ICAEW
REPRESENTATION 77/26

CALL FOR INPUT ON DEEPENING THE UK'S TRADE RELATIONSHIPS WITH INDONESIA, THE PHILIPPINES, THE UNITED ARAB EMIRATES AND URUGUAY

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ICAEW welcomes the opportunity to comment on the call for input on Deepening the UK's trade relationships with Indonesia, the Philippines, the United Arab Emirates and Uruguay, published by Department for Business and Trade on 14 July 2026, a copy of which is available from this link.

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KEY POINTS

1. ICAEW's response focuses on the UAE, reflecting the experience and insight of members operating in that market. However, ICAEW's global membership and presence across 147 countries means we also bring a wider international perspective on professional-services, regulatory and mobility issues.

2. Member feedback on the UAE is broadly positive. The market is seen as open, commercially attractive and business-friendly, with no significant general barriers to entry identified. The main issues raised are practical and regulatory, including the distinction between commercial recognition and formal licensing, duplication between regulatory authorities, and the complexity of professional mobility arrangements.

3. We suggest that the UK Government should focus on the practical implementation of professional-services commitments. Priority should be given to mutual recognition of qualifications, streamlined registration and licensing, clearer mobility routes for qualified professionals, and stronger coordination between UK and UAE regulators and professional bodies. A single digital professional-services credential or registration gateway could help reduce duplication and make processes more predictable.

4. Although the UK-GCC Free Trade Agreement has been concluded, it has not yet entered into force. ICAEW's comments therefore focus on the practical arrangements needed to support effective implementation once the agreement becomes operational, rather than implying that its provisions are already in effect.

ANSWERS TO SPECIFIC QUESTIONS

Question 1: What issues should the Government consider?

5. Member feedback suggests that the UAE is generally an open and attractive market for UK businesses and professional-services firms. The issues raised are primarily practical and regulatory, rather than broad market-access barriers. The issues identified can be grouped into the following:

   - **Recognition and licensing of professional qualifications.** Recognition of UK professional qualifications and relevant professional experience, particularly in accountancy and audit, while distinguishing commercial recognition from formal authorisation to undertake regulated work or sign statutory audit reports.
   - **Regulatory coordination and duplication.** Greater coordination between federal, Emirate-level, mainland, free-zone and specialised financial-services regulators, together with reduced duplication in licensing, registration and approval processes.
   - **Professional mobility.** Clearer arrangements for short-term assignments, secondments, intra-company transfers, contractual service suppliers and independent professionals, including better coordination between immigration, employment authorisation and professional licensing processes.
   - **Support for SMEs and mid-tier firms.** Practical measures to help smaller and mid-tier UK professional-services firms operate efficiently across different UAE jurisdictions, recognising that they may be less able than large multinational firms to absorb repeated regulatory and administrative costs.
   - **Implementation of UK-GCC professional-services commitments.** Effective implementation of commitments on professional services and recognition of qualifications, with a focus on clear, usable routes for qualified professionals and firms once the agreement is in force.

6. A useful practical step would be to create a single digital credential or registration gateway for professional services. This would allow UK-qualified professionals to submit verified

qualifications, experience records, certificates of good standing, insurance details and relevant compliance information once, with UAE regulators able to access or request that information where appropriate. This would preserve legitimate local regulatory requirements while reducing duplication and improving predictability.

Question 2: Why should these issues be considered?

7. Although the feedback gathered from members does not provide a representative picture of the experiences of all firms operating in the UAE, the barriers identified are likely to be particularly relevant to SMEs and mid-tier firms, which generally have fewer resources than large multinational firms to navigate duplicative licensing, registration and compliance requirements.

8. Overall, member feedback suggests that the UAE is viewed positively by UK-qualified professionals as an open, commercially attractive and business-friendly market. Members did not identify significant barriers to market entry. Instead, the feedback points to a number of operational and licensing-related challenges, particularly around the distinction between commercial recognition and formal licensing, overlapping regulatory requirements, and the complexity of professional mobility arrangements.

One member stated:

"We have not experienced any barriers trading in the UAE."

9. This suggests that policy efforts should focus on improving the consistency, predictability and efficiency of regulatory and licensing processes in regulated sectors, rather than addressing broad market-access restrictions. Reducing unnecessary administrative complexity could help facilitate professional mobility and enable firms, particularly SMEs and mid-tier firms, to access opportunities in the UAE market more easily.

10. Commercial recognition of UK qualifications does not always result in automatic regulatory recognition or eligibility to undertake regulated activities. While UK qualifications are generally well recognised and valued in the UAE, professionals may still need to satisfy administrative and regulatory requirements to have their qualifications formally recognised before carrying out certain regulated activities.

11. In the audit sector, internationally qualified professionals may also need to meet additional local examination, licensing, experience and continuing professional education requirements before obtaining or maintaining the necessary authorisations.

12. Professional services firms may need to engage with multiple regulatory and licensing authorities, depending on the Emirate, free zone, financial centre and nature of the work being undertaken. Divergent and overlapping requirements can increase administrative burdens, raise compliance costs and create uncertainty for businesses and professionals seeking to operate across jurisdictions. Together, these requirements can create friction for labour mobility and market access, potentially discouraging qualified professionals and firms from expanding their activities across jurisdictions.

13. While the UK-GCC Free Trade Agreement has been concluded, it has not yet entered into force. ICAEW's comments therefore focus on the practical considerations that should inform implementation once the agreement becomes operational. Member feedback suggests that reducing unnecessary duplication, improving transparency and creating clearer pathways for professional recognition and licensing will be important to ensuring that the agreement delivers meaningful benefits in practice.

Question 3: What supporting evidence or direct feedback can be provided?

14. ICAEW received feedback from UAE-based and regionally experienced members. The members who provided feedback included audit and accountancy practitioners, professional-services and managing-partner perspectives, senior finance and executive leadership experience, and experience in the healthcare and financial-services sectors. The feedback therefore includes perspectives from both practice and business. It should be treated as qualitative input rather than a representative survey of ICAEW members or UAE-based businesses.

15. The feedback suggests that UK qualifications, including the ICAEW ACA and FCA, are highly regarded commercially in the UAE, but that this does not necessarily provide an automatic route to regulated practice.

16. One member summarised the specific issue affecting audit professionals as follows:

> *"The principal issue affecting UK-qualified audit professionals in the UAE is local licensing."*

The member also noted:

> *"While the ICAEW qualification is well regarded, it is not, in itself, sufficient for the purposes of obtaining a licence to sign audit reports."*

17. One member reported that UK-qualified audit professionals may be required to complete local law and tax examinations and meet Ministry of Economy continuing professional education requirements before obtaining or maintaining the relevant licence. The member considered that these requirements create duplication and limit the practical portability of UK qualifications and experience.

18. ICAEW supports mutual recognition of professional qualifications (MRPQ) and the portability of professional qualifications as ways to reduce barriers to trade in services, support labour mobility and help UK firms access international markets. In the UAE context, this could provide a basis for recognising internationally demonstrated professional competence while retaining proportionate requirements covering UAE-specific law, tax, audit regulation and anti-money laundering and counter-terrorist financing requirements.

19. Other members highlighted the complexity of navigating different federal, Emirate-level, mainland, free-zone and financial-centre requirements. Suggested improvements included greater reliance on assessments already carried out by an appropriate UAE regulator, stronger cooperation between UK and UAE professional bodies and regulators, and a more streamlined digital registration or credentialing process.

20. Additional feedback from a member with experience in the healthcare and financial-services sectors was broadly positive about the ability of UK professionals, including accountants, engineers and doctors, to work in the UAE. The member nevertheless suggested that formal equivalence and streamlined accreditation arrangements could further improve professional mobility and licensing.

21. Some members also identified wider opportunities for UK-UAE cooperation in financial services, artificial intelligence, healthtech, life sciences, sustainability and energy transition. These should be treated as forward-looking areas for collaboration rather than evidence of specific current barriers.

22. The feedback was generally positive about the UAE's wider business environment. One member reported experiencing no significant barriers to trading in the UAE and described the country as business-friendly. ICAEW's recommendations focus on improving the consistency, transparency and efficiency of professional-services regulation, helping qualified professionals and firms to operate more easily across jurisdictions.