK-Swiss RPQ Agreement	Relevant provisions in the Osteopaths Act 1993
Article 2.4 – Conditions for Recognition	Section 14 of the Osteopaths Act 1993
Article 2.5 – Compensatory Measures	Section 14A of the Osteopaths Act 1993
Article 2.6 – Other conditions	N/A
Article 2.7 – Procedure for Applicants	Section 6A of the Osteopaths Act 1993
Article 2.8 – Information	Section 19A of the Osteopaths Act 1993
Article 2.9 – Knowledge of Languages	Section 3 of the Osteopaths Act 1993
Article 2.10 – Appeals	Section 29 of the Osteopaths Act 1993
Article 2.11 – Fees	Section 6 of the Osteopaths Act 1993

[If legislative powers are not sufficient in relation to any article at Q8] You have told us that your legislative powers are not sufficient to implement the article(s) below of the Agreement. We have drafted the attached regulations which intend to give regulators additional powers so that they can implement the Agreement. Please have a look at the draft regulations. Would the draft regulations be sufficient to implement the article(s) above of the Agreement?

- a) Yes
- b) No (please explain why not)
- c) Not sure

N/A

[Go to 'Implementing the Agreement' Section]

Local Authority Survey

This section covers licencing/authorisation schemes involving the recognition of professional qualifications (it will be explained in detail what we mean by this) and your ability to implement the requirements set out in the Agreement.

Please note:

- By 'professional qualification' we mean a qualification or professional experience. The professional qualification should be required to demonstrate the individual has the skills/knowledge to carry out specific activities or use a particular title. This does not include general requirements, such as having completed a first aid course, a DBS check, or holding a driving licence.
- In order to be a 'qualification' there must be a record issued by a body whose ordinary activities include the issuing of such records which demonstrates that a particular standard has been attained following a course of study or training.
- This relates to licences or authorisations, in respect of activities regulated by law and granted to individuals, rather than businesses or premises.
- This includes licences or authorisations you may have delegated responsibility for to another organisation.

12. Do you oversee licensing or authorisation schemes where permissions to carry out specific activities, or use a particular title, is granted to an individual?

This includes cases where you may have delegated this responsibility to another organisation. Please note this question relates to licenses and authorisations granted to individuals, rather than businesses or premises.

- a) Yes
- b) No [Go to End of Survey]
- c) Not sure [Go to End of Survey]

13. Please outline which licence(s) or authorisation(s) you issue to individuals which require them to have professional qualifications. Some possible examples of these are in Annex II of the consultation document.

14. For each of the licences or authorisations outlined in the previous question, please set out the basis for this requirement to have professional qualifications. Please select all that apply:

- a) Legal requirement in UK or devolved legislation (e.g., the Licencing Act, the Food Safety Act 1990 etc.)
- b) Legal requirement in Local Authority regulation (e.g., a byelaw)
- c) We require the professional qualifications under our powers, derived from legislation, to assess how we see fit.
- d) Not sure
- e) Other (please specify)

15. *In cases where an individual is required to have a professional qualification, do you have a process/route in place to recognise professional qualifications gained in Switzerland?*

A 'process/route' to 'recognise a professional qualification' is the process for handling applications from individuals with professional qualifications gained overseas, and granting them permission to practise in the UK without requiring the individual to re-qualify in the UK or undertake mandatory training. It could be automatic or on a case-by-case basis, and could include additional requirements such as aptitude tests.

- a) Yes
- b) No
- c) Not sure

16. [If Q15a] Please outline your organisation's basis for accepting professional qualifications obtained in Switzerland. Please select all that apply:

- a) Under the CRA
- b) Under other legislation (please specify)
- c) None of the above (please specify)
- d) Not sure

17. [If Q15a and oversees more than one scheme at Q13] If this differs among the licencing or authorisation schemes you oversee (i.e. if you accept professional qualifications obtained abroad for some schemes but not others), please explain below.

Some local authorities may rely on the Citizens' Rights Agreement (CRA) for their processes/routes to recognise qualifications from Switzerland. These regulations will expire in December 2024. As a result, this next section aims to understand whether you will still be able to recognise qualifications from these countries and therefore meet the terms of the Agreement.

You may wish to read the 'FTA Provisions – Requirements on Relevant Authorities' section of the consultation document.

18. For each of the articles of the Agreement listed below, please select which statement best describes your position once the CRA expires. Please think about whether you have current processes/routes to recognise qualifications from Switzerland that do not rely on the CRA and whether you would have the powers to introduce new processes/routes if this is not the case.

	Our legislative powers are sufficient to implement this part of the Agreement – and we have processes/routes already meet the terms	Our legislative powers are sufficient to implement this part of the Agreement – but we will need to make changes to processes/routes	Our legislative powers are not sufficient to implement this part of the Agreement	Not sure
Article 2.4 – Conditions for Recognition				
Article 2.5 – Compensatory Measures				
Article 2.6 - Other conditions				
Article 2.7 – Procedure for Applicants				
Article 2.8 – Information				
Article 2.9 – Knowledge of Languages				
Article 2.10 – Appeals				
Article 2.11 - Fees				

19. [If oversees more than one scheme at Q13] If this differs among the licences or authorisations you oversee, please explain below.

20. [If legislative powers are sufficient in relation to any article at Q18] Which of your legislative provisions (i.e., name of legislation and provision in legislation) will provide you with the powers to implement this part of the Agreement once the CRA expires?

21. [If legislative powers are not sufficient in relation to any article at Q18] You have told us that your legislative powers are not sufficient to implement the article(s) below of the Agreement. We have drafted the attached regulations which intend to give regulators additional powers so that they can implement the Agreement. Please have a look at the draft regulations. Would the draft regulations be sufficient to implement the article(s) below of the Agreement?

If there are no draft regulations included which are relevant for the licenses or authorisations you have been considering above, please select 'No'

- a) Yes
- b) No (please explain why not)
- c) Not sure

Implementing the Agreement

22. [If legislative powers are not sufficient OR are sufficient but require changes at Q8 and Q18] You told us that you will need to make changes to the processes/routes for recognition of professional qualifications in order to comply with the Agreement. How are you planning to make those changes?

- a) We will amend our existing processes/routes for recognition of professional qualifications from all countries. This will mean that the rights under the Agreement will then apply to holders of foreign-gained qualifications from any country
- b) We will introduce a new process/route to recognise professional qualifications solely for professionals qualified in Switzerland
- c) Other (please specify)
- d) Not sure

23. Do you have any other comments on the draft regulations?

No

Costs (to all)

The next section seeks to understand the current level of demand for recognition of professional qualifications from Switzerland.

24. In 2023, approximately how many applications for the recognition of professional qualifications did you receive from professionals qualified in Switzerland?

- a) None
- b) Between 1 and 5
- c) Between 6 and 10
- d) Between 11 and 20
- e) Between 21 and 30
- f) Between 31 and 40
- g) More than 40
- h) Not sure

25. Do you anticipate any changes in the annual number of applications from professionals qualified in Switzerland under the Agreement?

- a) We anticipate an increase in applications
- b) We don't anticipate a change
- c) We anticipate a decrease in applications
- d) Not sure

26. *In a previous question you have told us that you need to make changes to processes/routes for recognition of professional qualifications in order to meet the terms of the Agreement. The next section seeks to understand any one-off costs you expect to incur as a result of making these changes, such as staff time to develop a new process/route, training costs, or administrative costs to update information on your website.*

[If legislative powers are not sufficient OR are sufficient but require changes at Q8 and Q18] Please estimate below any one-off costs you expect to incur as a result of making these changes to processes/routes in order to meet the requirements set out in the Agreement.

	Description	When would this cost be incurred? (year)	Full Time Equivalent (FTE) hours required	Total approximate cost (£)
	Staff time to develop new processes/routes			
	Training costs			
	Costs to update information			
	Other costs			

27. The next section seeks to understand any ongoing costs (e.g. on an annual basis) you incur as a result of making changes to processes/routes in order to meet the requirements set out in the Agreement, such as from processing applications, or further regular updates to information.

We would like to understand the ongoing costs of the existing processes/routes as they currently are (so, before you make changes – if changes are needed - in order to comply with the requirements set out in the Agreement).

Please estimate below how much you currently spend annually in ongoing costs on these existing process/routes for recognition for professional qualifications.

If you have no routes/processes currently in place, please put 'N/A' / '0'.

	Description	Full Time Equivalent (FTE) hours required	Total approximate cost (£) on an annual basis
Staff time to maintain information			
Processing costs for applications			
Other costs			

28. [If legislative powers are not sufficient OR are sufficient but require changes at Q8 and Q18] Please now estimate how much additional spend (on an annual basis), if any, you will need to spend on ongoing costs to adapt or introduce new routes/processes to meet the requirements set out in the

Agreement. For example, because of the additional requirements for an appeals process.

Please note this should not include costs incurred from your current system.

	Description	Full Time Equivalent (FTE) hours required	Total approximate cost (£) on an annual basis
Staff time to maintain information			
Processing costs for applications			
Other costs			

29. *The next section seeks to understand any changes to fees you may make as a result of changes to processes/routes for professional recognition in order to meet the requirements of the Agreement and to what extent these fees will cover your costs.*

Approximately how much do you currently charge to professionals applying to seek recognition of their qualifications from Switzerland, per application, under your existing processes (other than those that depend on the CRA), if applicable. Please provide a range if this varies by country.

There are fees that applicants are required to pay when undertaking each of the four steps when applying to register with an international qualification and practice osteopathy in the UK. The fees are the same regardless of where you obtained your qualification. We are not planning to change these fees for countries where there is or will be an RPQ agreement in place.

Step One - assessment of non-UK qualification: £690

Step Two – completion of Further Evidence to Practice (this asks about an applicants practice and experience): £690

Step Three – Assessment of clinical performance: £910

Step Four – Completion of registration application forms and processing of application: £320

30. [If legislative powers are not sufficient OR are sufficient but require changes at Q8 and Q18] Do you intend to change the amount you charge per application under any new or adapted process/route (so, as a result of changes to processes/routes in order to comply with the requirements of the Agreement)? If so, please provide an estimate (£) of the new fee per application.

Please provide a range if this varies by country.

- a) Yes (please specify)
- b) No
- c) Not sure

31. [If legislative powers are not sufficient OR are sufficient but require changes at Q8 and Q18] To what extent do you think the fees you intend to charge to applicants (for the new or adapted processes/routes) covers the costs you will incur under the new regulations in the Agreement?

- a) It will make it cost neutral
- b) It will partially cover the costs
- c) Our organisation does not charge fees
- d) Not sure

32. As a result of implementing the Agreement, do you anticipate any benefits regarding implementing the draft regulations for recognising professionals qualified in Switzerland (as a result of any changes you might need to make or anything else)? If yes, please outline these below, including whether they are one-off or ongoing benefits.

It will make it easier for the portability of UK qualification for Swiss students and create certainty that UK osteopathic qualifications will have a clearer recognition process when those holding them apply to practice in Switzerland.

Final Questions (to all)

33. Do you have any comments relevant to this consultation that were not covered in the previous questions?

No

Next Steps

This consultation will be open until 4 April 2024. Once the consultation has closed, the government will analyse the responses and will share a summary with respondents.

Given the large number of professions regulated in the UK under different sectoral frameworks, we recognise that further engagement may be needed to ensure all regulators have sufficient powers to implement the Agreement. Alongside sharing this consultation, we will hold engagement sessions with regulators, responsible UK Government departments, and the devolved administrations.

As the government's proposed regulations use the powers in [section 3 of the Professional Qualifications Act 2022](#) in areas of devolved competence, under the requirements of section 17 of the Act, the government is also required to consult the devolved administrations. The government will undertake a separate consultation with the devolved administrations to meet its obligations under section 17 of the Act in April 2024. The government has engaged regularly with the devolved administrations on its proposed approach to implementing the Agreement and shared a draft of this consultation and the draft regulations with them for information.

The government is seeking to make the relevant regulations in the second half of 2024, to ensure parliamentary passage can be completed in good time.

Annex I: Draft Regulations

A copy of the draft Regulations is attached to the consultation email.

Annex II: Regulators likely to be affected by the Regulations

This Annex details the regulators and regulated professions we believe are likely to be affected by the regulations. This list has been compiled with regard to the definitions of “regulated profession” in the Agreement and the Professional Qualifications Act 2022. This list is not exhaustive and regulators not on this list may receive the consultation.

Where a local authority is currently overseeing an authorisation scheme which requires a professional qualification, in line with the definitions used in the legislation mentioned above, the Regulations will also apply.

Regulator (National or Devolved)	Profession(s) regulated
Architects Registration Board	Architect
Association of Chartered Certified Accountants	Statutory Audit (as a Qualifying Body – Financial Reporting Council has an oversight role)
Association of Costs Lawyers <i>(delegated regulatory functions to Costs Lawyer Standards Board)</i>	Costs Lawyer
Association of International Accountants	Statutory Audit (as a Qualifying Body – Financial Reporting Council has an oversight role)
Bar Standards Board	Barrister (England and Wales)
Building Engineering Services Association	F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers (as a Certification Body)

Chartered Accountants Ireland	Insolvency Practitioner (as a Qualifying Body) Statutory Audit (as a Qualifying Body Financial Reporting Council has an oversight role)
Chartered Institute of Legal Executives <i>(delegated regulatory functions to CILEx Regulation)</i>	Chartered Legal Executive CILEX Practitioner
Chartered Institute of Patent Attorneys <i>(delegated regulatory functions to The Intellectual Property Regulation Board)</i>	Patent Agent Patent Attorney
Chartered Institute of Public Finance and Accountancy	Local Public Audit (audit of local public bodies in England only) Recognised Qualifying Body (<i>Financial Reporting Council has an oversight role</i>)
Chartered Institute of Trade Mark Attorneys <i>(delegated regulatory functions to the Intellectual Property Regulation Board)</i>	Registered Trade Mark Agent Registered Trade Mark Attorney
Chartered Institute for Wastes Management	Waste Manager
CILEx Regulation	Chartered Legal Executive CILEX Practitioner Probate practitioner
City and Guilds <i>(as a Certification Body)</i>	F-Gas Handler for Air-Conditioning Systems in Motor Vehicles F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers
Civil Aviation Authority	Aerobatic Pilot, Aeromedical Examiner Air Ground Communications Service Operator

	<p>Air Traffic Controller</p> <p>Air Traffic Controller Assessor</p> <p>Air Traffic Controller Instructor</p> <p>Air Traffic Safety Electronics Personnel</p> <p>Aircraft Cabin Crew</p> <p>Certifying Staff (Continuing Airworthiness of Aircraft)</p> <p>Commercial Balloon Pilot</p> <p>Commercial Banner Towing Pilot</p> <p>Commercial Aeroplane Pilot</p> <p>Commercial Airship Pilot</p> <p>Commercial Helicopter Pilot</p> <p>Commercial Sailplane Pilot</p> <p>Flight Examiner</p> <p>Flight Information Service Officer</p> <p>Flight Instructor</p> <p>Flight Test Pilot</p> <p>Rescue and Firefighting Personnel</p>
Costs Lawyer Standards Board	Costs Lawyer
Council for Licensed Conveyancers	<p>Licensed Conveyancer</p> <p>Licensed Probate Practitioner</p>
Department for Infrastructure (Northern Ireland)	<p>Approved Driving Instructor</p> <p>Approved Motorcycle Instructor</p> <p>Professional Driver of Large Vehicles (HGV/PSV) Train Driver</p>

Department for Transport	Dangerous Goods Driver Training Dangerous Goods Safety Adviser
Department of Agriculture, Environment and Rural Affairs (Northern Ireland)	Farmers of Chicken for Meat Production Slaughterer
Department of Health (Northern Ireland)	Agricultural Analyst Food Analyst Food Examiner Public Analyst
Driver and Vehicle Agency Northern Ireland	Approved Driving Instructor Approved Motorcycle Instructor Professional Driver of Large Vehicles (HGV/PSV)
Driver and Vehicle Standards Agency	Approved Driving Instructor Certified Motorcycle Instructor Professional Driver of Large Vehicles (HGV/PSV)
EA Technology Limited <i>(as an Enforcement Authority)</i>	F-Gas Handler for Electrical Switchgear
Education Workforce Council	Further Education Teacher School Teacher Youth Support Worker Youth Worker
Environment Agency	F-Gas Handler for Air-Conditioning Systems in Motor Vehicles (as an Enforcement Authority) F-Gas Handler for Electrical Switchgear (as an Enforcement Authority) F-Gas Handler for F-Gas-Based Solvents (as an Enforcement Authority)

	<p>F-Gas Handler for Stationary Fire Protection Systems and Equipment (as an Enforcement Authority)</p> <p>F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers (as an Enforcement Authority)</p> <p>Ozone-Depleting Substances Handler (as an Enforcement Authority)</p> <p>Waste Manager</p>
Farriers Registration Council	Farrier
Financial Reporting Council¹¹	<p>Local Public Audit (audit of local public bodies in England only)</p> <p>Oversight of Recognised Qualifying Bodies</p> <p>Statutory Audit</p>
Fire Industry Association <i>(as a Certification Body)</i>	F-Gas Handler for Stationary Fire Protection Systems and Equipment
Food Standards Agency	<p>Agricultural Analyst</p> <p>Food Analyst</p> <p>Food Examiner</p> <p>Public Analyst (under the Food Safety Act and the Food Safety (Sampling and Qualifications) Regulations)</p> <p>Slaughterer</p>
Food Standards Scotland	<p>Agricultural Analyst</p> <p>Farmer of Chicken for Meat Production</p> <p>Slaughterer</p>
Fraser Technologies <i>(as a Certification Body)</i>	F-Gas Handler for F-Gas-Based Solvents

General Chiropractic Council	Chiropractor
General Dental Council	Clinical Dental Technician Dental Hygienist Dental Nurse Dental Technician Dental Therapist Dentist Orthodontic Therapist
General Medical Council	Medical Practitioner
General Optical Council	Dispensing Optician Optometrist Student Dispensing Optician Student Optometrist
General Osteopathic Council	Osteopath
General Pharmaceutical Council	Pharmacist Pharmacy Technician
General Teaching Council for Northern Ireland	Post-Primary School Teacher Primary School Teacher
General Teaching Council for Scotland	College Lecturer School Teacher
Health and Care Professions Council	Arts Therapist Biomedical Scientist Chiropodist Clinical Scientist

	<p>Dietitian</p> <p>Hearing Aid Dispenser</p> <p>Occupational Therapist</p> <p>Operating Department Practitioner</p> <p>Orthoptist</p> <p>Paramedic</p> <p>Physiotherapist</p> <p>Practitioner Psychologist</p> <p>Prosthetist</p> <p>Radiographer</p> <p>Speech and Language Therapist</p>
Health and Safety Executive	<p>Appointed Doctor (under the Ionising Radiation Regulations 2017)</p> <p>Approved Medical Examiner of Divers</p> <p>Offshore Medic</p> <p>Professional Diver</p> <p>Radiation Protection Adviser</p> <p>Registered Building Inspector (N.B. This profession will not be regulated by HSE until April 2024, after which the requirement to register with HSE comes into force under the provisions of the Building Safety Act 2022.)</p> <p>Registered Gas Engineer</p>
Health and Safety Executive for Northern Ireland	<p>Dangerous Goods Safety Advisor</p> <p>Appointed Doctor (under the Ionising Radiation Regulations 2017)</p> <p>Approved Medical Examiner of Divers</p> <p>Offshore Medic</p> <p>Professional Diver</p>

	<p>Radiation Protection Adviser</p> <p>Registered Gas Engineer</p>
Insolvency Practitioners Association	Insolvency Practitioner (as a Qualifying Body)
Institute of Chartered Accountants in England and Wales	<p>Administration of Oaths</p> <p>Insolvency Practitioner (as a Qualifying Body)</p> <p>Local Public Audit (as a Qualifying Body) (audit of local public bodies in England only)</p> <p>Recognised Qualifying Body (Financial Reporting Council has an oversight role)</p> <p>Probate Practitioner (non-contentious probate)</p> <p>Statutory Audit (as a Qualifying Body)</p>
Institute of Chartered Accountants of Scotland	<p>Insolvency Practitioner (as a Qualifying Body)</p> <p>Probate Practitioner (non-contentious probate)</p> <p>Statutory Audit (as a Qualifying Body - Financial Reporting Council has an oversight role)</p>
Institute of the Motor Industry (as a Certification Body)	F-Gas Handler for Air-Conditioning Systems in Motor Vehicles
Intellectual Property Regulation Board	<p>Patent Attorney</p> <p>Registered Trade Mark Attorney</p>
Law Society of Northern Ireland	<p>Solicitors (Northern Ireland)</p> <p>Insolvency Practitioner (as a Qualifying Body)</p>
LCL Awards (as a Certification Body)	F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers
Lucy Electric Ltd (as a Certification Body)	F-Gas Handler for Electrical Switchgear

Maritime and Coastguard Agency	<p>Able Seafarer Deck Certificate and Able Seafarer Engine</p> <p>Boat Master Licences</p> <p>Deck Officer</p> <p>Management Level and Deck Officer</p> <p>Operational Level</p> <p>Deck Skipper of a Fishing Vessel and Engineer Officer of a Fishing Vessel</p> <p>Electro-Technical Officer</p> <p>Engineer Officer</p> <p>Management Level</p> <p>and Engineer Officer</p> <p>Operational Level</p> <p>Maritime Labour Convention Ships Cook</p> <p>Rating Deck</p> <p>Engine Room Rating</p> <p>Electro-tech Rating</p> <p>Vessel Traffic Services Operator</p>
Master of the Faculties	<p>Notary Public</p>
National Grid Electricity Transmission plc (as a Certification Body)	<p>F-Gas Handler for Electrical Switchgear</p>
Natural Resources Wales (as an Enforcement Authority for the F-Gas Professions)	<p>F-Gas Handler for Air-Conditioning Systems in Motor Vehicles</p> <p>F-Gas Handler for Electrical Switchgear</p> <p>F-Gas Handler for F-Gas-Based Solvents</p> <p>F-Gas Handler for Stationary Fire Protection Systems and Equipment</p>

	<p>F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers</p> <p>Ozone-Depleting Substances Handler Waste Manager</p>
Northern Ireland Electricity plc (as a Certification Body)	F-Gas Handler for Electrical Switchgear
Northern Ireland Environment Agency (as an Enforcement Authority)	<p>F-Gas Handler for Air-Conditioning Systems in Motor Vehicles</p> <p>F-Gas Handler for Electrical Switchgear</p> <p>F-Gas Handler for F-Gas-Based Solvents</p> <p>F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers</p>
Northern Ireland Social Care Council	<p>Adoption Service Manager</p> <p>Adult Care Home Manager</p> <p>Adult Care Home Worker</p> <p>Day Care Manager</p> <p>Day Care Worker</p> <p>Domiciliary Care Manager</p> <p>Domiciliary Care Worker</p> <p>Residential Child Care Manager</p> <p>Residential Child Care Worker</p> <p>Residential Family Centre Manager</p> <p>Residential Family Centre Worker</p> <p>Social Work Student</p> <p>Social Worker</p>
Office for Rail and Road	Train Driver

Pharmaceutical Society of Northern Ireland	Pharmaceutical Chemist
Royal College of Veterinary Surgeons	Registered Veterinary Nurse Veterinary Surgeon
Scottish Environment Protection Agency <i>(as an Enforcement Authority)</i>	F-Gas Handler for Air-Conditioning Systems in Motor Vehicles = F-Gas Handler for Electrical Switchgear F-Gas Handler for F-Gas-Based Solvents F-Gas Handler for Stationary Fire Protection Systems and Equipment F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers Ozone-Depleting Substances Handler
Scottish Ministers	Agricultural Analyst Food Analyst Food Examiner Public Analyst (under the Food Safety Act and the Food Safety (Sampling and Qualifications) Regulations) Slaughterer
Scottish Social Services Council	Care Inspectorate Authorised Officer Manager in Adult Day Care Services Social Work Student Social Worker Worker in a Care at Home Service Worker in a Residential School Care Accommodation Worker in Care Home Services for Adults Worker in Day Care of Children Services

	Worker in Residential Child Care Services
Secretary of State for Education	<p>Level 2 Early Years Practitioner</p> <p>Level 3 Early Years Educator</p> <p>School Teacher (<i>delegated regulatory functions to the Teaching Regulation Agency</i>)</p>
Secretary of State for the Environment, Food and Rural Affairs (<i>appropriate authority for F-Gas professions</i>)	<p>Farmer of Chicken for Meat Production</p> <p>F-Gas Handler for Air-Conditioning Systems in Motor Vehicles</p> <p>F-Gas Handler for Electrical Switchgear</p> <p>F-Gas Handler for F-Gas-Based Solvents</p> <p>F-Gas Handler for Stationary Fire Protection Systems and Equipment</p> <p>F-Gas Handler for Stationary Refrigeration, Air-Conditioning and Heat Pump Equipment and Refrigerated Trucks and Trailers</p> <p>Ozone-Depleting Substances Handler</p> <p>Professional Driver and Attendant Engaged in the Transport of Livestock, Equines and Poultry</p> <p>Slaughterer</p>
Secretary of State for Health and Social Care	<p>Agricultural Analyst</p> <p>Food Analyst</p> <p>Food Examiner</p> <p>Public Analyst (under the Food Safety Act and the Food Safety (Sampling and Qualifications) Regulations)</p>
Security Industry Authority	<p>Cash and Valuables in Transit Operative</p> <p>Close Protection Operative</p> <p>Door Supervisor</p>

	Public Surveillance Operative Security Guard Vehicle Immobiliser (Northern Ireland only)
Skills and Education Group Awards (as a Certification Body)	F-Gas Handler for Air-Conditioning Systems in Motor Vehicles
Social Care Wales	Adoption Service Manager Adult Care Home Manager Adult Care Home Worker Adult Placement Manager Advocacy Manager Domiciliary Care Manager Domiciliary Care Worker Fostering Service Manager Residential Child Care Manager Residential Child Care Worker Residential Family Centre Manager Residential Family Centre Worker Social Work Student Social Worker
Social Work England	Social Worker
Solicitors Regulation Authority	Solicitor (England and Wales)
Street Works Qualifications Register	Road/Street Works Operative Road/Street Works Supervisor

Teaching Regulation Agency on behalf of the Secretary of State for Education (England only)	School Teacher
The Faculty of Advocates	Advocate
The General Council of the Bar (<i>delegated regulatory functions to the Bar Standards Board</i>)	Barrister
The General Council of the Bar of Northern Ireland	Barrister (Northern Ireland)
The Insolvency Practitioners Association	Insolvency Practitioner
The Law Society of England and Wales (<i>delegated regulatory functions to the Solicitors Regulation Authority</i>)	Solicitor
The Law Society of Scotland	Conveyancing Practitioner Executry Practitioner Notary Public Solicitor (Scotland)
The Nursing and Midwifery Council	Midwife Nursing Associate Registered Nurse
Traffic Commissioners for Great Britain	Transport Manager
Trinity House	Maritime Pilot
Welsh Ministers	Agricultural Analyst Farmer of Chicken for Meat Production Food Analyst

	Food Examiner Public Analyst (under the Food Safety Act and the Food Safety (Sampling and Qualifications) Regulations) Slaughterer
Western Power Distribution plc <i>(as a Certification Body)</i>	F-Gas Handler for Electrical Switchgear

Annex III: Comparison of the CRA and the UK-Swiss RPQ Agreement

This section will provide some further information on the current arrangements for UK professionals seeking recognition of their professional qualifications in Switzerland and vice versa.

The UK implemented the Mutual Recognition of Professional Qualifications (MRPQ) provisions in the UK-Switzerland Citizen's Rights Agreement (CRA) through domestic legislation in 2020. Legislation was made by several government departments and includes the Recognition of Professional Qualifications (Amendment etc.) (EU Exit) Regulations 2019. These Regulations implement the relevant RPQ provisions in the CRA and came into force immediately following the end of the Transition Period.

This route is only available provided that the professionals started their qualification before the end of 2020. Otherwise, professionals are reliant on Swiss regulators having routes to recognition in place, but there is no requirement for Swiss regulators to have these routes in place. The CRA also includes a grace period until the end of 2024 for relevant qualifying nationals to obtain a recognition decision (provided that they started their qualification prior to the end of 2020). UK nationals wishing to work in Switzerland who are not covered by the CRA will face a cliff edge of no preferential recognition routes and potential market access loss unless a new arrangement with Switzerland is in place.

This new and separate RPQ Agreement was agreed to help mitigate any cliff edge that is associated with the CRA, as the CRA expires on 31 December 2024. The provisions in the Agreement are intended to come into force on 1 January 2025 to allow for a smooth transition for professionals in Switzerland and the UK.

The Agreement covers all professions regulated by law. The definition-based approach provides more flexibility than the CRA and can be better adapted to changes in the area of regulated professions. The Agreement also safeguards regulator autonomy and ensures that regulators set their own standards and to decide whether a professional holds the qualifications required to practise in that profession.

The Agreement requires relevant authorities (regulators), to provide a **route to recognition for professions regulated in law** and includes:

- Conditions which entitle a regulator to refuse to recognise comparable qualifications.
- Allowance for refusals and compensatory measures.
- Procedural requirements, including that regulators respond within 4 months of receiving a full application, requirements to provide information to applicants, knowledge of language requirements allowed, appeals and fees.

Another key difference between the current arrangements and the new arrangements is that the Agreement will be applicable to holders of UK and Swiss qualifications, and not only nationals of the Parties. This ensures that professionals have predictable routes to recognition, regardless of their nationality and reduces the burden on professionals.

The Agreement also allows for UK regulators to negotiate and sign separate mutual recognition agreements or have other arrangements with Swiss regulators to have a more automatic/streamlined system for recognition.

The CRA also extended specific entitlements for UK and Swiss lawyers. It was implemented in England and Wales and Northern Ireland by the Services of Lawyers and Lawyer's Practice (Revocation etc.) (EU Exit) Regulations 2020. The terms of Annex A are based on the entitlement to apply for requalification after three years practice under home title that currently exists on a temporary basis for certain Swiss lawyers registered before 31 December 2024. However, Annex A does not replicate all of the ongoing rights and systems under the CRA. For example, the entitlement to register and permanently practice under home title has not been extended in the Agreement and regulators have greater autonomy over the process to admit lawyers through the adaptation period.

Annex IV: Glossary

Term	Definition
The Agreement	Agreement between the United Kingdom of Great Britain and Northern Ireland and the Swiss Confederation on Recognition of Professional Qualifications
The Act	The Professional Qualifications Act 2022
Adaptation Period	Defined in the Agreement as ‘period of supervised practice, subject to an assessment and possibly accompanied by further education or training, of a regulated profession in the host jurisdiction under the responsibility of a qualified member of that profession’
Aptitude Test	Defined in the Agreement as ‘a test limited to the professional knowledge of professionals, made by the relevant authorities of the host jurisdiction with the aim of assessing the ability of the professional to pursue a regulated profession in that jurisdiction’
Compensatory Measures	An adaptation period or an aptitude test
EEA EFTA states	Collectively, Norway, Iceland, and Liechtenstein
EFTA	European Free Trade Association
FTA	Free Trade Agreement
Home Jurisdiction	The jurisdiction of the party in which the professional qualifications were obtained
Host Jurisdiction	The jurisdiction of the party in which a professional wants to access and pursue a regulated profession
Measure	Defined in the Agreement as ‘measure by a Party, whether in the form of a law, regulation, rule, procedure, decision, administrative action, requirement, practice or in any other form, and for greater certainty, includes a failure to act’

Measure of a party	<p>Defined in the Agreement as ‘measures adopted or maintained by:</p> <p>(i) central, regional, or local governments or authorities; and</p> <p>(ii) non-governmental bodies in the exercise of powers delegated by central, regional or local governments or authorities’</p>
Parties	The United Kingdom of Great Britain and Northern Ireland and the Swiss Confederation
Professional Qualification	Defined in the Agreement as ‘qualifications attested by evidence of formal qualifications or professional experience’
Regulated Profession	A profession which is regulated by law in the United Kingdom or Switzerland
Relevant Authority	Defined in the Agreement as ‘an authority or body, competent to recognise qualifications and authorise the practice of a regulated profession in a jurisdiction’
Route to Recognition	A process that allows for the recognition of professional qualifications obtained outside the UK without having to fully re-qualify