

► **LABOUR-INT III:**

TOWARDS A MULTISTAKEHOLDER
APPROACH TO SKILLS MATCHING:
AN ASSESSMENT OF CURRENT
SKILLS-MATCHING PRACTICES FOR
THIRD-COUNTRY NATIONALS IN THE
EU LABOUR MARKET

► **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

AMIF	Asylum, Migration and Integration Fund
CEDEFOP	European Centre for the Development of Vocational Training
CIVGs	Centres for Information and Vocational Guidance
EaSI	Employment and Social Innovation
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
ESF+	European Social Fund Plus
EU	European Union
HR	Human Resources
IT	Information and Communications Technology
NARIC	National Recognition Information Centres
NAVET	National Agency for Vocational Education and Training
PES	Public Employment Services
SMEs	Small and Medium Enterprises
SRVCC	Sistema Regionale di Validazione e Certificazione delle Competenze
TCN	Third-Country National
VET	Vocational education and training

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1.

▶ **EXECUTIVE
SUMMARY**

Skills-matching can be defined as the extent to which skills are effectively matched with labour market demands¹. This assessment investigates the current landscape of skills-matching practices for integrating Third-Country Nationals (TCNs) regularly residing in the European Union (EU) into the labour market, with a particular focus on Bulgaria, Italy, Poland and Slovenia. Building on the recommendations and lessons from LABOUR-INT I and II, this report, produced as a contribution to the LABOUR-INT III project, examines opportunities and challenges in finding the right match between TCNs' skills and demands of the EU labour market. A bottom-up methodology was employed, gathering perspectives from TCNs, social partners, and policymakers at EU and country levels. The report analyses current practices in skills assessment and profiling, professional training, and job matching and placement of TCNs, and proposes a few guidelines and criteria to improve skills-matching practices across focus countries.

Although the EU has recently introduced measures to facilitate the admission of global talent, TCNs' access to the EU labour market remains limited to defined legal categories (such as Blue Card holders, intra-corporate transferees, student, researchers, etc.) and is still shaped to a significant extent by national rules and procedures. For most TCNs, particularly those in low- and medium-skilled occupations, there is no general EU-level right to move and work freely across Member States, beyond limited and temporary arrangements, such as seasonal work. As many of the TCNs interviewed observed, this remains a major obstacle to effective skills matching and labour market integration.

In the four focus countries, legal frameworks have evolved to address these challenges, albeit with varying degrees of effectiveness. Bulgaria's Labour Migration and Labour Mobility Act (LMLMA), first enacted in 2016 and amended in 2018 and 2023, consolidated and streamlined the country's approach to labour migration, aligning it with relevant EU directives and simplifying access for highly skilled TCNs. Italy's Unified Immigration Act, complemented by recent legislation such as Legislative Decree No. 20/2023 and Law No. 187/2024, has introduced mechanisms for skills-matching and expedited labour market entry. Poland's 2025 Act on the conditions of admissibility of entrusting work to foreigners in the territory of the Republic of Poland no longer requires employers to prove the absence of suitable local or EU candidates before hiring TCNs. Slovenia, through its Aliens Act and the Employment and Work of Aliens Act, both amended in 2025, has incorporated EU directives and established procedures for work permits and skills-matching.

Within the LABOUR-INT III project, each focus country is at a different stage of implementing labour market integration activities; therefore, skills-matching practices vary considerably. In Bulgaria and Slovenia, LABOUR-INT III focal points have already integrated project activities into their current work, whereas in Italy, SMILE Puglia is planning to implement skills-matching activities as of late 2025. OPZZ in Poland will continue to focus on language training of TCNs, with a view to strengthening coordination with other actors directly responsible for skills-matching at a later stage.

¹ CEDEFOP (2025) European skills index, available at <https://www.cedefop.europa.eu/en/tools/european-skills-index/skills-matching>.

Among the main challenges observed by national focal points in matching TCNs' skills with in-demand labour, there are perceived inconsistencies between EU policies and tools, such as the Returns Directive and the Talent Pool initiative (adopted by the European Parliament and the EU Council in March 2026 and currently under development). To some interviewees, they point in opposite directions, as the Returns Directive regulates TCNs' return to their home country while the Talent Pool encourages TCNs to leave it. National stakeholders, especially public administrations, would greatly benefit from clearer guidance on the vast, complex and fast-changing EU normative framework regulating TCN skills-matching. Compared to previous editions of the LABOUR-INT project, extensive consultations with country-level stakeholders reveal that many of the same legal, administrative, linguistic and cultural obstacles identified in earlier projects persist. These challenges raise questions about the barriers to operationalising previous recommendations in practice.

Proposed guidelines to improve current skills-matching practices in LABOUR-INT III focus countries underscore the importance of strengthening existing coordination mechanisms, clarifying institutional roles and enhancing collaboration across sectors and levels of governance. This approach can support a more integrated and responsive skills-matching system without adding unnecessary administrative layers. In addition, it is suggested to increase public administrations' capacity to support TCNs on their journey; promote early partnerships between learning

centres and prospective employers; encourage language learning and proficiency; engage diaspora communities to help authorities identify any hidden or additional job intermediaries, who may play a crucial role in TCN recruitment; and organise state or sector-led job fairs to provide a safe environment where TCNs and law-compliant employers can meet.

Section 6.2 includes the full list of proposed guidelines and recommendations to improve TCN skills-matching processes 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.

2.

INTRODUCTION

The objective of this report is to assess and enhance the alignment of skills of TCNs residing in the EU with the demands of the European labour market. The analysis is intentionally limited to migrants and refugees regularly residing in the EU, in recognition of the fact that, while migrants with irregular status significantly impact the labour market, their integration falls outside the scope of this study.

A bottom-up methodology was employed, gathering perspectives from TCNs, social and economic partners, and policymakers at EU and country levels. Data collection and analysis involved a desk review of key documents, in-depth discussions with the LABOUR-INT III Expert Group on Skills-Matching (EGSM), and semi-structured interviews with around 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. Due to their central role in the project, LABOUR-INT III 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 data availability and geographic scope for this report. Regarding skills-matching 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. National focal points in focus countries provided access to relevant data, however this information was not always available in English or concerned a relatively small TCN group. To compensate for these limitations, efforts were made to consult an adequate number of other relevant stakeholders, starting with TCNs themselves. Nevertheless, the recommendations included in this document should not be seen as representing the full spectrum of solutions to skills-matching challenges in the EU.²

² This assessment complements the findings from other reports produced within the framework of the LABOUR-INT3. In particular, it should be read in tandem with the report on the *Recognition of Regulated and non-Regulated Qualifications of Third-Country Nationals* (D2.1), which also addresses the issue of skills assessment and profiling, although for the different purpose of recognising TCN qualifications and validating their skills.

3.

▶ **BACKGROUND
AND CONTEXT**

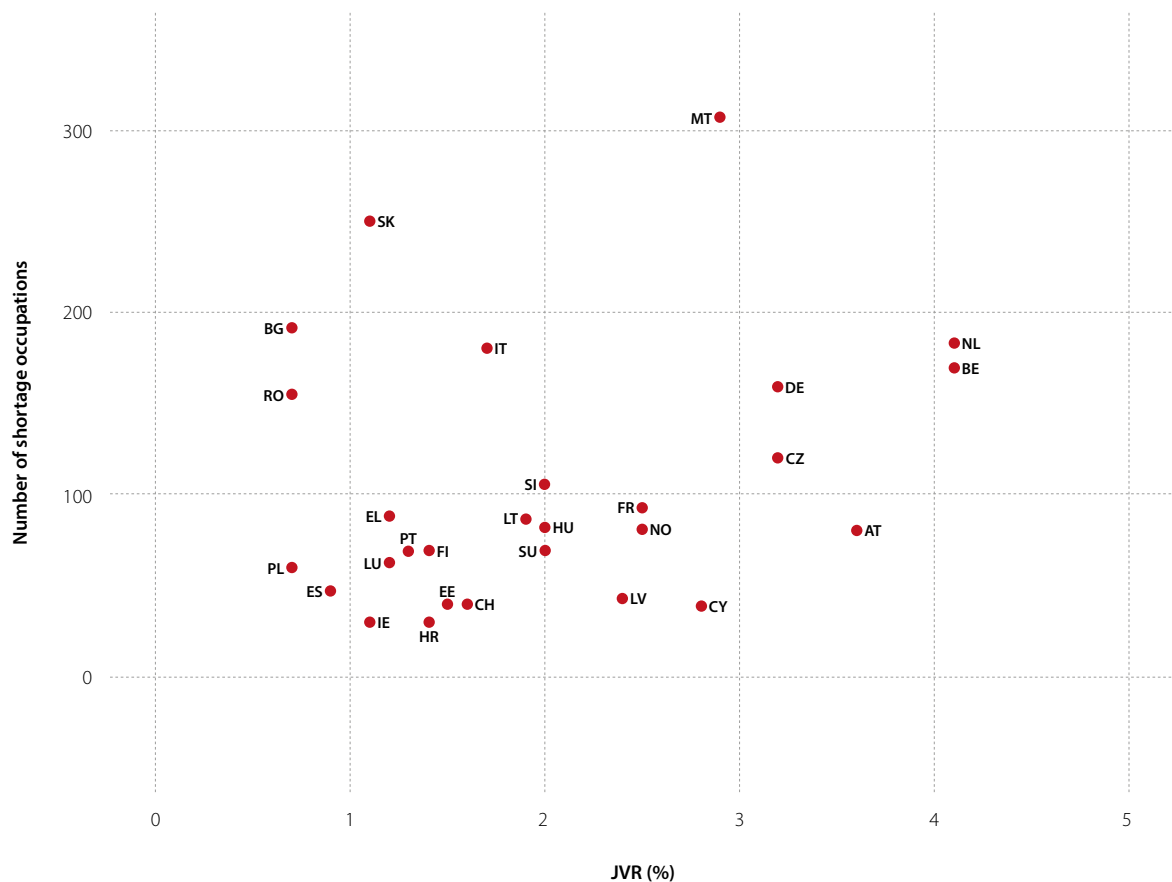
This section analyses the main EU-level legal frameworks and tools relevant to the labour market integration and skills-matching of TCNs, focusing on migrants with a regular permit and individuals with refugee status. It highlights the potential and limitations of these frameworks and examines the lessons learned from recent initiatives, such as the EU's response to the Ukrainian refugee crisis.

The EU has been facing persistent and growing labour shortages for over a decade (see Figure 1). In focus countries, shortages are particularly acute in agriculture, construction, tourism, transport and care services sectors. Contributing factors are demographic trends across the Union, such as aging populations and declining birth rates, which have intensified the need for a responsive and dynamic labour market. Through this lens, migrants and refugees from outside the EU offer a significant opportunity to address labour shortages. These demographic trends interact with a complex web of technological, economic, environmental, and social changes. Together, these factors underscore the urgent need for dynamic labour market reforms and policy adaptability across the EU. Indeed, despite increasing migratory pressures, EU employers continue to face significant difficulties in recruiting the workers they need. Small and Medium Enterprises (SMEs) are especially constrained when trying to hire talent from outside the EU. According to a 2023 European Commission Eurobarometer, more than three in four SMEs report difficulty finding workers with the right skills³. SMEs are more likely to rely on TCNs to fill low- to medium-skilled positions, but smaller firms are often less well equipped to navigate the administrative, legal and matching procedures involved⁴. Making progress on the recognition of third-country qualifications is therefore crucial, as it can help alleviate labour and skills shortages by enabling qualified workers to enter the workforce more quickly and effectively.

³ European Commission (2023) *European Year of Skills: Skills shortages, recruitment and retention strategies in small and medium-sized enterprises. Report*, Flash Eurobarometer 529, p. 13.

⁴ Di Pietro, G. (2024) *SMEs, skills shortages and third-country nationals*, Science for Policy Brief, Brussels: European Commission Joint Research Centre. <https://publications.jrc.ec.europa.eu/repository/handle/JRC139979>.

FIGURE 1.
NUMBER OF SHORTAGE OCCUPATIONS AND JOB VACANCY RATE (JVR) IN THE EU.



Source: European Labour Authority (2025).

In the four focus countries analysed in this assessment, labour shortages that TCNs can help fill are the following –

- ▶ **in Bulgaria:** 191 shortage occupations (see Figure 1), mainly in tourism and hospitality, construction and manufacturing, agriculture and food processing, IT, transport and logistics;
- ▶ **in Italy:** 180 shortage occupations, mainly in agriculture and seasonal harvesting, home care and health assistance, construction, and manufacturing and logistics;
- ▶ **in Poland:** 60 shortage occupations, mainly in manufacturing, construction and transport, and agriculture;
- ▶ **in Slovenia:** over 100 shortage occupations, mainly in construction, the mechanical and metal industry, automotive, manufacturing, hospitality and tourism, health and care services.

3.1

OVERVIEW OF EU AND NATIONAL LEGISLATION ON SKILLS-MATCHING FOR TCNs

Part of the mismatch between labour supply and demand is due to the complex legal and policy frameworks governing TCNs' integration into the European labour market. The EU Directive on long-term residence for third-country nationals (Council Directive 2003/109/EC) aims to grant non-EU citizens who have legally and continuously resided in an EU Member State for at least five years a status that offers rights similar to those of EU citizens, particularly in terms of residency, work, education, and social protection. These rights nevertheless remain subject to certain conditions and national implementation. In recent years, the EU has adopted other directives such as the recast Blue Card Directive (EU 2021/1883), the Intra-Corporate Transferees (ICT) Directive (2014/66), and the recast Single Permit Directive (2024/1233) to regulate the mobility of non-EU citizens. However, the first two Directives only target highly skilled workers⁵, who represent a relatively small proportion of TCNs entering the EU. Despite the Single Permit and Seasonal Workers Directives (2014/36), TCNs who could help address the EU's most acute labour shortages, especially in low- and medium-skilled jobs, still face significantly greater barriers to access than highly skilled workers. EU legislation provides only limited and category-specific intra-EU mobility rights for TCNs, rather than automatic free movement comparable to that of EU citizens⁶.

Similar patterns of a mismatch between labour demand and offer emerge at national level. For example, Bulgaria faces shortages in medical staff due to emigration, while Italy and Poland have acute needs in agriculture and hospitality. Each Member State retains significant control over access to its labour market for TCNs, except for specific categories. This national discretion is reflected in the legislative frameworks of LABOUR INT 3 focus countries. In particular:

► **In Bulgaria:** The Labour Migration and Labour Mobility Act (LMLMA) of 2016, amended in 2018 and 2023, consolidated Bulgaria's approach to labour migration, harmonising it with EU directives. The 2018 amendments expanded access for TCNs of Bulgarian origin and increased hiring quotas for non-EU nationals, while the 2023 amendments simplified access for highly-skilled TCNs, especially for the EU Blue Card, and aligned the law with Directive (EU) 2021/1883. The LMLMA requires a labour market test, recognition of third-country qualifications, and sets out procedures for work permits and equal treatment. LMLMA explicitly integrates mechanisms for skills assessment and recognition of foreign qualifications. Its Article 16 and related sections empower the Employment Agency to assess qualifications, professional experience, and competencies when granting work permits. The Act also mandates cooperation between the Ministry of Labour and Social Policy and the Ministry of Education and Science for recognising qualifications obtained abroad. By linking employment permits to recognised qualifications, the Bulgarian system supports both skills matching and labour market integration.

► **In Italy:** The Unified Immigration Act (1998) remains the foundational law, but recent updates – mainly, Law No. 187/2024 and Legislative Decree No. 20/2023 – have introduced urgent provisions to streamline the entry of foreign workers, including mechanisms for skills-matching and a computerised registry for non-EU workers' skills. The registry, mandated by Article 21 of the Unified Act, is designed to match migrant skills with labour market needs before arrival, and the 2023 decree allows eligible TCNs to begin work immediately upon receiving a permit and visa. The digital registry supplements the annual 'Flow Decree', which determines the number and types of work permits for non-EU nationals based on anticipated labour market needs. However, to date, there is no evidence that the registry is being widely used.

⁵ This is explicitly stated as an objective by the European Commission, see https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-resettlement/work/eu-blue-card-attracting-highly-qualified-talent-eu_en and https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-resettlement/work/intra-corporate-transfers-directive_en.

⁶ See European Commission (2023) *Impact Assessment Report. Accompanying the Document: Proposal for a Regulation for the European Parliament and the Council establishing an EU Talent Pool*, Brussels: SWD (2023) 717 final; De Lange, T. and Groenendijk, K. (2021) *The EU's legal migration acquis: Patching up the patchwork*, Brussels: European Policy Centre.

- **In Poland:** The Act of 20 March 2025 on the conditions of admissibility of entrusting work to foreigners in the territory of the Republic of Poland is a new legal framework regarding the employment of TCNs. The Act abandons the principle of complementarity, requiring employers to prove no suitable local or EU candidate is available before hiring a TCN. Rather, the Act provides a legal framework for forecasting labour market needs and for recognising the professional experience obtained abroad, coordinated through the Minister of Family, Labour and Social Policy. Amendments introduced digital tools for verifying and recording migrants' competences to improve job matching and reduce mismatches in shortage sectors.
- **In Slovenia:** The Aliens Act (ZTuj-2, 2011, last amended 2025) and the Employment, Self-Employment and Work of Foreigners Act (ZZSDT, 2015, last amended 2025) establish the framework for issuing the single residence and work permit for foreign nationals, including TCNs and incorporate EU directives such as the Single Permit Directive and Blue Card Directive. These laws outline specific procedures for work permits, skills-matching, and recognition of qualifications.

3.2

EU AND NATIONAL SKILLS-MATCHING INITIATIVES AND TOOLS FOR TCNs IN FOCUS COUNTRIES

The EC has taken steps to identify and match TCN talent with in-demand jobs. On a broader level, the Commission named 2023 the European Year of Skills to address skills shortages, promote investment in training and upskilling and lifelong learning for quality jobs, particularly in the context of digital and green transitions. Through a range of initiatives tailored for the general public, including the Pact for Skills, the Digital Skills and Jobs Platform and funding programs, the campaign fostered lifelong learning, supported SMEs, and generated new momentum to reach the EU 2030 social targets. While these initiatives helped build momentum towards improved TCN skills-matching, they did not specifically target TCNs.

Through over 30 initiatives on education and training, the 2025 Union of Skills aims to establish a cohesive framework for qualification recognition and skills development, with the objective of creating a resilient and adaptable workforce ready to meet the current demands of the EU labour market. Both European Year of Skills and the Union of Skills aim to make it easier and faster for workers to gain access to quality jobs that match their qualifications, in recognition of the need for the EU to attract skilled workers beyond its borders. The target population includes TCNs, for example, through the Union of Skills external action stream, although this seems designed to attract mainly highly skilled workers

(‘top talent’, according to the official description⁷). Of note is also the establishment of European observatories to monitor, analyse and anticipate the skills needs across different sectors and regions in Europe. These observatories are meant to promote the mobility of skilled labour across the continent and will become operational through a phased approach.

More concretely, the EU 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, trade unions and other national authorities and it is generally meant for an introductory conversation between TCNs and their first national contact. On average, however, project partners find the EU Skills Profile Tool quite cumbersome and time-consuming. This feedback explains the tool's limited adoption at the country level.

A more targeted skills-matching tool is the EU Talent Pool. Currently expected to become operational by the end of 2027 (according to secondary sources⁸), this initiative will be an EU-wide online platform designed to connect TCNs living outside the EU directly with EU employers experiencing labour shortages. It is important to note that

⁷ See https://commission.europa.eu/topics/competitiveness/union-skills_en.

⁸ See <https://www.visahq.com/news/2026-03-31/ie/eu-council-formally-adopts-talent-pool-regulation-irish-employers-eye-new-channel-for-skilled-recruitment/>.

the Talent Pool does not target TCNs already residing in the EU, who are the focus of this study. The online platform will match job vacancies of employers established in the EU with the profiles of non-EU jobseekers residing outside of the EU. Jobseekers from outside the EU will be able to create a profile on the EU Talent Pool platform and provide information about their skills, qualifications, work experience and language skills. The right of entry into the EU and the issuance of a residence permit are not regulated by the EU Talent Pool regulation. Jobseekers who receive an offer must still follow national immigration procedures. The platform will provide clear information on visas, work permits and the conditions required. For employers, especially SMEs, the Talent Pool can help identify and recruit qualified candidates more efficiently, thus addressing persistent skill gaps across sectors. At the time of writing, the EU Talent Pool cannot be adapted to TCNs already residing in the Union – the target group of the LABOUR-INT III project – due to their different legal status. However, a Talent Pool Pilot has been tested in 2022-24 to match Ukrainian Temporary Protection holders with EU job opportunities. While there has not been an official evaluation of the Pilot, many stakeholders interviewed for this document did not think it had been a successful experiment due to its limited use at the country level.

The EU also provides a variety of funding tools to improve skills validation, training accessibility and employment opportunities for TCNs. Among the main initiatives, the Asylum, Migration and Integration Fund (AMIF) supports skills-matching, professional training and labour market integration through projects like digital skills training for migrants' employment⁹. The European Social Fund Plus (ESF+) complements national and regional initiatives to improve TCN employability and social inclusion. As a dedicated ESF+ component, the Employment and Social Innovation (EaSI) strand funds pilot projects, such as support for social economy organisations aiding long-term unemployed TCNs through vocational training and work placements. Erasmus+, which allows both EU and non-EU participants to benefit from skills-building and social inclusion, supports vocational training, adult learning, mobility projects and partnerships between education and social actors engaged in migrant integration. For high-skilled workers, Horizon Europe funds research and innovation projects and data-driven skills-matching.

⁹ As detailed, for example, in the 2025 AMIF Call for Proposals: https://www.euro-access.eu/_media/file/795_call-fiche_amif-2025-tf2-ag-inte_en.pdf.

4.

► **CURRENT SKILLS-MATCHING PRACTICES IN LABOUR-INT III FOCUS COUNTRIES**

This section differs from the previous one in that it transitions from a review of EU and national policy frameworks on TCN-skills matching to an overview of the main practices used in LABOUR-INT III focus countries to match the most in-demand skills with TCNs' talent. It then describes opportunities and challenges faced by national focal points and other relevant project partners throughout the skills-matching process.

In line with previous LABOUR-INT reports, skills-matching encompasses the following steps in TCN labour market integration: skills assessment and profiling, professional development and training, and matching and placement. This report covers all three stages, with a more specific focus on the latter two.¹⁰

Each focus country has a central labour or employment authority responsible for skills matching of TCNs, often working in collaboration with education ministries, sectoral ministries, universities and professional chambers, especially for regulated professions. In practice, coordination arrangements differ from country to country. **Bulgaria's system** involves the Ministry of Labour and Social Policy, the National Employment Agency, the National Agency for Vocational Education and Training (NAVET) and an inter-ministerial cooperation with other ministries. Bulgaria relies on national employer surveys, sector-specific consultations and roundtables to communicate its foreign labour needs through the National Employment Agency. The Agency then uses the data to develop forecasts, deliver vocational training programmes and issue work permits for TCNs after ensuring no local alternative exists.¹¹

The **Italian system** centralises its demand for foreign labour through its annual migration quotas decree (Decreto Flussi), which is used as the main planning tool. The decree is based on data collected by regional employment centres and employer associations. It is updated annually following consultations with unions and regional labour agencies. In addition, the Ministry of Labour and the Italian Union of Chambers of Commerce (Unioncamere) have developed the Excelsior information system, which publishes regular labour market forecasts and skills needs at national and regional levels. However, this system is not used for TCN skills-matching purposes. It is worth noting that Article 23 of Italy's Unified Immigration Act assigns each region a significant role in TCN skills-matching, with regional authorities tasked to implement active labour market policies, vocational training, and integration pathways tailored to local needs.

In **Poland**, employers submit 'Statements of Intent to Employ a Foreign Worker' to a national registry. The government regularly publishes shortage occupation lists to streamline visa and permit issuance for targeted sectors. Since 2025, Poland has integrated these forecasts into a Labour Market Observatory and has cooperated with EU skills networks to anticipate trends and shifts. Overall, this system prioritises administrative facilitation over direct skills-matching for TCNs.

Slovenia communicates its foreign labour needs through its Employment Service (ESS-ZRSZ), which plays an important administrative and intermediary role. It issues consent for employment and verifies labour market conditions, particularly regarding the availability of suitable domestic candidates and compliance with legal employment requirements. ESS-ZRSZ's role is primarily related to administrative assessment of employment conditions and support for labour market integration. Within the framework of active labour market policy, ESS-ZRSZ may implement or co-finance various training, reskilling, and employability enhancement programmes. These measures do not constitute a formal qualification recognition system, but rather labour market instruments aimed at improving the competencies of job seekers. Employers must declare labour shortages via the PES database before recruiting non-EU workers. Data are then consolidated by the Ministry of Labour, Family, Social Affairs and Equal Opportunities, which maintains updated shortage sector lists.

Table 1 summarises current responsibilities for skills-matching of TCNs in each focus country, along with practices followed by relevant lead agencies. It also lists other official stakeholders influencing the process. These lists are not exhaustive as there may be unknown actors involved in skills-matching, for example, private recruitment agencies or other intermediaries.

¹⁰ On the recognition of TCN qualifications, please refer to the *Report on the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*, also produced as part of the LABOUR-INT III project.

¹¹ See https://home-affairs.ec.europa.eu/policies/migration-and-asylum/eu-immigration-portal/employed-worker-bulgaria_en.

TABLE 1.
NATIONAL AUTHORITIES RESPONSIBLE FOR SKILLS-MATCHING OF TCNs IN FOCUS COUNTRIES

Focus Country	National authorities responsible for TCNs' skills-matching	Main responsibilities
Bulgaria	- Ministry of Labour and Social Policy (MLSP) - Ministry of Education - National Employment Agency - National Agency for Vocational Education and Training (NAVET)	- Compliance with legislative framework, overall coordination and funding of skills anticipation and matching - Funding of VET programmes - labour market analyses, forecasts and skills-matching - Oversees VET providers and programmes, supervises skills anticipation for VET; liaises with the Ministry of Education and Science and the Ministry of Economy on VET standards and professions
Italy	- Ministry of Labour and Social Policies in collaboration with the in-house company Sviluppo Lavoro Italia - Public Employment Services - Line ministries - Regional Administrations	- Coordinates skills matching and labour market integration ensures policy oversight - Operational job and skills matching for TCNs - Skills-matching for regulated professions - Coordinate and fund professional training leading to professional qualification recognition (Regional Repertoires of Occupational Profiles)
Poland	- Ministry of Family, Labour and Social Policy - Labour Offices and Public Employment Services - Line ministries and Chambers of Commerce	- Main authority for labour market and skills matching - Regional and local implementation of labour policies - Skills-matching for regulated professions
Slovenia	- Employment Service of Slovenia (ESS) - Ministry of Labour, Family, Social Affairs and Equal Opportunities - Line ministries and authorised educational institutions	- Main public authority for skills matching and labour market integration - Policy oversight - Skills-matching for regulated professions

Drawing on previous LABOUR-INT reports, matching TCNs' skills with in-demand job opportunities in focus countries encompasses three main steps: skills assessment¹², professional development (including certified, vocational and other non-formal and informal forms of skills acquisition)

and the actual job matching and placement. LABOUR-INT III project partners contribute to either some or all these steps, to varying degrees. Table 2 below clarifies their role in the skills-matching process, either within or outside the LABOUR-INT III project.

TABLE 2.
LABOUR-INT III PROJECT PARTNERS' ROLE IN SKILLS-MATCHING FOR TCNs IN FOCUS COUNTRIES

Focus country and partner	Project partners' contribution to TCNs' decent employment conditions within and/or outside the LABOUR-INT III project			
	Skills assessment	Professional development (certified, vocational, etc.)	Job matching and placement	Other contribution
Bulgaria				
CARITAS Sofia	x	x	x	Provision of skills assessment, referrals to other licensed VET providers, and systematic follow-up on participants' progress
CITUB		x		
Italy				
SMILE Puglia	x	x		
Poland				
OPZZ				Provides institutional opinions on drafts of legal acts and strategy documents
Slovenia				
ZRSZ	x	x	x	Skills assessment and professional development are delivered by authorised subcontractors
ZSSS				

¹² Skills assessment and profiling is also part of the process of recognising TCN qualifications and/or validating their skills. It is therefore also addressed in the LABOUR-INT III document *Report on the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*.

In addition to the skills-matching procedures summarised in Tables 1 and 2 above, national authorities and LABOUR-INT III focal points have adopted the following practices in TCN skills assessment, training, matching and placement:

In Bulgaria, NAVET collaborates with the Centres for Information and Vocational Guidance (CIVGs) to assess TCNs' skills. However, there are no specific linkages between labour shortages in the country and TCN skills-matching policies. This gap may have important implications for TCN labour market integration, particularly since relevant stakeholders interviewed for this study are not directly involved in skills-matching activities, such as referrals or job placements. CARITAS Sofia provides orientation, language and VET training, skills assessment, direct referrals of TCNs to employers and follow-up after their job placement. In addition, the Confederation of Bulgarian Trade Unions (CITUB) organises training for TCNs in key competency areas, including language and computer skills. The Confederation has also established several vocational training groups.

In Italy, local agencies like the CPIA (Centres for Adult Education) and regional authorities work together to ensure that TCNs' skillsets are correctly represented. PES collaborate with employer associations like Confindustria and trade unions to implement the annual Flows Decree assigning TCN quotas to specific sectors experiencing labour shortages. Employers are directly involved in assessing TCN skills for non-regulated professions, as well as in job matching and placement. In autumn 2025, SMILE, in collaboration with trade union CGIL, profiled 44 TCNs for a pilot language and skills-training project, with a view to matching these TCNs with potential employers at a later stage.

In Poland, national authorities and social partners have worked together to define a national list of shortage occupations. In recent years, this collaboration has resulted in an increase in the number of work permits issued to TCNs in some specific sectors. The Polish Public Employment Services or PES is the key agency for matching labour supply and demand. Poland requires PES to maintain a central job-matching database and conduct skills assessments for jobseekers, including TCNs lawfully resident in Poland. In terms of service delivery, the trade union OPZZ provides language training to TCNs, many of whom are Ukrainian nationals. It also offers labour market orientation courses on how various aspects of the Polish labour market function. They do not play a formal role in subsequent steps of the skills-matching process.

Similarly, **in Slovenia,** PES (ESS) collaborates on lists of exemptions directly with the Ministry of Labour. The most in-demand jobs that cannot be filled with local workers are accessible to foreigners and do not require labour market control. The central office dispatches TCN profiles directly to potential employers. In addition, ESS plays an integrated role by providing language training, orientation and support to TCNs for their inclusion in the labour market. ESS also cooperates with the Public Institution Center of the Republic of Slovenia for Vocational Education (CPI).

5.

► **SKILLS-MATCHING OPPORTUNITIES AND CHALLENGES AT THE COUNTRY LEVEL**

For TCNs with a regular work permit, particularly those with low or medium skills, skills-matching opportunities and challenges can be grouped around four recurring issues: 1) information about skills-matching options and tracking of potential candidates 2) legal and administrative procedures 3) language and culture of the host country and 4) age/gender/disability factors and other variables, such as structural discrimination. These issues, which are prioritised here based on stakeholder consultations, feature prominently in all focus countries and in other stages of TCNs' integration process as well.

5.1

INFORMATION ABOUT SKILLS-MATCHING OPTIONS AND IDENTIFICATION OF POTENTIAL CANDIDATES

Providing timely, accurate, and accessible information on in-demand jobs remains challenging due to gaps in data quality, timing, and tracking systems.

5.1.1

Quality of the information provided

Rapidly changing EU and national regulations make it difficult for public officials, employers, and TCNs to access and interpret relevant information. For example, in Slovenia, public officials are struggling to keep up to date with frequent legislative changes regarding TCNs' access to the EU labour market. Data on TCN status, work rights, and qualifications is often fragmented and poorly tailored to recruitment needs, especially for SMEs. While Temporary Protection simplifies access for Ukrainian nationals, albeit for a limited period, the rules for other TCNs are more complex and unclear. What seems to be working well is assigning a focal-point role to the most experienced staff available to draw on their individual knowledge and employer contacts. However, this approach may not be sustainable in the long term due to staff turnover and lack of institutional memory (#1, #2).

5.1.2

Timing of the information provided

Early access to employment guidance - typically via Welcoming Services - is critical but often delayed¹³. This gap is a weak point in the skills-matching chain: under time pressure to secure their livelihoods, TCNs may turn to informal or unreliable sources, which increases the risk of exposure to misinformation, disinformation and exploitative work. Evidence from Apulia shows many TCNs enter informal employment before understanding formal pathways, a pattern echoed across countries, based on stakeholder interviews (#3, #8).

5.1.3

TCN data collection and tracking

Inconsistent referral procedures and limited data sharing make it difficult to track TCNs and match them with jobs that leverage their actual skills. Informal employment, mobility, visa changes, or fear of authorities can lead TCNs to 'disappear' from official systems. Employers may also hesitate to hire candidates with unclear work histories. It is unclear how these cases are tracked in focus countries, whether any good practices exist to address them or if they simply fall off the radar of skills-matching opportunities. They would deserve further research (#2).

5.2

LEGAL AND ADMINISTRATIVE PROCEDURES

As described in section 3.1, national legislation in each focus country provides the legal foundation for skills-matching practices. Nevertheless, legal barriers to effective implementation remain in all focus countries due to challenges in ensuring consistency between EU and national legislation. In Bulgaria, a working group within the Council of Ministers has been established to bring together

key stakeholders, including Chambers of Commerce, and find solutions to skills-matching. In Poland, migration policies which give TCNs access to the labour market are weakly linked to skills-matching processes. This is because the government primarily offers TCNs 'bridging course' focused on learning Polish language skills. Vocational skills development, on the other hand, is offered less regularly,

¹³ For a deeper analysis of this trend, please refer to the *Guidelines on how to systematise the services of welcoming services for refugees and migrants* produced as part of the LABOUR-INT III project.

which limits TCNs' ability to acquire new skills and access the Polish labour market. Italy's abovementioned computerised registry aims to match migrant skills with labour market needs before arrival. However, lengthy administrative procedures undermine its effectiveness, contributing to high rates of irregularity. According to CGIL representatives interviewed for this study, in Apulia, around 80% of TCNs fall into irregular status within eight days of their arrival due to legal loopholes. This is because work permits are linked to residence permits and TCNs only have eight days to find a job upon their arrival, unless they have already secured an employment contract before their departure for Italy. This type of legislation leads to three negative consequences: it puts migrants in irregular situations almost immediately; it weakens TCN workers' negotiating power as they struggle to find any job to avoid losing their residence permit; and it incentivises the growth of parallel job markets, such as the 'gangmaster' system (caporalato), by organised crime (#3, #18, #19).

5.2.1

Administrative barriers

Key informants consulted for this report are acutely aware of the need to support skills-matching initiatives in focus countries. Employer associations in particular have been experimenting with innovative solutions to see if they can be replicated and scaled up. At the same time, findings from stakeholder consultations underscore the persistence of administrative complexity and lengthy paperwork. For example, Slovenia's alignment with EU directives are designed to ensure that TCNs are only hired when no suitable local or EU candidates are available. In practice, this process can be slow and cumbersome due to excessive legal and bureaucratic requirements. Similarly, in Bulgaria, administrative backlog can delay the hiring process for months even when skills-matching is part of official bilateral agreements with non-EU countries. This is particularly the case for workforce recruited from abroad. In one instance, in March 2024, a few Bulgarian employers had successfully identified a group of Indian nationals for hire through a bilateral scheme led by the Bulgarian Chamber of Commerce. However, they later learned that the earliest the embassy of their origin country in Sofia (India) could process this group hire would be at the end of the year. This type of delays acts as a significant barrier to hiring TCNs. On the other hand, recruitment procedures for TCNs already residing in Bulgaria are usually simpler (#2, #3).

Besides the need to facilitate skills-matching procedures themselves, there are broader challenges related to the limited capacity of relevant public administration offices in focus countries. To start, often PES officials struggle to process TCN cases within a reasonable time frame due to understaffing. Each TCN case is different and requires in-depth analysis to identify the most suitable solutions for both the TCN and their potential employer. In addition, the recognition of TCN qualifications may take longer than foreseen, particularly if it involves recognising non-regulated qualifications¹⁴. In this regard, effective coordination with other public administration offices is essential to expedite the skills-matching process. In fact, recurring changes in EU and national legislation hamper coordination efforts at administrative level as it takes time to adjust to the evolving normative framework and reorganise the bureaucratic process accordingly in all focus countries (#1).

Evidence from Apulia, Italy, suggests that employers tend to appreciate the opportunity to hire TCNs for their strong motivation to learn and work. However, too often employers find local authorities take an inconsistent approach to matching labour demand and offer from one district to the next. In their view, this lack of coordination significantly slows down the skills-matching process. For regulated professions, one solution to reduce administrative delays is to support ongoing efforts to develop Common Training Frameworks for sector-specific work. These principles would help simplify skills validation and facilitate TCNs' integration into the labour market (#1, #15).

¹⁴ For a detailed analysis of this point, please refer to the *Report on the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*, also produced as part of the LABOUR-INT III project.

5.3

▶ **HOST COUNTRY LANGUAGE AND CULTURE**

Language plays a major role in matching TCN skills with jobs across all four focus countries. Based on interviews with TCNs themselves, it is one of the main reasons why many of them opt for low-skilled and low-paid jobs when they arrive in the EU. Indeed, if TCNs do not feel they know the language of their host country well enough, they will prefer to work in roles that require little or no interaction with people in the new language, even if they are otherwise over-qualified for the job. According to trade union representatives, these roles are likely to be in factories or warehouses. They often create dissatisfaction with highly educated TCNs, who aspire to enter the labour market in their destination country at a similar level to what they had in their home country. This level of frustration is particularly pronounced among Ukrainian nationals interviewed for this study, who expect higher wages for their knowledge and experience than their employers are willing to pay.

On their part, stakeholder interviews revealed that employers tend to screen candidates based on their ability to speak the host country language. If under pressure to hire for specific roles, some employers may choose to recruit TCNs who are at least able to speak a *lingua franca* like English. Nevertheless, anecdotal evidence suggests that this compromise solution is usually short-lived since employers prefer to revert to their mother tongue eventually and expect their employees to learn it fast (#9, #10, #11).

Language training is an essential part of TCN orientation in focus countries, however it remains largely inadequate to labour market demands. Most TCNs can only attend courses up to A2 level, below what is needed for quality employment. This affects job applications and employer perceptions, especially among SMEs with limited training capacity. For example, some TCNs in Slovenia feel constrained by their inability to send out CVs in Slovenian, although they appreciate the support they get from Welcoming Services representatives. A CV in English implicitly conveys the message that the TCN is not familiar with the local language and may require additional support from future employers compared to native speakers. This impression alone may

discourage prospective employers from hiring TCNs. To address this challenge, employer associations consulted for this study advocate for funding (e.g. ESF+) to support language and integration training (#14).

Language acquisition also varies significantly. Ukrainian nationals often adapt faster than Arabic-speaking TCNs, who face structural linguistic barriers to learning European languages. This can prolong unemployment or push individuals into informal work.

Occupational language requirements pose additional barriers, particularly in sectors such as healthcare and technology (#11). Cultural orientation also plays a crucial role in assisting both TCNs and employers through the skills-matching process. Orientation sessions help TCNs to 'think differently', as one interviewee from Bulgaria shared, and overcome cultural barriers that may prevent refugees and migrants from performing on the job as well as they could. This is particularly the case for non-Ukrainian nationals, who may be less familiar with European culture and ways of working. Employers, too, need to be sensitised about how to interact with TCNs in the workplace. Despite growing labour shortages, some employers may be hesitant to hire qualified TCNs from different cultural backgrounds, as noted by an interviewee from Italy. Stakeholder consultations suggest that Ukrainian nationals may be perceived to be a safer choice than other TCNs because of their European background and often higher educational level. Although these perceptions cannot be generalised, they point to potential blind spots in current skills-matching schemes¹⁵.

¹⁵ For a more detailed analysis of these issues, please refer to the other LABOUR-INT III reports *Guidelines on how to systematise the services of welcoming services* and *Guidelines for public employment services on developing programmes for migrant integration*.

5.4

OTHER FACTORS IMPACTING SKILLS-MATCHING PRACTICES

Other less visible, but equally important, factors impact skills-matching practices in focus countries. They can be grouped around age, gender, family status and disability factors, and may be mutually reinforcing¹⁶. These factors point to the hidden potential of several TCN groups to fill in-demand jobs, with due consideration to their specific profiles. In particular, some senior TCNs (65+ years) may want to either resume or continue working. Based on their actual health condition, they could be considered for hiring. Similarly, TCNs with light disabilities could be employed for specific roles with customised skills training. Many female TCNs who are currently unable to work due to family obligations would be a good match for a variety of hybrid/remote jobs or roles in the health sector or as at-home caregivers if they could rely on childcare support.

Additional challenges include qualification recognition, employer bias, weak professional networks, and digital exclusion. Addressing these requires a holistic approach that integrates economic conditions, mobility, career guidance, and psychosocial support for TCNs. On their part, employers request support, as they bear a significant part of the responsibility for integrating TCNs into the workforce. More coordinated, evidence-based policies are needed to create inclusive and effective labour market pathways for TCNs.

¹⁶ The LABOUR-INT III document *Guidelines for public employment services on developing programmes for migrant integration* analyses these factors in detail and provides specific recommendations.

6.

▶ KEY ELEMENTS TO IMPROVE SKILLS-MATCHING PRACTICES FOR TCNs

This section draws on recommendations from past LABOUR-INT editions and the insights from LABOUR-INT III stakeholders analysed above to distil key elements for improved skills-matching practices for TCNs in the EU. It then provides a set of guidelines for country-level stakeholders, specifically focusing on skills alignment and TCN placement¹⁷. As the present report focuses on a limited number of focus countries and stakeholders, these recommendations should be read as operational suggestions rather than broadly applicable conclusions.

¹⁷ Recommendations on preliminary stages in the skills-matching process, such as TCN skills assessment, profiling and development, can be found in the *Report on the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*.

6.1

▶ LESSONS LEARNED SO FAR

The first two LABOUR-INT editions produced a wealth of knowledge which remains highly relevant to current skills-matching practices and to LABOUR-INT III efforts more broadly. In fact, most recommendations from previous LABOUR-INT reports strongly align with feedback from current stakeholder consultations (see Annex 9.2). Recurring suggestions from the three LABOUR-INT editions include the following:

- ▶ **Skills-matching requires holistic and coordinated approaches.** There has been growing recognition that, while skills-matching tends to attract the most attention, especially from employers, it is the result of a combination of interventions within and beyond the workplace. For skills-matching to be successful, TCNs need to be able to rely on a comprehensive set of support measures from a variety of actors working in coordination, particularly PES, trade unions and employers.
- ▶ **EU and national labour legislation must be compatible and coherent.** On a national level, there needs to be higher coherence among migration, education and professional training policies in all focus countries. In addition, national stakeholders need clearer guidance on how to apply EU directives and tools at the country level. Regular training should be provided for public administration officials and partners to update them on the latest legislative and policy changes. Ideally, this training would be combined with English language courses to support national partners in their interaction with TCNs, many of whom do not speak the local language but only English.
- ▶ **There is no-one-size-fits-all model.** Each focus country presents a unique legislative, administrative, cultural and social environment, which impacts skills-matching practices. Effective solutions must be context-specific and, to the extent possible, customised to each TCN's situation. For example, options can significantly vary if a TCN benefits from Temporary Protection Status or has a disability. Flexibility in adapting to individual circumstances is essential and should be prioritised in policy design and service delivery.
- ▶ **Early 'pre-job' assistance can be a game-changer.** Conducting skills assessments and providing orientation upon TCNs' arrival can greatly help prevent their dispersion and irregular employment. Taking these preliminary steps as soon as possible paves the way for more effective intervention by PES, increasing the chances of successfully matching TCNs with in-demand jobs. On the other hand, providing 'pre-job' assistance to TCNs already residing in EU countries requires a more nuanced approach, depending on their individual profiles and background.
- ▶ **There is a need to agree on a common system to monitor progress in skills-matching.** Recurring opportunities and challenges from previous and current LABOUR-INT projects highlight key dimensions of progress in matching TCNs with in-demand jobs across focus countries. While national context matters greatly, agreeing on a few common criteria could help establish comparable baselines and monitor progress across the Union over time. A common EU skills-matching system can improve TCNs' labour market integration, if it is designed with rights at the center. This means embedding legal protections, data rights, transparency, inclusive design, non-discrimination, access to remedies and fairness safeguards from the start. A rights-based system would not only protect TCNs but make the whole skills-matching process more accurate, trusted, and effective.

6.2

PROPOSED GUIDELINES FOR MORE EFFECTIVE SKILLS-MATCHING IN FOCUS COUNTRIES

In light of stakeholder consultations and the practices and lessons learned above, this section proposes a number of guidelines to improve the assessment, training and matching of TCNs' skills across focus countries, and potentially the EU. General recommendations include, amongst others:

- ▶ **Strengthening existing coordination mechanisms** to disseminate information and dispatch TCN requests related to the skills-matching process in each focus country. Where such coordination mechanisms are absent, establishing 'one-stop-shops' for information and dispatching can address coordination gaps. These steps would help clarify responsibilities and timelines to relevant project partners. They would also improve how information is shared, reducing administrative burden and simplifying complex rules and regulations for the ultimate users – both TCNs and employers;
- ▶ **Increasing the staffing and resources of public administration offices** to support their skills-matching efforts. This step would help reduce average processing times and therefore, the risk that TCNs might be overqualified or disappear from the formal labour market if they cannot find a job quickly;
- ▶ **Engaging with relevant diaspora communities in the host country.** Not only is this step essential to supporting TCNs' overall integration in their new country, it is also helpful to gain a better understanding of whether other job intermediaries are engaging with TCNs. Some interviewees for this report suggested that TCNs may end up working for their fellow citizens under exploitative circumstances or without any concrete opportunity to access the formal labour market¹⁸.

TABLE 3.
SUMMARY OF PROPOSED GUIDELINES TO IMPROVE THE ASSESSMENT, TRAINING AND MATCHING OF TCNs' SKILLS AND QUALIFICATIONS IN BULGARIA, ITALY, POLAND AND SLOVENIA

	Proposed guideline	Who should act?	Expected result
General recommendations			
1	Strengthen existing coordination mechanisms or establish 'one-stop shops' for TCN labour market integration in each country	• Central government • PES leadership	Improved coordination and information dissemination among public administration departments on skills-matching
2	Increase the capacity of public administration offices supporting TCNs throughout the skills-matching process; improve English language skills of public officials; invest in adequate TCN data tracking and monitoring systems	• National authorities • Public administration leadership	More human, technical and financial resources are available to relevant offices to process TCN cases more efficiently and reduce the risk of dispersion or mismatches

¹⁸ This issue is analysed more in detail in other LABOUR-INT III documents, such as the *Roadmap to ensure decent employment conditions for migrants* and the *Guidelines for public employment services on developing programmes for migrant integration*.

	Proposed guideline	Who should act?	Expected result
3	Simplify procedures, improve timelines and support training efforts to facilitate employer participation in skills-matching of TCNs.	• European Commission • National authorities	Increased employer participation in recruitment, training and placement of TCNs; more efficient and predictable skills-matching processes; improved job retention
4	Improve how TCN labour needs are communicated at national and EU level, drawing on timely labour market intelligence and sectoral forecasts developed in cooperation with employer organisations	• National and regional authorities within EU countries • European Labour Authority	More timely information on labour needs and trends across the Union
5	Engage relevant diaspora communities from the outset to help their fellow TCNs with referrals and job placements	• Welcoming Services • PES	More information on other job intermediaries interested in TCNs; securing support in skills-matching efforts through additional contacts and prospects; higher protection for TCNs
6	Develop a basic set of monitoring indicators to track and compare progress across countries	• EC • National Coordinators	Establish an official baseline; compare TCNs' progress across the Union
Skills and qualifications assessment			
7	Ensure certificates are recognised by the state and comparable to those issued to host country citizens	• National authorities • Language schools	Reduced risk of TCNs being discriminated against for not having state-recognised language certificates
8	Promote practical and work-based assessment methods, (such as job trials, apprenticeships and short work-based validation pathways) particularly for non-regulated professions		Faster and more realistic assessment of TCNs' competences; better matching between actual skills and job requirements; lower risk of underemployment
Professional development and training			
9	Establish partnerships between language schools and employer associations on language training and testing	• Language schools • Training centres • Employer associations	Identify the best language speakers for further testing and apprenticeships
10	Make language learning more compatible with working hours	• Language schools • Employer associations • Social partners	TCNs can learn the language more easily while working; employers feel more encouraged to invest in TCNs' training
11	Provide occupational language training	• Social partners • Employer associations	TCNs more easily acquire the sector-specific language skills they need to improve their job performance
12	Strengthen public schools' capacity to pilot innovative skills-matching partnerships with employers	• Ministry of Education • Employer associations • Trade unions	Increased incentives to learn new skills; larger pool of prospective matches; stronger TCNs' motivation to stay engaged

	Proposed guideline	Who should act?	Expected result
13	Support SMEs with on-the-job training and work/study programmes for TCNs	• EC • National authorities • Employer associations	Encourage SMEs to tap into TCN potential with dedicated financial and training support
14	Support employers with funding for language and integration training, e.g. through the ESF+	• EC	Hiring TCNs becomes a more feasible and sustainable option for employers
15	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
Skills-matching			
16	Group TCNs by professional experience (e.g., former entrepreneurs, employees, teachers, etc.) to establish a mutual support system among TCNs with a similar profile and a 'buddy system' with professional associations	• Welcoming Services in coordination with PES offices	Have a more comprehensive picture of TCN talents for potential matching; create a mutual support system among TCNs with a common professional background. Linkages with mentoring programmes could also be explored
17	Invite all relevant stakeholders to centralised job fairs	• PES offices in major cities	Provide a safe environment where TCNs and employers can meet; identify authorised job intermediaries; increase TCNs' visibility. Germany's experience is a successful precedent for consideration and adaptation, although other national contexts may differ
TCNs' job placement			
18	Check in with TCNs and employers during the first year in the job	• Integration offices • Trade unions	Support with problem-solving before it is too late; more effective monitoring systems
19	Monitor effective skills-matching on the job	• Labour Inspectorates • Police force • Trade unions	Support TCN job retention and employer compliance in coordination with law enforcement

7.

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

Feedback from EGSM members on the recommendations presented in this document was collected along with the comments they provided on deliverable D2.1 on TCN qualification recognition, and largely overlaps with it. Colleagues from focus countries – mainly from Bulgaria, Poland and Slovenia – underscored a deep appreciation for the fact that their perspectives had been taken seriously and visibly reflected in the document. In some cases, country colleagues were surprised to find that their input had been clearly incorporated, especially in the proposed guidelines summarised in Table 3. In line with LABOUR-INT III's objectives, this reaction fostered a strong sense of ownership of the co-drafting process, signaling a perceived shift from formal consultation to genuine multi-stakeholder dialogue. According to country colleagues, seeing their suggestions translated into the report also bolstered its credibility, as the recommendations were firmly grounded in the realities described by those closest to the ground, including TCNs themselves.

In addition, country colleagues highlighted the added value of the report, and LABOUR INT III outputs more broadly, in spotlighting a structural issue often underplayed elsewhere: capacity constraints in national public administrations. Far from a marginal inconvenience, these bottlenecks – limited staff time, procedural overload, and slow workflows – directly impede efficient skills-matching for TCNs entering the labour market. For example, in Slovenia, public officials shared they struggle to keep up to date with frequent changes in EU and national legislation governing TCNs' access to the EU labour market. On the other hand, Slovenia welcomed the external perspective offered by LABOUR-INT III's multi-stakeholder dialogue for uncovering blind spots in daily administration and hoped the recommendations would influence broader policy beyond the project.

Despite ample feedback iterations, country colleagues sought even more time to monitor the impact of the proposed guidelines on TCN skills matching and to cross-learn approaches to shared challenges across national boundaries. These points reinforce that capacity constraints play an outsized role in TCN labour market integration, far beyond what is already acknowledged, and highlight the ongoing tension between policy ambitions and real-world implementation. Country views often proved bolder than the perspectives shared by EU and global colleagues, a contrast rooted in the daily operational pressures in focus countries, which leave little time for policy discussions. This required a delicate balancing act in drafting.

At the global level, stakeholders appreciated the effort to condense complex policy debates into concise, user-friendly texts centered on country-level and TCN experiences, which brought fresh, practical insights beyond policy considerations. At the same time, there were calls for deeper analytical treatment and stronger evidence to support the recommendations. This is understandable, given their dependency on specific national contexts. The methodological challenge was to balance explicit references to the evidence base against confidentiality protections of the sources interviewed for this document.

All EGSM members showed strong commitment to making this report more helpful and enduring than past reports, noting that many of the recommendations in this document echo those from previous LABOUR-INT editions. For example, a key outcome of the first LABOUR-INT edition was the compilation of a matrix on best practices on TCN labour market integration, which is annexed to the present document for the record (see Annex 9.2). Some of those practices come from Italy, the only focus country to feature in all three LABOUR-INT editions, although the matrix covers a different region than Apulia, which is the focus of LABOUR-INT III. A structured exchange of lessons learned in Italy after each LABOUR-INT iteration would have yielded interesting comparisons to partners in Italy and beyond; yet, to date there has been no such attempt at cross-fertilisation. EGSM members were keen to explore why many recurring recommendations remain unimplemented and expressed the wish that a dedicated evaluation might focus on this finding in the future.

8.

▶ CONCLUSIONS AND MAIN RECOMMENDATIONS

8.1

SUMMARY OF FINDINGS

The main opportunities and barriers for TCN skills-matching at country level cluster around four recurring issues: information and candidate identification, legal and administrative procedures, host-country language and culture, and other factors such as age, gender, disability, and structural discrimination. Across the focus countries, the report shows that the biggest problems are not only the availability of jobs, but also whether TCNs receive the right information early enough, whether institutions can track them effectively, and whether public systems are able to move them quickly into formal work.

A major theme is that information is often fragmented, late, or difficult to use in practice. TCNs frequently arrive in the EU without knowing where to go for reliable guidance, while public officials and employers struggle to keep up with fast-changing rules and fragmented labour-market data. Delays in first contact with welcoming services or PES offices are especially

damaging, because they push people toward informal or low-quality jobs before accessing formal employment. Once TCNs move into informal work or disappear from administrative systems, it becomes much harder for public authorities and employers to identify, support, and offer them jobs that effectively match their skills.

Legal and administrative processes are another major obstacle, with slow procedures, complex paperwork, and inconsistent implementation across focus countries. In Italy, for example, prolonged procedures can quickly push TCNs into irregular status, while in Bulgaria and Slovenia employers report delays that discourage recruitment. At the same time, language barriers, cultural differences, and personal circumstances further complicate job matching, as successful integration depends not only on qualifications but also on communication skills, workplace adaptation, and reducing bias.

8.2

SUMMARY OF KEY RECOMMENDATIONS

In conclusion, effective skills-matching for TCNs demands a coordinated and flexible approach that addresses sectoral needs, legal barriers, and operational hurdles. The legislative frameworks in Bulgaria, Italy, Poland, and Slovenia illustrate the ongoing challenge of aligning national policies with EU directives and local labour market needs. They also show the critical role of TCNs' legal status. In the case of Ukrainian nationals, whose temporary protection status allows them to seek employment in EU upon arrival, a conducive legislative framework demonstrates that TCN labour market integration can be highly effective when supported by the right legal instruments. There is a strong case to be made for a more holistic approach that considers the hidden skills-matching potential among older TCNs, as well as women, people with disabilities and other TCN population groups, while also addressing structural barriers and strengthening employer support.

Building on the lessons of previous LABOUR-INT editions, the EU and LABOUR-INT III focus countries should prioritise creating a more enabling legal and procedural environment to promote the labour market integration of TCNs. In practice, public administration officials need more human, financial and material resources to implement complex, fast-evolving legislation governing national skills-matching processes. Employers need legal certainty to decide whether to invest in TCNs' skills. Concerned stakeholders, particularly TCNs, need clearer information and guidance, including on innovative partnerships between learning institutions and employers that can help them access formal employment more easily.

Table 3 of this document lists more detailed recommendations to improve skills-matching practices. Some of these recommendations are not new. They reiterate suggestions made since the first edition of LABOUR-INT. Comparing past and present LABOUR-INT recommendations would likely show a clear pattern of opportunities and challenges that can benefit both TCNs and employers alike.

9.

▶ ANNEXES

ANNEX 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)

ANNEX 9.2

► MATRIX OF BEST PRACTICES ON SKILLS AND MIGRATION DEVELOPED BY LABOUR-INT I

Available at: <https://www.labour-int.eu/wp-content/uploads/2026/06/D2.2.-Annex-9.2-Matrix-on-labour-market-integration-practices-LABOUR-INT-I.pdf>

ANNEX 9.3

► MAIN REFERENCES

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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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