

*From the Office of the President  
Professor Andy Adam FRCP FRCS PRCR*

16 March 2009

European Commission  
B-1049  
Brussels  
Belgium

Dear Sir

**Re: Green Paper on the European Workforce for Health**

The Royal College of Radiologists (RCR) is pleased to comment on the above paper and would broadly agree with its contents.

We would like to make three specific comments, as follows:

1. Managing Mobility of Health Workers within the EU (section 4.4)

The Green Paper notes that Directive 2005/36/EC on the recognition of professional qualifications has introduced a requirement for competent authorities of the host and home Member States to exchange information regarding disciplinary action or criminal sanctions taken or any other serious, specific circumstances.

However, on accessing the Healthcare Professionals Crossing Borders [HPCB] website [www.hpcb.eu](http://www.hpcb.eu) on 16 March 2009, the following Member States are not listed as HPCB participants: Austria, Bulgaria, Greece, Latvia, Lithuania, Luxembourg, Poland, Romania and Slovakia.

Moreover, even those Member States who are participants in HPCB, in some instances only participate in respect of some healthcare professionals but not all and the Healthcare Professionals Crossing Borders is merely an “informal” and “voluntary” collaboration.

Four years after the 2005 *Edinburgh Agreement*, and its successor the 2007 *Portugal Agreement*, the European Commission needs to apply the following measures:

- Regulators of healthcare professionals across the E.U. should proactively and automatically notify the competent authorities of the other E.U. Member States when there is a restriction on the licence to practise of an individual practitioner.
- When a healthcare professional seeks to provide care for patients in another E.U. Member State, the competent authority should issue a European Certificate of Current Professional Status detailing the nature of registration held, e.g. full, temporary, restricted, suspended.

## 2. The Impact of New Technology: Improving the Efficiency of the Health Workforce (Section 5)

The four action points listed are to ensure suitable training of health professionals, to encourage the use of new IT, to ensure interoperability and to ensure better distribution of new technology throughout the E.U.

The European Commission needs to seriously address effective regulation of telemedicine practitioners to assure the safety of patients in the European Union. Moreover, many of these telemedicine practitioners are physically outside the European Union.

## 3. RCR's Workforce Census

The RCR carried out a workforce census for the first time in 2008. The data is currently being analysed and we hope to publish the results by the end of April 2009. This data should give us a much clearer picture of the composition of the UK workforce in Clinical Oncology and Clinical Radiology, which in turn should help inform many of the issues raised in the Green Paper. We would be happy to share this data with you once it has been published.

I hope these comments are of use.

With kind regards,

Yours faithfully

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