

LABOUR-INT III:

- ▶ REPORT ON THE RECOGNITION OF REGULATED AND NON-REGULATED QUALIFICATIONS OF THIRD-COUNTRY NATIONALS IN THE EU: THE CASE OF BULGARIA, ITALY, POLAND AND SLOVENIA
- ▶ SEPTEMBER 2026

LABOUR-INT III project is implemented by a consortium composed by SGIEurope, ETUC, SMEUnited, Eurochambres, a large range of partners across Europe, and the involvement of several national, European and International organisations.

► PARTNERS



► SUPPORTING ORGANIZATIONS





LIST OF ACRONYMS

CEDEFOP	European Centre for the Development of Vocational Training
EC	European Commission
EGM	Expert Group on Migration
EGSM	Expert Group on Skills-Matching
ENIC	European Network of Information Centres
EQPR	European Qualifications Passport for Refugees
EU	European Union
ICT	Intra-Corporate Transferees
IT	Information and Communications Technology
NARIC	National Recognition Information Centres
PES	Public Employment Services
RRFP	Repertorio Regionale delle Figure Professionali (Regional Repertoire of Occupational Profiles)
SMEs	Small and Medium Enterprises
SRVCC	Sistema Regionale di Validazione e Certificazione delle Competenze (Regional Skills Validation and Certification System)
TCN	Third-Country National
VET	Vocational education and training

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1. EXECUTIVE SUMMARY

The recognition of qualifications held by Third-Country Nationals (TCNs) remains a cornerstone for their effective integration into the European Union (EU) labour market. This report, part of the LABOUR-INT III project, provides an in-depth examination of the frameworks, practices, opportunities, and challenges associated with the recognition of TCNs' academic and professional qualifications for both regulated and non-regulated professions in four EU Member States: Bulgaria, Italy, Poland, and Slovenia. Qualification recognition is the process by which a relevant authority formally accepts a qualification obtained in another country as equivalent to its own, for the purpose of work, study or access to a regulated or non-regulated profession¹. Skills validation is the process by which relevant authorities identify, document, assess and certify skills that a person has, including those acquired through non-formal and informal learning. Special attention is devoted to the influx of Ukrainian nationals as beneficiaries of EU Temporary Protection Status. Their status has enabled a comparative analysis of the flexibility and responsiveness of national recognition systems across different TCN groups. A bottom-up methodology was employed to gather perspectives from TCNs, social partners, and policymakers at the EU and country levels.

Over the last decade, the EU has made significant progress in developing tools and recommendations to facilitate the recognition of academic and professional qualifications from third countries. For EU nationals and qualifications obtained within the EU, the Professional Qualifications Directive (Directive 2005/36/EC) provides a harmonised system of mutual recognition for regulated professions across the Union. Most recently, Commission Recommendation (EU) 2023/7770 on the recognition of TCN qualifications aims

to streamline and accelerate TCN qualification recognition processes, bringing them closer to the procedures followed for Member States citizens. However, the absence of a comprehensive framework for TCNs – unlike the mutual recognition system for EU nationals – means that recognition processes remain fragmented and inconsistent across Member States. The absence of such a framework therefore undermines the credibility of these processes with relevant stakeholders. This level of fragmentation may also result in the underutilisation of skills, overqualification, and persistent barriers to employment for TCNs. The generally more positive feedback on the situation of Ukrainian nationals demonstrates how qualification recognition can be more effective when recognition procedures are streamlined and supported by a conducive legal framework, towards equal treatment.

In LABOUR-INT III focus countries, each Member State retains primary responsibility and competence for the recognition of qualifications obtained in third countries. EU tools, such as the Skills Profile Tool², the ENIC-NARIC Networks, the European Qualifications Framework and the forthcoming Skills Portability Initiative, can help national authorities to some degree, although stakeholder consultations pointed to their sometimes-cumbersome nature and other concerns³. While line ministries and professional chambers, such as organisations representing specific sectors, are typically the competent authorities for recognising qualifications for regulated professions, the procedure is less formal and less costly in the case of qualifications for non-regulated professions. In the latter case, the process is often left to the discretion of individual employers and TCNs bear most of the costs. For this report, qualification recognition encompasses three main steps: identification and profiling,

¹ The definition of qualification recognition takes into account official terminology used by the European Commission for the recognition of academic diplomas and professional qualifications. It also refers to the recognition of qualifications related to non-regulated professions, as described in the LABOUR-INT III grant agreement. For more information, see https://europa.eu/youreurope/citizens/education/university/recognition/index_en.htm, https://europa.eu/youreurope/citizens/work/professional-qualifications/index_en.htm and <https://www.labour-int.eu/index.php/labour-int-ii/>.

² See <https://ec.europa.eu/migrantskills/>.

³ These concerns revolve around the design and governance of the Skills Portability Initiative, which should be inclusive.

testing, formal recognition of TCNs' qualifications and/or validation of TCNs' skills.

Promising national practices on TCN skills identification and profiling include Bulgaria's MyCompetence platform, Italy's Regional Skills Validation and Certification System (SRVCC) and Poland's Kwalifikator tool⁴. Nevertheless, common challenges, such as time and financial constraints in assembling the required documentation, lengthy processing times and limited public administration capacity, generate substantial delays. This situation increases the risk of TCNs falling into undeclared work and facing abuse from criminals, including forced labour.

Language testing plays a crucial role in assessing professional skills. If a TCN demonstrates an adequate level of language knowledge, employers are more likely to evaluate other skills/competences and accelerate the overall skills-matching process. Pilot initiatives, such as the one championed by the Confederation of Employers in Apulia in collaboration with a local public school, also suggest that employers consider language proficiency an indicator of TCNs' motivation to find employment in their community. On qualification recognition and skills validation, the process may be longer than average for regulated professions, which increases the likelihood of TCNs accepting low-skilled jobs in the meantime and ending up with a mismatch. In turn, mismatches undermine TCNs' career progression at their qualification level. In other cases, the specific step of skills validation may require additional skills training⁵.

In light of the current EU initiatives and lessons learned described in this report, three main recommendations can be made to enhance the recognition of regulated and non-regulated qualifications of TCNs in focus countries and across the EU:

First, success stories from other countries, such as Germany's approach to streamlining the identification, testing and validation of TCN skills, can inform future similar initiatives in LABOUR-INT III focus countries and across the Union.

Second, public administrations need more human, financial, and training resources to improve coordination and consistent implementation of rapidly evolving EU rules.

Third, language proficiency tends to be a strong indicator of TCNs' high productivity on the job. For this reason, language testing centres should be connected with SMEs to encourage employers to test TCNs with advanced language knowledge on other skills. Additional recommendations include, amongst others, extending the fast-track procedures followed for Ukrainians to other TCNs, both refugees and migrant workers; subsidising or sharing with employers the cost of sworn translations of certificates obtained in third countries based on TCNs' income; and organising job fairs and 'testing days' to bring together TCNs, employers and other key stakeholders, such as trade unions, in a safe environment under the coordination of relevant authorities.

Section 6.2 includes the full list of proposed guidelines and recommendations to improve the recognition of TCN qualifications for regulated and non-regulated professions in the four focus countries. The guidelines are numbered and referred to in brackets in relevant sections of the document (e.g. #1 for guideline number 1). In other cases, they capture additional feedback from LABOUR-INT III stakeholders throughout the drafting process.

⁴ Bulgaria's MyCompetence platform is available in Bulgarian and English. As of 2022, it had at least 30,000 active users. For more information, see <https://en.bia-bg.com/news/view/29755/>. Poland's Kwalifikator tool provides information in Polish and English. The number of active users is unknown. As for Italy, information on qualification recognition varies by region and there is no online platform or portal. For the Apulia region, information is available in Italian only and the number of active users is unknown. See <https://www.uniba.it/it/centri/cap/servizi-accademici-di-terza-missione/sistema-regionale-competenze>.

⁵ LABOUR-INT III document *Towards a multistakeholder approach to skills matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market* explores skills development options in detail.

2.

▶ INTRODUCTION

As the EU strives to attract workers with a variety of skills, the question of how to recognise the academic qualifications and validate the professional skills of TCNs has gained increasing prominence. This question is central to the social and economic inclusion of TCNs, the competitiveness of EU economies, and the realisation of the European Union of Skills launched in 2025.

This report investigates the recognition of TCN qualifications in relation to both regulated and non-regulated professions, with a particular focus on four Member States: Bulgaria, Italy, Poland, and Slovenia. Following EU standard definitions⁶, the recognition of regulated qualifications is the formal, legally required process by which a competent authority in the EU certifies that a TCN's professional qualifications are equivalent to national standards. This legally required process is reserved for professionals, such as doctors, lawyers or architects. The recognition of non-regulated qualifications, on the other hand, is a less formal assessment by employers or education institutions of TCN qualifications, skills or learning outcomes.

For the purposes of this document, qualification recognition refers to two distinct processes. Regarding TCN qualifications, it covers the assessment, any verification if necessary, and recognition of academic qualifications for both regulated and non-regulated professions. Regarding TCNs' professional skills, the document covers the assessment, testing of skills linked to non-regulated professions and validation of skills for both regulated and non-regulated professions. The report partly overlaps with LABOUR-INT III deliverable D2.2 *Towards a multistakeholder approach to skills matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market* to explore the interplay between skills assessment and validation, and the broader process of skills-matching for TCNs.

⁶ See CEDEFOP, *Terminology of European education and training policy*, available at <https://www.cedefop.europa.eu/en/tools/vet-glossary>.

2.1



METHODOLOGY AND RESEARCH CONSTRAINTS

The present analysis builds on an extensive desk review of EU and national legislation, LABOUR-INT documentation and recent academic research. In line with the multi-stakeholder approach promoted by the LABOUR-INT projects, this report draws on consultations with 45 stakeholders. Of these, 16 were TCNs (nine refugees/Temporary Protection status holders, seven migrants), including twelve women and four men from three focus countries. In addition, interviews were organised with representatives from public employment agencies, employers, trade unions, chambers of commerce, and NGOs across several EU countries. A list of the organisations interviewed is included in Annex 9.1. Due to their central role in the project, national focal points from each focus country were contacted multiple times to seek additional inputs and clarification. The multi-stakeholder approach adopted in this assessment is consistent with the methods used since the first edition of LABOUR-INT. It acknowledges that there is no universal solution to skills-matching challenges, nor are there universally applied procedures at national and EU levels. Instead, the multi-stakeholder approach seeks to capture the diversity of policy and practice across the four EU Member States analysed in this report.

Research constraints were mainly due to limited time and data availability. The specific geographic scope of this report means that its findings may not necessarily be applicable to the entire EU. Regarding the recognition of TCN qualifications in Italy, research findings were limited to the Apulia region due to the country's highly decentralised approach to TCN labour market integration and in line with the original LABOUR-INT III grant requirements. Time constraints also limited research findings to the activities of LABOUR-INT III project partners and feedback from the TCNs they assist. To the extent possible, efforts were made to select a representative TCN sample for the interviews. However, some TCNs could not be interviewed or could only provide limited information due to language barriers.

The following sections provide background and context information at EU and country levels. They then examine current practices, opportunities, and main challenges in qualification recognition and offer detailed recommendations on how to improve qualification recognition procedures for LABOUR-INT III stakeholders.

3.

▶ BACKGROUND AND CONTEXT

This section provides an overview of recent EU legislation on qualification recognition, as well as of existing EU initiatives and tools, including for recognising the qualifications of Ukrainian nationals. It then analyses the normative framework in focus countries. The final part summarises the role of National Recognition Information Centres (NARICs) and their linkages with the European Network of Information Centres (ENICs).

3.1

OVERVIEW OF EU AND NATIONAL NORMATIVE FRAMEWORKS ON QUALIFICATION RECOGNITION FOR TCNs

The EU's approach to qualification recognition is shaped by a combination of binding directives, recommendations, and voluntary cooperation mechanisms. Based on the EU's competencies vis-à-vis its Member States under EU treaties, this approach builds on the Lisbon Recognition Convention, developed by the Council of Europe and UNESCO in 1997, to facilitate fair, transparent, and flexible recognition of higher education qualifications. All EU Member States have signed the Convention.

For EU nationals, the Professional Qualifications Directive (Directive 2005/36/EC) provides a harmonised system of mutual recognition for regulated professions of EU nationals holding qualifications obtained in the Union, including streamlined recognition for certain sectoral professions such as doctors, nurses and architects, based on the principles of mutual trust and comparability between Member States' education and training systems.

By contrast, there is no overarching, legally binding framework for the recognition of TCN qualifications. The Intra-Corporate Transferees, or ICT, Directive (2014/66/EU) and the recast Blue Card Directive (EU 2021/1883) introduced specific rules for highly skilled TCNs and significant reforms to the previous system under Directive 2009/50/EC. In particular, the ICT Directive has allowed for the recognition of professional experience as equivalent to formal qualifications in some cases. Other directives, such as those covering long-term residents (2003/109/EC), single permit holders (2024/1233/EU) and refugees (2011/95/EU), provide more equal treatment in recognition procedures, but their implementation at national level remains uneven. Commission Recommendation (EU) 2023/7770 on the recognition of qualifications of third-country nationals aims to streamline and accelerate TCN qualification recognition processes, bringing them closer to the procedures followed for Member States citizens.

For Ukrainian nationals, in response to the Russian invasion of Ukraine in 2022, the EU activated the Temporary Protection Directive, granting Ukrainian nationals the right to work

and access recognition procedures in all Member States. Recommendation (EU) 2022/554 specifically addresses the recognition of Ukrainian qualifications through flexible and rapid mechanisms, even when individuals lack full or verifiable documentation. Because this framework is time-limited, its future extension or lapse raises concerns about continuity and integration outcomes.

LABOUR-INT III focus countries generally apply EU Directive 2005/36/EC with varying degrees of specificity. **Bulgaria** is where national legislation is most articulated, with the Law for Recognition of Professional Qualifications (2013) regulating the terms and conditions for recognising professional qualifications acquired in other EU Member States and third countries. This is the main law enabling access to, and exercise of, regulated professions in the country. The Ordinance on the terms and conditions for issuance of certificates of acquired professional qualifications (2014) also applies to TCNs, specifying the procedures required for recognition in regulated professions. Recent amendments to the Labour Migration and Labor Mobility Act (LMLMA) facilitate the recognition of higher professional skills and qualifications for TCNs seeking highly qualified employment, in line with EU Directive 2021/1883.

In Italy, the TCN qualification recognition process is governed by Legislative Decree No. 206/2007, which implements EU Directive 2005/36/EC as amended by Directive 2013/55/EU, and Presidential Decree No. 394/1999 for non-EU nationals. The so-called "*legge Fornero*" (2012) allowed the harmonisation of qualifications across the entire country. The subsequent Interministerial Decree of 30 June 2015 established a mechanism of mutual recognition among regional qualifications and skills, as well as procedures for the validation and certification of nonformal and informal learning. A National Qualifications Framework was introduced in 2018 to operationalise the system and ensure homogeneity across Italian regions, in line with the European Qualification Framework. **Poland's** Act on the Recognition of Professional Qualifications Acquired in EU Member States (2015) applies to TCNs for

regulated professions and introduces national 'nostrification' (equivalence between third-country and national qualifications) procedures for non-regulated qualifications.

In Slovenia, the main legislative reference is the Act on the Evaluation and Recognition of Education (2011), which sets out the procedures for determining the comparability of third-country educational qualifications with Slovenian ones. The procedure is administered by the ENIC-NARIC Centre at the Ministry of Education. This act applies to all holders of foreign qualifications, including citizens of non-EU countries. If a person from a third country wishes to

pursue a regulated profession in Slovenia (for example, as a doctor, architect, teacher, etc.), the Act on the Procedure for the Recognition of Professional Qualifications for the Pursuit of Regulated Professions (2016) applies. This act primarily governs the recognition of qualifications for EU citizens, but its provisions may also be applied to citizens of third countries if so provided by a special law, an international agreement, or the principle of reciprocity. Additionally, there are sector-specific laws that precisely define the conditions for the recognition of qualifications (for example, the Medical Practitioners Act for doctors or the Social Security Act for social workers).

3.2

EU AND NATIONAL TOOLS FOR TCN QUALIFICATION RECOGNITION IN FOCUS COUNTRIES

Building on the momentum generated by the 2023-2024 European Year of Skills, the 2025 Union of Skills aims to establish a cohesive framework for skills recognition through over 30 initiatives on education and training, in addition to intra-EU mobility. In practice, the main EU tools on TCN qualification recognition are the Skills Profile Tool, the European Qualifications Passport for Refugees (EQPR) and the forthcoming Skills Portability Initiative.

The Skills Profile Tool, designed in 2017 as part of the Skills Agenda for Europe, is a multi-lingual online questionnaire for early profiling of TCN skills, available on the Europass platform. It is intended for use by reception centres, PES, social services and other national authorities and it is generally meant for a preliminary assessment of TCN qualifications and skills. In focus countries, the Skills Profile Tool is used in introductory conversations between TCNs and their first national contact. It is available in all official EU languages, plus Ukrainian since 2022, and a few other languages.

The second resource, the European Qualifications Passport for Refugees or EQPR, is an international assessment tool developed by the Council of Europe in 2017 to help refugees, asylum seekers and beneficiaries of temporary protection demonstrate their higher education qualifications, even without full documentation due to displacement or conflict.

The third resource, still under development, is the Skills Portability Initiative under the Union of Skills, which the European Commission launched in March 2025. It aims to speed up recognition through cross-border simplified procedures, digital credentials, inclusion of regulated and unregulated professions, and stronger cooperation among Member States. Its purpose is to reduce administrative burden, improve predictability, and support faster access to regulated professions⁷.

⁷ Possible policy solutions under Action 3 include establishing EU rules that simplify qualification recognition procedures; approving a list of qualifications or providers from third countries that meet minimum training requirements for priority professions in the EU; exploring options to strengthen the capacity of national authorities; and developing mechanisms that allow TCNs to access regulated professions faster. For more information, see: https://employment-social-affairs.ec.europa.eu/news/commission-seeks-views-skills-portability-initiative-2025-12-05_en.

In LABOUR-INT III focus countries, each Member State retains primary responsibility for the recognition of qualifications obtained in third countries, ensuring consistency in implementing European and international norms at the country level. National Recognition Information Centres (NARICs) and, in some cases, sectoral regulatory bodies, play a central role in evaluating the authenticity and comparability of higher education degrees obtained in third countries, as explained in the following section. Member States also rely on the European Network of Information Centres (ENICs) and the ENIC-NARIC network, a broader collaborative platform of national information centres from 56 countries which supports the implementation of the Lisbon Recognition Convention. In addition, the EQUAL project (European Qualification – Refugees and Recognition) developed by the Norwegian Directorate for Higher Education and Skills in 2023 and co-funded by the EU, aims to support ENIC-NARICs in selected European countries, including Italy and Poland, in establishing fair and transparent recognition of refugees' qualifications through training and supervision.

In addition, resources from international organisations, such as the International Organization for Migration and the International Labour Organization, have been identified as useful to strengthen TCN recognition qualification across the EU. These resources include, for example, the 2019 ILO General principles and operational guidelines for fair recruitment and definition of recruitment fees and related costs.

4.

▶ **CURRENT QUALIFICATION RECOGNITION PRACTICES IN LABOUR-INT III FOCUS COUNTRIES**

Each focus country has a central labour or employment authority responsible for qualification recognition of TCNs. They often work in coordination with line ministries and professional chambers, especially for regulated professions. Table 1 summarises the formal procedures TCNs must follow to have their qualifications recognised in Bulgaria, Italy, Poland and Slovenia, and lists the national authorities mandated to manage this process.

TABLE 1.
SUMMARY OF NATIONAL PROCEDURES AND RELEVANT AUTHORITIES
FOR THE FORMAL RECOGNITION OF QUALIFICATIONS OBTAINED IN
THIRD COUNTRIES

Focus Country	Regulated qualifications: recognition process and relevant authorities	Non-regulated qualifications: recognition process and relevant authorities
Bulgaria	Application to the relevant ministry or professional chamber (e.g., Ministry of Education and Science, Ministry of Health, Ministry of Justice, sectoral ministries/ chambers). May require compensatory measures, e.g. exams, adaptation periods. NACID (National Centre for Information and Documentation, the Bulgarian ENIC-NARIC Centre) provides guidance.	Employers have the discretion to recognise third-country academic and professional qualifications. If necessary, NACID can certify the equivalence between third-country and Bulgarian qualifications.
Italy	Application to the relevant ministry based on the profession (e.g., Ministry of Education, University and Research (MIUR); Ministry of Health; Ministry of Justice; Ministry of Economic Development; Ministry of Culture). May require compensatory measures, e.g. exams or adaptation periods.	Higher education institutions (HEIs) carry out individual assessments to recognise academic qualifications. For professional qualifications, there is no legal requirement. CIMEA (Italian ENIC-NARIC Centre) can issue comparability and verification statements on TCN professional qualifications; however, these documents do not constitute formal recognition.
Poland	The National Agency for Academic Exchange (NAWA, Polish ENIC-NARIC Centre) is responsible for assessing qualifications from third countries. The recognition procedure may require exams or adaptation periods. Ukrainians can use alternative means to prove their qualifications if they lack official documentation.	Employers have the discretion to determine whether a qualification from a third country is sufficient for a specific role or if additional evidence of equivalence is required. They can also verify third-country academic credentials directly by using NAWA's online 'Kwalifikator' platform.
Slovenia	The competent institution for the recognition of formal education is the ENIC-NARIC Centre, at the Ministry of Higher Education, Science and Innovation. For the recognition of professional qualifications, relevant institutions are line ministries (health, labour, infrastructure), professional chambers or regulatory bodies overseeing regulated professions. The Ministry of Labour is the National Contact Point (NCP) for the recognition of professional qualifications. The NCP provides all the necessary information on regulated professions, recognition procedures and competent authorities	Non formal qualifications can be recognised through the National vocational qualification system (NVQ). The competent institution for NVQ is the Institute of the Republic of Slovenia for Vocational Education and Training (CPI).

Drawing on previous LABOUR-INT reports, the recognition of TCNs' professional qualifications in focus countries encompasses three main steps: qualifications/skills identification and profiling, qualifications/skills testing, and qualifications/skills validation⁸. In addition to the national procedures summarised in Table 1 above, focus countries have adopted the following practices for each of these steps:

In Bulgaria, the "MyCompetence" system is a free online assessment tool accessible to TCNs and EU citizens alike. Initially developed with European Social Fund support in 2009, MyCompetence brings together national authorities, social and economic partners, and educational providers to classify skills into technical, cross-cutting, social skills and managerial categories. This multi-stakeholder mapping process helps identify skills for key occupations in 25 economic sectors, including low-skills professions, and align VET curricula to labour market needs. For highly skilled professions, Bulgaria has simplified requirements: TCNs can qualify by providing an official document verifying at least five years of professional experience at a level equivalent to higher education in the relevant sector, or five years of specific experience, skills, or qualifications relevant to the position. For low-skilled positions, the primary assessment is not standardised but usually employer-driven. Employers must conduct a preliminary market study to demonstrate that no suitable local candidates are available before hiring a TCN. Then, they validate TCN skills or experience by reviewing TCN's documentation and carrying out job interviews and technical tests if necessary. Employers must also comply with sectoral quotas and fair working conditions requirements. While this type of employer-led validation may be faster than a government-led process, it may lead to inconsistency due to lack of standardised assessments.

In Italy, specifically in Apulia, the regulation and identification of professional qualifications are set out in the Regional Repertoire of Occupational Profiles (Repertorio Regionale delle Figure Professionali or RRFP), approved by Administrative Decree No. 686 of 09/08/2016. The RRFP is organised into job descriptions and standards containing detailed information on the characteristics of each qualification/pathway, as well as the skills and knowledge to be acquired. The Repertoire is not exhaustive but represents the most common occupations in Apulia which are authorised by the Regional Administration and other relevant authorities. TCNs with a valid residence permit

may attend training courses linked to the RRFP and thereby obtain an official certificate. Often, one of the participation requirements is at least a basic knowledge of the Italian language, without which the learning process may be compromised. In such cases, preliminary Italian language training may be provided, with a focus on the technical language related to the specific occupational profile. The experience within the LABOUR-INT III project in Apulia is based on the philosophy of the Repertoire: training, in fact, involves the delivery of vocational training drawn from the RRFP (Competence Units), so that through the project activities trainees can acquire certified skills that may count as training credits.

In terms of TCN qualification recognition, in Apulia, the Regional Council has established a System of Validation and Certification of Skills (SRVCC) in partnership with the Centre for Lifelong Learning (Centro per l'Apprendimento Permanente or CAP) at the University of Bari. SRVCC is designed to identify, test and certify skills and qualifications acquired in formal, non-formal and informal contexts. Independent experts may test TCNs' skills in case of incomplete documentation, based on three criteria: value, pertinence and validity. If the TCN meets at least 70% of the requirements for the targeted professional profile, as defined by a regional registry, then the Apulia Regional Council grants formal certification, which is recognised at national and EU level as well. If the TCN does not meet the 70% requirement, as determined by the Council, they may seek additional training through CAP.

In Poland, public employment services (PES) are increasingly involved in skills assessment and profiling, especially when TCNs cannot provide full documentation about their professional qualifications. Such assistance is not migrant-specific and is available to all PES clients if needed. Yet, it should be added that given the extent of employer-centered skills assessment and the profile of jobs available to migrants, the engagement of public authorities remains relatively small in this regard. Employers might sponsor EU-accepted certificates so that prior skills are validated, but this is voluntary. An identified issue is that TCNs know little about the skills validation process. There are knowledge gaps both among migrants already resident in Poland and those who start their migration journey.

In Slovenia, reception services, managed by the state or having a concession from the state, help TCNs with procedures, skills assessment, and profiling. Slovenia uses

⁸ Other steps, such as training, upskilling and reskilling, are more closely related to the skills-matching process and are therefore addressed in the LABOUR-INT III document *Towards a multistakeholder approach to skills-matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market*.

tools such as the EU Skills Profile Tool but primarily relies on its national frameworks and institutions for formal recognition and profiling. Candidates are often referred to the Employment Service of the Republic of Slovenia (ESS), which offers advice and guidance on the recognition of informally acquired skills, as well as several options for financing the costs of skills recognition. A TCN benefitting from international protection who wishes to have their education in their home country recognised must apply to the chosen educational institution and attach court-certified translations of certificates and diplomas. The costs associated with the recognition of diplomas, certificates and other evidence of formal education obtained in third countries are covered by the Government Office for the Care and Integration of Migrants. If a TCN wishes to pursue

further studies in Slovenia, they can apply directly to their chosen institution. If they wish to work, they need to apply to ENIC-NARIC.

LABOUR-INT III project partners contribute to either some or all of the stages in qualification recognition, to varying degrees. Table 2 below clarifies their role in the TCN qualification recognition process, including support to TCNs seeking formal recognition of their academic and professional qualifications. As a complement to Table 1, and in the context of the LABOUR-INT III project, Table 2 provides a map of the main stakeholders involved in qualification recognition and skills validation in the four focus countries of Bulgaria, Italy, Poland and Slovenia, both within and outside the LABOUR-INT III project.

TABLE 2.
PROJECT PARTNERS' ROLE IN TCN QUALIFICATION RECOGNITION AND SKILLS VALIDATION IN FOCUS COUNTRIES WITHIN AND/OR OUTSIDE THE LABOUR-INT III PROJECT

Focus country and partner	Project partners' contribution to TCNs' decent employment conditions within and/or outside the LABOUR-INT III project						
	Qualifications assessment	Qualifications verification	Qualification recognition	Skills assessment	Skills testing	Skills validation	Other contribution
Bulgaria							
CARITAS Sofia	x	x	x	x	x		
CITUB	x	x	x	x	x	x	
Italy							
SMILE Puglia	x	x	x	x	x	x	
Poland							
OPZZ							
Slovenia							
ESS	x	x	x	x	x	x	

5.

▶ **OPPORTUNITIES AND CHALLENGES IN RECOGNISING TCN QUALIFICATIONS AND VALIDATING TCN SKILLS IN FOCUS COUNTRIES**

The following sections describe the main opportunities and challenges faced by LABOUR-INT III project stakeholders involved in the recognition of TCN qualifications and skills validation in focus countries. At the national level, stakeholders' views point to the following commonalities:

5.1

ASSESSMENT OF QUALIFICATIONS AND SKILLS

For the **assessment of qualifications and skills**, project partners sometimes use the EU Skills Profile Tool in the early stages of the assessment process, usually during introductory conversations between TCNs and representatives from reception or integration centres. This finding is consistent with the original purpose of the EU Skills Profile tool, which is to carry out a preliminary mapping of the TCN's set of qualifications, skills and work experience for further discussion. Formal qualification recognition happens at a later stage. The use of this tool remains limited, as stakeholders interviewed found it to be quite time-consuming, if not cumbersome. National assessment tools, such as Bulgaria's MyCompetence platform or Poland's Kwalifikator search engine, appear more useful to a wide range of stakeholders, from employers to trade unions to public administration officials to TCNs themselves.

Time and budget constraints are significant barriers to the effective identification and profiling of TCN qualifications and skills (#1). Except for Temporary Protection beneficiaries, TCNs may spend months assembling their applications for qualification recognition, particularly for regulated professions. This preliminary stage lengthens the overall time it takes for TCNs to have their qualifications recognised. Refugees in particular may have left their home country without key documents, which makes it more challenging to prove their qualifications. Sworn translations of diplomas, when required, incur extra charges that some TCNs may not be able to afford (#11).

Administrative delays by competent authorities are another challenge. Processing complete applications usually takes months, ranging from one to two months in Bulgaria to around three months in Italy and Poland. Delays can increase further when authorities request additional documentation (#5, #8, #14, #17).

During this waiting period, TCNs are in a particularly vulnerable position as they need to sustain themselves (and often their families too) in any way they can. This means either finding a job, whether in the formal or informal labour market, or receiving subsidies from the state or securing other sources of income through alternative means. State contributions to TCNs' living expenses in focus countries during this period greatly vary depending on TCNs' status. For example, the Ukrainian beneficiaries of Temporary Protection status interviewed for the LABOUR-INT III project in Slovenia shared that they were receiving a modest but adequate contribution to their monthly rent from the state. On the other hand, refugees in the same country reported that they could hardly afford to buy food with their daily subsidy. Access to subsidies is typically governed by stringent conditions and can vary widely based on national legislation and individual legal status. Limited access for TCNs without Temporary Protection can lead them to accept the first available job, even when it does not match their skills.

A third challenge is limited capacity to implement EU legislation at national level. Public officials interviewed for the project pointed to chronic understaffing and weak administrative support for TCN services, which makes it harder to keep pace with legal changes. In practice, some systems depend on the extra effort of individual staff rather than on strong institutional capacity. While this shows commitment, it can also lead to subjective interpretations and inconsistent application of EU rules (#1, #7, #9, #17).

From an employer perspective, fragmented and lengthy recognition procedures translate directly into missed recruitment opportunities, higher hiring costs and persistent skills shortages. In the absence of clear and predictable procedures, employers (particularly SMEs) face significant challenges in assessing third-country qualifications, interpreting non-standardised documentation and navigating complex administrative requirements. As a result, employers may underuse available talent or rely on arbitrary assessment practices (#2, #3, #13, #15, #17).

5.2

► VERIFICATION OF TCNs' QUALIFICATIONS

Verification of TCNs' qualifications may be necessary if their credentials are not fully comparable to the formal qualifications required to practice a profession. Even some TCNs with regulated qualifications, such as lawyers, may find themselves in a limbo when it comes to testing their knowledge, as their degrees may be too specific to the rules and regulations of their country of origin to be relevant to their new setting. This specific situation requires special attention from competent authorities (#10).

Testing of TCNs' skills is usually done by employers at the outset of the process in each focus country. This is especially the case with non-regulated professions, which allow TCNs to access the labour market directly. Knowing the local language plays a catalytic role in skills testing in all focus countries. For TCNs, performing well in language tests – at least at B1 level – opens the door to more professional opportunities. Besides being a skill in itself, speaking the language of the host country improves the TCN's performance in other professional skills. All employer associations interviewed for this assessment identified language skills as a crucial enabler of other TCN occupational skills as well. In particular, feedback from the main employer association in the Apulia region

(Confindustria Puglia) suggested that employers view TCNs who know Italian as more committed to staying in Italy in the long term than those who do not. In other words, employers look to language proficiency as a test of TCNs' broader reliability, which inspires them to invest in TCN skills through apprenticeships and job placements. In turn, according to Confindustria, TCNs' level of motivation to study Italian dramatically increases when the language training programme gives them priority access to job opportunities after completion of their course. There seems to be a strong relation between language testing and other skills testing. In addition, stakeholder consultations indicated that skills-testing works better when it is part of a skills-training programme organised by a school or the TCN's employer, not as a stand-alone event. This is possibly because mutual expectations about testing criteria are clearer and there is a pre-existing relationship between the TCN and the school or the employer. In practice, employers (especially SMEs) tend to rely on practical, work-based assessment and on-the-job performance rather than on formal recognition procedures, particularly when documentation is incomplete or difficult to interpret. This highlights the importance of strengthening practical validation pathways alongside formal recognition systems (#3, #4, #5, #7, #8, #12, #14, #15, #16).

5.3

► TCN QUALIFICATION RECOGNITION AND SKILLS VALIDATION

For **TCN qualification recognition and skills validation**, regulated qualifications may be harder to certify than non-regulated ones due to stricter certification requirements. Similarly, if the TCN skills validation process does not lead to a successful outcome due to one of the challenges described above, the result may be that TCN's actual skills are mismatched and underutilised. In turn, this outcome may lead TCNs to stay in a job just long enough to find a better opportunity and leave, including to other EU countries. Some TCNs interviewed described a pattern of job-hopping and instability due to lack of validation of their skills. On their

part, employer associations noted how mismatches often occur when using online profiling tools, like MyCompetence in Bulgaria, which in their view is of limited functionality. Efficient skills validation is therefore an essential component of an EU country's ability to attract the right talent. In other cases, skills validation may come at a later stage if TCN's test performance is deemed only partly satisfactory. Depending on the outcome of the testing phase, some TCNs may be required to go through a skills-development phase before having their professional credentials certified⁹ (#7, #8, #14).

⁹ The LABOUR-INT III document *Towards a multistakeholder approach to skills matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market* explores skills development options in detail.

6.

▶ IMPROVING THE RECOGNITION OF TCNs' QUALIFICATIONS AND THE VALIDATION OF THEIR SKILLS

This section draws on recommendations from past LABOUR-INT editions and the insights from LABOUR-INT III stakeholders analysed above to distil key practical suggestions for improved recognition of TCNs' qualifications and validation of their skills in the EU. It assesses whether the lessons learned so far can help address current challenges in recognising regulated and non-regulated qualifications and validating professional skills in focus countries. The section then provides a set of guidelines for country-level stakeholders, specifically focusing on skills assessment, testing and validation and qualifications identification, verification and recognition. As the report focuses on a limited number of focus countries and stakeholders, these recommendations should be read as operational suggestions rather than broadly applicable conclusions.

6.1

LESSONS LEARNED SO FAR

The first two LABOUR-INT editions produced a wealth of knowledge which remains highly relevant to current qualification recognition practices in the EU and to LABOUR-INT III efforts more broadly. In fact, most recommendations from previous LABOUR-INT reports strongly align with feedback from key informants for this report. For example, the Expert Group on Skills and Migration's final report from the first edition of LABOUR-INT in 2017 already highlights the importance of involving employers in the process of skills validation and recognition of professional qualifications¹⁰, especially if it is a challenge.

Two recurring learnings emerge. The former is the limited uptake of recommendations from one LABOUR-INT iteration to the next. Extensive consultations with country-level stakeholders revealed that many of the same obstacles and opportunities identified in earlier projects persist, including in Italy, which is the only focus country to feature in all three LABOUR-INT editions. This trend seems to be due to multiple factors, including staff turnover and lack of resources or institutional leadership to implement previous recommendations. A dedicated study on this trend would be most timely.

The second, related, learning is that previous LABOUR-INT project activities implemented in Germany are particularly relevant to addressing challenges in TCN qualification recognition, skills-validation and their integration into the EU labour market more broadly. In the wake of the 2015-16 refugee influx, the German government took proactive steps to collaborate with enterprises willing to employ refugees. With the adoption of improved labour laws by Parliament (the 2016 Integration Act), refugees could benefit from higher protection and job security. Qualification recognition procedures were streamlined to enable SMEs to offer refugees a minimum of three years of vocational training, followed by a period of two years of employment. This five-year package was grounded in 'legal certainty', as one interviewee, the representative of an employers' association, recalled. It gave refugees the security they needed to start a new life in their host country and it also gave SMEs a predictable return on their training investment. Given its success in improving employment outcomes, the five-year initiative was later extended to migrants. The German experiment demonstrates how a favourable legal environment, coupled with a coordinated multi-stakeholder approach and political leadership, can unlock TCNs' talent potential in the EU. This experiment could be replicated in other EU countries with similar enabling conditions, with due consideration for their specific labour market context (#2).

6.2

PROPOSED GUIDELINES TO IMPROVE THE RECOGNITION OF TCNs' QUALIFICATIONS AND VALIDATION OF THEIR SKILLS

In light of the practices and lessons learned above, a number of suggestions can be made to improve the recognition of regulated and non-regulated qualifications of TCNs in focus countries and across the EU. What works best is a combination of policy, institutional and practical measures implemented through a well-coordinated approach to qualification recognition and skills validation, particularly at national level. In general:

Skills identification and profiling require stronger capacity in public administration and reception centres. Across all focus countries, Welcoming Services, PES and relevant partner organisations need more human, financial and material resources to respond to TCN inquiries on qualification recognition and skills validation more efficiently. They also require regular training to stay current on EU policy changes and their implications for national policies – something which would enhance their

¹⁰ Salis E. and Pastore F. (2017) *LABOUR-INT Expert Group on Skills and Migration Final Report*, p. 11.

institutional knowledge. Finally, these public services should collaborate more with each other – as well as with other key stakeholders, such as employers and trade unions – to maximise the use of available resources. In particular, PES and employers should be involved earlier in the qualification recognition and skills validation process through faster and formal coordination mechanisms.

TCNs' successful performance in language testing can accelerate the validation of other skills. Connecting language testing centres with SMEs may encourage employers to prioritise successful TCN test-takers for further testing on other skills. Supporting TCN access to quality

language training, especially for those TCNs who do not have an adequate level of language proficiency, is an important factor in their labour market integration.

Table 3 summarises specific guidelines to make TCN qualification recognition and skills validation more effective. It is important to bear in mind that these recommendations may have different timelines. For example, the feasibility of guideline 13 on the recognition of refugee qualifications will largely depend on whether the EU Professional Qualification Directive will be revised under the forthcoming Skills Portability Initiative, which will be published in October 2026.

TABLE 3.
SUMMARY OF PROPOSED GUIDELINES TO IMPROVE TCN QUALIFICATION RECOGNITION AND SKILLS VALIDATION IN BULGARIA, ITALY, POLAND AND SLOVENIA

	Proposed guideline	Who should act?	Expected result
General guidelines			
1	Assessment: address under-staffing in and limited coordination between public administration and relevant partner organisations to better orient TCNs	• Welcoming Centres • PES • Reception Centres (NGOs) • Trade unions	Improved institutional knowledge and response to TCN inquiries; higher consistency in adapting relevant EU policies to the national context; improved collaboration between public administration officials and other key stakeholders
2	Skills assessment and validation: strengthen the conditions and incentives for employers to invest in TCN skills assessment and validation through more predictable procedures, higher legal certainty, partnerships with training providers and cost-sharing mechanisms	• European Commission • National authorities • Employer organisations • Other social partners • PES	Increased employer participation in skills testing, training and validation processes; improved matching between TCNs' actual skills and labour market needs; more sustainable labour market integration outcomes
3	Skills testing: provide guidance and standard procedures to help employers test TCNs' ability to perform a job	• PES	Both TCNs and prospective employers can rely on more objective testing criteria; TCN skills are assessed and validated more consistently within and across EU countries
4	Skills testing: connect language testing centres with employers through formal partnerships or Memoranda of Understanding (MOUs)	• Language schools • Testing centres • Employer associations	TCN language students are more motivated to perform well on their language test if their language learning gives them priority access to job opportunities; employers can identify potential matches more easily, using language proficiency as an indicator of future high performance on the job

	Proposed guideline	Who should act?	Expected result
5	Qualification recognition: accelerate and standardise the recognition of refugee qualifications, based on the procedures used to recognise Ukrainians' qualifications	• EC • Relevant national authorities	Refugees can access the labour market more rapidly and find jobs that match their qualifications; employers can find talent more easily based on qualifications/skills acquired in TCNs' home countries
6	Recognition: recognise TCN qualifications for regulated and non-regulated professions in accordance with existing collective agreements	• National authorities • Employers	Decent salaries, improved working conditions and right to on-the-job training
7	Skills validation: Support current EU efforts to regulate apprenticeships and traineeships at the national level	• EC • Relevant national authorities	Smoother mobility of workers, easier skills assessment and upskilling of TCNs; lighter administrative procedures for trainees and employers alike
8	Skills validation: accelerate the validation of TCN skills based on the lessons learned from the process used for Ukrainian beneficiaries of Temporary Protection	• EC • National authorities • Employer associations	Non-Ukrainian TCNs can access the labour market more rapidly and find jobs that match their qualifications; employers can find talent more easily based on qualifications/skills acquired in TCNs' home countries
For regulated qualifications			
9	Identification and profiling: automatic and standardised qualification recognition procedures for a higher number of non-EU countries; recognition of TCN qualifications via the European Qualification Framework	• EC • Relevant national authorities	Faster processing times; greater opportunity for TCNs to access formal employment; lower risk of skills under-recognition and mismatch
10	Testing: clarify how TCNs can continue to exercise their regulated profession in EU countries when their qualifications are country-specific (e.g. lawyers)	• EC • National authorities	Smoother recognition of cross-cutting qualifications of TCNs in regulated professions; faster assessment of complementary training needs; lower risk of under-recognition of TCNs' qualifications. This suggestion requires further research
11	Recognition: subsidise the cost of sworn translations of third-country certificates based on TCNs' income; set up a special fund to help TCNs have their formal qualifications recognised	• National authorities • Coalition of the willing (e.g. foundations, private sponsors, supportive employers)	Removal of a financial barrier to TCN employment in regulated professions; faster processing times
12	Recognition: systematically compare qualification frameworks of select third countries with the European Qualification Framework and develop structured partnerships around qualification recognition with those countries	• EC • Member States	Easier recognition processes; faster and more informed recognition decisions; reduced administrative requirements for both national authorities and employers. This guideline supports work already in progress at EC level

	Proposed guideline	Who should act?	Expected result
13	Recognition: Support ongoing efforts by the EC, Member States and social partners to develop Common Training Frameworks for sector-specific work as part of the implementation and evolution of the Professional Qualifications Directive	• EC • Member States • Social partners	Facilitate worker mobility and help offset labour and skills shortages. Updates on the implementation and further development of the Professional Qualifications Directive should be available in October 2026
For non-regulated qualifications			
14	Identification and profiling: analyse whether TCNs' informal education can be recognised under certain circumstances. In these cases, a trust-based approach is recommended to avoid excessive administrative requirements	• Welcoming Centres • Independent experts • PES • Prospective employers	A larger pool of previously undetected TCNs with jobs that match their qualifications; TCNs would be more motivated to stay in the job/focus country for a longer period of time
15	Testing: organise job fairs and 'testing days' to connect TCNs and employers directly and follow TCNs' labour market integration more closely	• Welcoming Centres • PES • Employer associations	TCNs and employers would meet in a safe environment; local authorities would provide a concrete opportunity for employers to test TCNs' skills; lower risk of dis-information by illegal employers / intermediaries
16	Validation: ensure language exam certificates for TCNs are equivalent to those granted to host country citizens	• Competent authorities	TCNs can access the same education and employment opportunities as host country citizens
17	Validation: The EC should have adopt a trust-based approach with formal skills validation undertaken only if there is a specific need. When formal validation is undertaken, it is essential that Member States do not create unnecessary administrative requirements at national level or in ways hindering labour mobility	• EC • National authorities	Smoother validation of skills, reduced obstacles to labour mobility, and fewer excessive administrative requirements for employers and workers alike.

7.

► **FEEDBACK ON PROPOSED IMPROVEMENTS FROM FOCUS COUNTRIES AND OTHER STAKEHOLDERS**

LABOUR-INT III partners and national focal points had the opportunity to reflect on the preliminary findings from this report for approximately five months, from October 2025 to April 2026. Feedback was shared both in writing and in dedicated EGSM and Steering Committee meetings.

Stakeholders from the four focus countries underscored, first and foremost, a deep appreciation for the fact that their perspectives had been taken seriously and visibly reflected in the document. In some cases, country colleagues noted with some surprise that their inputs had been incorporated clearly, especially in the proposed guidelines summarised in Table 3. Their reaction points to a sense of validation and ownership of the whole co-drafting process. For the colleagues involved, seeing their views translated into the report signaled that the exercise had moved beyond formal consultation toward genuine multi-stakeholder dialogue. It also strengthened the credibility of the report itself, since the recommendations were clearly grounded in the realities described by those closest to implementation.

A second recurring theme was the added value of the report, and of LABOUR INT III outputs more broadly, in drawing attention to a structural issue that is often underplayed in other reports: the capacity constraints facing national public administrations. Country colleagues stressed that this is not a marginal administrative inconvenience, but a central bottleneck affecting the real-world support that TCNs receive in their attempts to enter the labour market. In practice, limited staff time, procedural overload and slow administrative workflows all shape whether qualification recognition and skills validation can happen efficiently. The importance of this point is especially clear in the example of language testing **in Poland**, where colleagues highlighted the limited capacity of state authorities to recognise the results of Polish language tests. When this recognition is delayed, TCNs cannot obtain the certificates required to access jobs that match their actual qualifications and skills. Polish colleagues also noted that public administration capacity had recently been the subject of a national roundtable with key stakeholders, showing that this concern has already been recognised domestically as a policy priority.

Feedback from **Slovenia** pointed in a similar direction, though with a different emphasis. Slovenian colleagues welcomed both reports as offering an external perspective on qualification recognition and skills validation, which they found particularly useful. From their point of view, an outside perspective can help reveal patterns and obstacles that are easy to miss when one is embedded in the day-to-day administration of a national system. They also expressed hope that the recommendations in this report would extend beyond the immediate group of stakeholders involved in the LABOUR INT III project. This reflects an important ambition: that the reports should not remain technical project documents but should instead serve as tools for broader policy influence.

Comments from **Bulgaria** reinforced the importance of language learning as a decisive factor in qualification recognition, skills validation, and broader skills matching. Colleagues stressed that language competence can function as a gateway: without it, even well-qualified individuals may remain excluded from suitable employment, regardless of demand in the specific labour market. This was especially visible in the situation of Ukrainian nationals seeking to work in regulated professions. Here, delays in academic recognition and skills validation were described as particularly problematic, because they are tied to long administrative procedures that can leave applicants in limbo

for extended periods of time. Bulgarian colleagues gave concrete examples of TCN doctors and lawyers whose skills are urgently needed in the country, yet who often must wait too long before they can work. Their proposed solution was notable in that it pointed to legislative change. In their view, the qualification recognition and skills validation procedures in Bulgaria require legal amendments to accelerate the process, particularly for regulated professions. On a separate note, the MyCompetence platform was widely regarded as unpopular among its users, particularly TCNs. The reasons for these comments are unknown.

At the global level, feedback underlined the challenge of condensing highly complex policy debates into relatively short reports. There was clear appreciation for the effort to produce concise, user-friendly texts, including this one, and for the way country-level experience was placed at the center of the analysis. At the same time, some stakeholders asked for deeper analytical treatment of the issues addressed. The comments therefore point to the challenge of striking the right balance between brevity and depth, especially when the subject matter involves overlapping legal, institutional, and labour market dimensions, as in the case of LABOUR-INT III reports.

On a related note, feedback at the global level also called for stronger evidence underpinning some of the recommendations presented in the report. That request is understandable, given that many guidelines suggested here are context-dependent. At the same time, all LABOUR-INT III reports must protect the confidentiality of interview sources, particularly at the country level, where stakeholders only shared information on the understanding that it would not be identifiable. This created an unavoidable trade-off. The balance achieved in the report is itself part of the methodological challenge: evidence must be presented responsibly, without exposing individuals or oversimplifying complex national realities.

Finally, global colleagues welcomed the fresh perspective that country-level inputs brought, including from a representative group of TCNs. They found it valuable to read about what happens on the ground in practice, rather than only in policy frameworks or institutional guidelines. In that sense, feedback from the focus countries did not merely confirm the report's relevance. It strengthened the case for grounding future analysis in lived implementation experience, since that is where the real constraints, opportunities, and policy lessons become most visible.

8.

▶ CONCLUSIONS AND MAIN RECOMMENDATIONS

8.1

SUMMARY OF FINDINGS

By examining the TCN qualification recognition and skills validation process in Bulgaria, Italy, Poland, and Slovenia, this report highlights persistent fragmentation despite ongoing progress at the EU level. Significant disparities remain between Member States and between the treatment of regulated and non-regulated professions. Even within the same Member State, such as Italy, qualification recognition and skills validation procedures may greatly vary from one region to another, leading to inconsistencies in implementation. While there has been meaningful improvement through the adoption of EU-level tools, such as the ENIC-NARIC Networks and the European Qualifications Framework, many TCNs continue to face protracted procedures, a lack of transparency, and limited access to jobs that truly leverage their skills and qualifications.

In contrast, the report findings highlight the importance of the current EU legislation for Ukrainian nationals, which provide key lessons to ensure more equal treatment in the EU labour market. Indeed, the experience of Ukrainian nationals under Temporary Protection has shown that rapid, flexible, and well-coordinated recognition mechanisms are not only possible but also highly effective. To the extent possible, future actions to improve TCN qualification recognition and skills validation should build on the lessons learned from integrating Ukrainian nationals into the EU labour market and apply this model to other TCNs.

8.2

SUMMARY OF KEY RECOMMENDATIONS

Member States should move toward streamlining qualification recognition and skills validation for TCNs to bring them closer to the systems available to EU nationals. There is a pressing need for clear, transparent, and time-bound harmonisation, both between and within EU Member States. As detailed in Table 3, key recommendations include:

- ▶ Enhancing public administration capacity through targeted investments in staffing, training, and inter-agency coordination.
- ▶ Replicating successful models, such as Germany's approach, to provide legal certainty for SMEs offering training-to-employment pathways.
- ▶ Prioritising language proficiency as a gateway to employment via MOUs and subsidised training.
- ▶ Sharing or subsidising translation costs currently borne by TCNs.
- ▶ Automating qualification recognition for regulated professions via EQF comparisons with select third countries.

The inclusive methodology followed for this report confirmed that LABOUR-INT's multi-stakeholder approach remains highly relevant. By grounding future analysis in lived implementation experience, policy lessons become more visible and actionable. Building on these insights, it is hoped that these recommendations will reach a wider audience to increase their real-world impact.

9.

▶ ANNEXES

9.1

LIST OF ORGANISATIONS, AGENCIES AND OTHER STAKEHOLDERS INTERVIEWED

Chambers of Commerce and Employer associations:

- ▶ Bulgarian Chamber of Commerce and Industry
- ▶ Confindustria Puglia
- ▶ OZS Slovenia
- ▶ PIMEC Spain
- ▶ SGI Europe
- ▶ WKOE Austria
- ▶ ZDH Germany

EU Institutions:

- ▶ Directorate-General for Migration and Home Affairs (DG HOME)
- ▶ Directorate-General for Employment, Social Affairs and Inclusion (DG EMPL)

Non-Governmental Organisations / Foundations:

- ▶ CARITAS Sofia, Bulgaria
- ▶ SMILE/ Fondazione Maierotti Puglia

Public Service:

- ▶ Employment Service of Slovenia (ZRSZ-ESS)

Third-Country Nationals living in Bulgaria, Poland and Slovenia:

- ▶ 16 in total, originally from Belarus, Iran, Russia, Syria and Ukraine
 - ▶ Twelve women, four men
 - ▶ Nine Refugees/Temporary Protection Holders, seven migrants

Trade Unions:

- ▶ CITUB, Bulgaria
- ▶ CGIL Italy
- ▶ ETUC
- ▶ OPZZ Poland
- ▶ The Association of Free Trade Unions of Slovenia (ZSSS)

Other stakeholders:

- ▶ FIERI Consulting (author of LABOUR-INT I and II research reports)

9.2

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**Co-funded by
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Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or DG HOME. Neither the European Union nor the granting authority can be held responsible for them.

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