

► **LABOUR-INT III:**

ROADMAP TO ENSURE DECENT
EMPLOYMENT CONDITIONS FOR THIRD
COUNTRY NATIONALS IN BULGARIA,
ITALY, POLAND AND SLOVENIA

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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
CAP	Centro di Apprendimento Permanente
DG	Directorate-General
EC	European Commission
EGDEC	Expert Group on Decent Employment Conditions
EGM	Expert Group on Migration
ELA	European Labour Authority
EU	European Union
HR	Human Resources
ILO	International Labour Organisation
IOM	International Organization for Migration
PA	Public Administration
PES	Public Employment Services
SME	Small and Medium Enterprise
TCN	Third-Country National
WS	Welcoming Services

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1.

EXECUTIVE SUMMARY

This report assesses current employment conditions for Third-Country Nationals (TCNs) legally residing in four countries of the European Union (EU): Bulgaria, Italy, Poland and Slovenia. It identifies barriers to TCNs' decent work and suggests a roadmap to overcome them through cooperation between employers, trade unions and other key stakeholders. In line with the expectations set out in the LABOUR-INT III grant agreement, the *Guidelines for Public Employment Services on developing programmes for the integration of Third Country Nationals in Bulgaria, Italy, Poland and Slovenia* provide additional recommendations on broader TCN integration and should be considered an accompanying document to this report.

The analysis draws on a bottom-up, multi-stakeholder methodology incorporating perspectives from TCNs, social and economic partners, and policymakers at both EU and national levels. Data collection included a desk review of key documents, in-depth discussions with the LABOUR-INT III Expert Group on Decent Employment Conditions (EGDEC) and semi-structured interviews with 45 relevant stakeholders, including 16 TCNs. Research constraints were mainly due to limited time and data availability. For this reason, research findings do not represent a comprehensive assessment of the working conditions of TCNs in LABOUR-INT III focus countries.

The EU's commitment to fair and equal treatment of legally residing TCNs has led to the establishment of a robust EU labour migration acquis, which governs how TCNs can come to the EU to work and what rights they enjoy once they reside there. However, this set of rules follows a fragmented regulatory approach that attributes rights and obligations to TCNs based on mainly socio-economic categories, such as those defined in the recast Single Permit Directive (2024/1233), the Blue Card Directive (2021/1883/EU), the Student & Researchers Directive (2016/801/EU), the Intra-Corporate Transfer Directive (2014/66/EU), and the Seasonal Workers Directive (2014/36/EU). Beyond binding legislation, the 2017 European Pillar of Social Rights (EPSR) and its 2021 Action Plan and renewed commitment in July 2026, support equal access to labour markets, although they do not explicitly refer to TCN workers.

National laws on decent employment in focus countries largely align with the EU normative framework. However, practical challenges to their full implementation remain. They include TCNs' limited access to labour rights information and trade unions, unfair wages and working conditions, and the opaque role played by several private employment intermediaries. They compound broader challenges to decent work, such as language barriers or discrimination against specific TCN groups like women and TCNs with disabilities.

The roadmap proposed in this report suggests closer cooperation among public employment services (PES), employers and trade unions on four major areas of intervention: **providing TCNs with access to labour rights information; facilitating their entry into the formal labour market through qualification recognition, skills validation and expanded vocational training options; addressing recruitment practices by some private actors; and enhancing anti-discrimination measures that fully leverage complementary EU monitoring mechanisms.** These recommendations should be considered both in sequence and in parallel, as the roadmap to decent employment for TCNs is hardly ever a linear process.

Feedback from the project's national focal points and other key stakeholders confirmed that decent employment conditions for TCNs remain a timely and relevant concern despite ongoing legislative progress. While they deeply appreciated LABOUR-INT III's stronger multi-stakeholder approach to this edition, stakeholders highlighted the need for even closer cooperation around common challenges, such as accessing accurate information to decent employment requirements. Documenting innovative and best practices was also seen as the project's constructive contribution to ensuring TCNs live and work in decent conditions in the EU.

Table 3 summarises additional recommendations and guidelines for improving TCNs' working conditions. They are numbered and referred to in brackets throughout the document (e.g. #1 for guideline number 1). They also capture additional feedback from LABOUR-INT III stakeholders shared during the drafting process.

2.

▶ INTRODUCTION

The objective of this report is to present a roadmap that ensures decent employment conditions for TCNs legally residing in four EU Member States: Bulgaria, Italy, Poland and Slovenia. In line with internationally agreed definitions, decent employment is productive work for women and men in conditions of freedom, equity, security and human dignity¹.

A bottom-up, multi-stakeholder 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 Decent Employment Conditions (EGDEC), and semi-structured interviews with 45 stakeholders. Of these, 16 were TCNs (nine refugees/Temporary Protection status holders, seven migrants with legal residence status), including twelve women and four men from Bulgaria, Poland and Slovenia. Due to language barriers, secondary sources were used to gather the views of TCNs living in Italy. 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 8.1. 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.

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. In the case of Italy, which follows a highly decentralised approach, recommendations mainly focus on findings from the Apulia region. 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.

¹ International Labour Organisation (2023) *Productivity Ecosystems for Decent Work. Glossary of frequently used terminology*, Geneva: ILO.

3.

▶ **BACKGROUND AND CONTEXT**

3.1

OVERVIEW OF RELEVANT INTERNATIONAL AND EU NORMATIVE FRAMEWORKS

The foundation of decent employment conditions for refugees and migrants is grounded in international human rights and labour standards. Among binding instruments, it is important to recall the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (1990); ILO Convention 189 on Decent Work for Domestic Workers (2011); and the Protocol to ILO Convention 29 addressing new forms of forced labour, trafficking and modern slavery (2014). Among non-binding instruments, the Global Compact for Safe, Orderly and Regular Migration (2018) includes provisions on labour mobility schemes to decent work, labour-market needs and protection of migrants' rights under Objectives 5, 6 and 8. Other relevant objectives include access to regular pathways (9), integration and inclusion (12) and skills validation (19).

At regional level, the EU labour migration acquis regulates the conditions of entry and residence for the purpose of pursuing employment, and the definition of TCNs' rights, including the right to equal treatment (Article 79 of the 2007 Treaty on the Functioning of the EU, or TFEU)². While encompassing all these regulations would be beyond the scope of this document, the following list summarises the most relevant binding instruments from EU labour migration and asylum legislative frameworks, including the labour migration acquis:

- a) the recast Reception Conditions Directive (2024/1346/EU) reduces the waiting period for asylum seekers to access the EU labour market from nine to six months after submitting their application. Member States are required to ensure fair working conditions and respect for labour laws for such groups;
- b) the recast Single Permit Directive EU (2024/1233), which aims to better protect non-EU workers against labour exploitation, amongst other things;
- c) the Blue Card Directive (2021/1883/EU), which provides equal treatment on employment conditions for highly qualified TCN workers;
- d) the Student & Researchers Directive (2016/801/EU), which supports TCNs' work and mobility during their studies in the Union;
- e) the Intra-Corporate Transfer Directive (2014/66/EU), which is designed to ensure the lawful placement of TCN employees from a non-EU company to an EU branch;
- f) and the Seasonal Workers Directive (2014/36/EU), which aims to ensure fair and transparent admission rules and decent working and living conditions for seasonal TCN employment.

Regarding the role of employers in providing decent working conditions, the main binding EU instruments include:

- a) the Employment Equality Directive (2000/78/EC), which prohibits discrimination against all workers, including TCNs, based on religion, belief, disability, age, or sexual orientation;
- b) the Employer Sanctions Directive (2009/52/EC), which is meant to fight irregular migration, for example, by emphasising the payment of proper wages, protection from exploitation and workers' access to complaint mechanisms;
- c) and the Directive on Transparent and Predictable Working Conditions (2019/1152), which provides minimum standards on working conditions for all workers in the EU, including migrants and refugees.

² For more information, see Trivellato, M. P. and Weatherburn, A. (2025) *Realising Fair and Just Working Conditions for Migrant Workers in Europe*. Closing the Rights Protection and Justice Gaps: The Role of the Revised Action Plan on the European Pillar on Social Rights, Brussels: SOLIDAR.

Relevant non-binding EU legislation includes:

- a) the European Pillar of Social Rights (EPSR) and its Action Plan. The EPSR, established in 2017, consists of 20 principles including fair working conditions, social protection, and inclusion. Even though the Pillar does not explicitly mention migrant workers, it supports equal access to labour markets and emphasises non-discrimination regardless of status. Its 2021-2025 Action Plan has created a framework to enforce those rights, focusing on fair wages, secure contracts, and collective bargaining rights for all workers, including migrants and refugees. The EPSR encourages Member States to guarantee equal access to education, training, and social protection to enable integration into the labour market;
- b) the EU Action Plan on Integration and Inclusion (2021-2027). This plan promotes the integration of refugees and migrants by improving their access to labour markets, education, healthcare, and housing. It emphasises early labour market inclusion as a key pillar of integration, advocating for measures to overcome barriers such as language difficulties, skills recognition, and potential exploitation risks. The revised Action Plan, expected in July 2026, will aim to strengthen the enforcement of EPSR principles and ensure that they translate into effective access to decent work for all workers, regardless of nationality or migration background;
- c) the European Commission Quality Jobs roadmap (2025). In it, the EC emphasises fair wages, secure contracts, collective bargaining and protection of workers' rights, including TCN workers. The roadmap represents a first step towards a Quality Jobs Act, which is expected in 2026, alongside a Fair Labour Mobility Package. This package will include relevant legislative and non-legislative initiatives, such as providing legal clarity on the posting of TCNs;
- d) and the 2026 European Asylum and Migration Management Strategy, which aims to simplify legal pathways for TCNs' access to the EU while tackling illegal employment, abuse and exploitation.

Despite this robust set of legislative instruments, the EU's regulatory approach to TCNs' working conditions remains fragmented. In particular, classifying TCNs by their professional status has progressively translated into different rights for different categories of migrant workers, which may be inconsistent with the principle of equal treatment of TCN workers in the EU.

3.2

RELEVANT NATIONAL LEGISLATION IN FOCUS COUNTRIES

While EU legislation sets minimum standards for decent employment, its enforcement depends on implementation at the national level. Coordination between local, regional and national authorities is vital to ensuring consistency in how legislation is adopted.

Bulgaria implements EU directives primarily through its 2001 Employment Promotion Act, which ensures equal treatment of legally working TCNs in Bulgaria. Work permits are required for TCNs, with legal refugees granted access to the labour market under the 1999 Refugees Act, replaced by the 2002 Act on Asylum and Refugees. However, labour market integration faces challenges, like limited recognition of foreign qualifications and language barriers. Bulgaria also applies the 1998 Social Assistance Act to support social inclusion. Recent regulatory updates reinforce oversight mechanisms and strengthen compliance obligations for employers. Under the Bulgarian Labour Code, employers face steep penalties for “undeclared labor”, which means hiring without a valid contract or permit.

Italy has a comprehensive legal framework for the employment of refugees and migrants. The Italian Immigration Act (Consolidated Act on Immigration, Legislative Decree No. 286/1998) provides access to work and social rights for refugees and holders of international protection, as well as migrants with a valid residence permit and asylum-seekers who have resided in the country for at least two months. Italian law 199/2016 criminalises illegal labour intermediation and exploitation. All legal work contracts grant TCNs the same access to work and social rights as Italian nationals. Italy emphasises protection against exploitation, particularly in domestic work, construction and agriculture, where many migrants are employed. Permanent residents have wider employment rights than seasonal workers. In addition, Italian regions are responsible for legislating and implementing active labour market and professional training policies. In Apulia, regional law n. 29/2018 against labour exploitation and the gangmaster system (caporalato) promotes active labour market policies and a three-year anti-exploitation Plan.

Poland has recently improved its regulations on migrants’ employment through the Act on the Labour Market and Employment Services and the Act on the Conditions for the Admissibility of Employing Foreigners in the Territory of the Republic of Poland, both adopted in June 2025. Labour protections under Polish labour law apply equally to migrants and refugees, although refugees have the right to work with fewer bureaucratic hurdles compared to other TCNs. The new legislation has also increased fines for hiring TCNs illegally. In parallel, Poland has introduced higher worker protection measures, greater flexibility for TCNs and their families and support for learning the Polish language.

Slovenia regulates TCNs’ employment conditions through updated and amended legislation, in particular the Foreigners Act (2011), the Employment, Self-Employment and Work of Foreigners Act (2015), and the Labour Market Regulation Act (2010), which were further amended in 2025. Based on these legislative changes, Slovenia is strengthening the protection of foreign workers, including the introduction of new provisions for highly skilled and seasonal workers, as well as the establishment of a register of employers sanctioned for violations of labour legislation, thereby ensuring greater transparency and accountability. In Slovenia, refugees and beneficiaries of subsidiary protection have the right to work without restrictions. National labour law guarantees workers’ rights and social protections equally for TCNs and nationals.

4.

► CHALLENGES AND PRACTICES IN ENSURING TCNs' ACCESS TO DECENT EMPLOYMENT IN FOCUS COUNTRIES

Ensuring decent employment for TCNs remains a pressing challenge in all focus countries. Despite the minimum standards for non-discriminatory labour market access set at global and EU levels, national implementation varies, depending on legal, administrative, cultural, and sector-specific factors. Table 1 summarises current responsibilities for ensuring decent employment conditions for TCNs in Bulgaria, Italy, Poland and Slovenia, alongside practices followed by relevant lead agencies. It also lists other national authorities involved.

TABLE 1.
NATIONAL AUTHORITIES RESPONSIBLE FOR ENSURING DECENT
EMPLOYMENT CONDITIONS FOR TCNS IN BULGARIA, ITALY, POLAND
AND SLOVENIA

Focus Country	National authorities responsible for TCNs' decent work conditions	Main responsibilities
Bulgaria	Ministry of Labour and Social Policy	Sets national labour standards, oversees employment law, and develops labour migration policy
	Commission for the Protection against Discrimination	Examines cases of discrimination based on nationality, origin, citizenship, unequal pay or working conditions
	Employment Agency	Issues work permits, manages labour market access for TCNs, and monitors employment relations
	General Labour Inspectorate Executive Agency	Enforces labour rights and working conditions, including for TCNs, and handles complaints and inspections
Italy	Ministry of Labour and Social Policies	Responsible for setting and monitoring national standards for employment and social inclusion of TCNs
	Prefecture (Sportello Unico per l'Immigrazione / Unified Immigration Desk)	Manages the administrative process concerning TCN work flows and seasonal work flows at the provincial level. Issues first employment authorisations and family-reunification authorisations. Converts residence permits that do not allow the holder to carry out work activity into work permits. Initiates requests for the issuance of residence permits, which are then issued by the competent police headquarters (questura) at provincial level.
	National Labour Inspectorate	Monitors compliance with labour legislation and working conditions, investigates violations, and safeguards TCNs' rights
	INPS (National Social Security Institute) and INAIL (National Institute for Insurance against Accidents at Work)	Ensure that TCNs have equal access to social security and workplace safety protections
Poland	Ministry of Family, Labour and Social Policy	Sets labour market and migration policy and oversees employment rights for TCNs
	Voivodeship Labour Offices	Issue work permits and monitor employment relations at the regional level
	National Labour Inspectorate	Inspects compliance with labour laws and working conditions for all employees, including TCNs

Slovenia	Ministry of Labour, Family, Social Affairs and Equal Opportunities	Develops labour migration policy, manages national labour and employment standards.
	Employment Service of Slovenia	Issues work permits and gives consents to single residence and work permit for TCNs and offers employment support services. Through the service of InfoPoint for Foreigners, which serves as a central contact point where TCN can access, provides guidance on employment, administrative procedures, and their rights.
	Labour Inspectorate	Supervises the employment and work of foreign nationals, ensures compliance with employment laws, and investigates complaints and abuses
	Ministry of the Interior	Participates in the development of integration and migration policies. Responsible for residence permits for TCNs.
	Police	Cooperates with the Labour Inspectorate in detecting illegal employment and the exploitation of workers.
	Human Rights Ombudsman	Deals with complaints and cases of human rights violations of foreign workers.

These national authorities act as the primary institutions responsible for regulating, monitoring, and enforcing decent employment conditions for TCNs in their respective countries, often working in partnership with regional authorities and labour inspectorates. In particular:

- ▶ **Bulgaria** ensures decent working conditions for third-country nationals primarily through strict enforcement of existing labour legislation. The General Labour Inspectorate conducts administrative controls, including mandatory employer notifications and targeted inspections, particularly in high-risk sectors. Employers are required to provide written contracts guaranteeing equal pay and working conditions, and violations are subject to fines and sanctions. Recent regulatory updates have set fines for repeated violations between €10,226 and €15,339 per worker, with additional personal fines of up to €10,226 for responsible officials. Employers are legally obligated to notify the Migration Directorate of any change or termination in a TCN's employment within three days. Failure to comply with these notification procedures triggers automatic administrative sanctions, ranging from €767 to €7670 per instance.
- ▶ The Apulia region in **Italy** has adopted an approach that combines law enforcement with integration services and social support for TCNs. The Region funds the delivery of various services, such as drinking water and waste collection in informal settlements. It has also provided accommodation facilities to house part of the seasonal workforce. In addition, there are activities carried out by trade union migrant offices and by street unions, which intensify during the seasonal harvesting campaigns. Other projects are funded by local resources and managed by social organisations and cooperatives.
- ▶ in **Poland** enforcement of decent work laws is combined with active labour market programmes linked to regional PES. In **Slovenia**, multistakeholder engagement complements EU-funded capacity building projects. In addition, the Employment Service of Slovenia (ESS) has signed a cooperation agreement with the International Organization for Migration to promote ethical recruitment and safe, orderly migration. In cooperation with the Ministry of a Solidarity-Based Future, further development of public services in the fields of social welfare and long-term care is underway, supporting the integration of foreign workers into society and the labour market.

Table 2 examines how LABOUR-INT III project partners collaborate with relevant stakeholders to create conditions conducive to decent work for TCNs in focus countries. The table aims to provide a snapshot of project partners'

multi-stakeholder approach to ensuring decent employment conditions at the national level, both within and outside the LABOUR-INT III project.

TABLE 2.
LABOUR-INT III PROJECT PARTNERS' ROLE IN ENSURING DECENT EMPLOYMENT CONDITIONS FOR TCNs IN FOCUS COUNTRIES

Focus country and LABOUR-INT III project partners	Project partners' contribution to TCNs' decent employment conditions within and/or outside the LABOUR-INT III project						
	Information about labour rights	Collaboration with trade unions	Collaboration with PES	Collaboration with private employment agencies	Collaboration with employers	Collaboration with Labour Inspectorates	Other (specify, e.g. collaboration with NGOs or other national stakeholders)
Bulgaria							
CARITAS Sofia	x	x		x	x		
CITUB	x	x			x	x	x
Italy							
SMILE Puglia	x	x	x	x	x		x
CGIL Puglia	x	x			x	x	x
UMANA SpA	x	x	x		x		x
Poland							
OPZZ	x	x			x	x	x
Slovenia							
ZRSZ	x	x	x		x	x	Human Rights Ombudsman, NGOs, police; the Independent State Authority - Advocate of the Equality Principle
ZSSS	x	x	x		x	x	NGOs, Human Rights Ombudsman, police; the Independent State Authority - Advocate of the Equality Principle

In assessing TCNs' working conditions across focus countries, structural challenges emerge, which are described in detail in the LABOUR-INT III document *Guidelines for public employment services on developing programmes for the integration of migrants in Bulgaria, Italy, Poland and Slovenia*. Legal status is one of the key factors influencing TCNs' access to the labour market and the conditions under which they work in the EU. In addition, for TCNs who already reside in

focus countries and hold a regular work permit, specific further issues arise. They can be grouped around access to labour rights information, the balance between access to the labour market and decent employment conditions for TCNs, challenges for authorities in enforcing national legislation, sector-specific issues and innovative practices from focus countries. The following sub-sections address each of these issues.

4.1

ACCESS TO INFORMATION ON LABOUR RIGHTS AND LEGAL REDRESS

4.1.1

Access to information by TCN workers

Fast-evolving EU and national legislation, language barriers, isolation and mistrust increase the risk that TCNs might receive inaccurate or incomplete information about their rights as workers. Many TCNs prefer to ask people they trust, often from their inner circle of relatives and friends, rather than public authorities or even trade unions. This is often because TCNs fear either losing their work permit if they approach the authorities or losing their job if they already work and ask their employers about their rights. In other cases, TCNs come from countries of origin with weaker labour legislation, which may leave them with little awareness of their current rights. As a consequence, some TCNs may struggle to access legal advice, learn about collective bargaining frameworks or use complaint mechanisms, especially if they are in informal employment. That said, trade unions play a vital role in countering misinformation and disinformation about TCNs' labour rights, providing them with the latest official guidelines (#3, #4).

Stakeholder interviews across all focus countries also highlighted the risk of disinformation spread by some private intermediaries and recruitment agencies. This is particularly the case where recruitment processes may lack transparency or effective oversight. In such cases, the risk of disinformation and misinformation is higher.

4.1.2

Information to support employers' compliance

Access to accurate information about TCNs' labour rights is also often an issue for employers, especially for small and medium enterprises (SMEs). SMEs may not have a dedicated human resources specialist to follow the legislative procedures required to hire TCNs. This is often due to SME's low human resource capacity and time constraints. Providing employers with clear and accessible information on recruitment requirements can help ensure compliance with labour legislation and support decent employment conditions for TCNs. SMEs would greatly benefit from clearer and simpler guidelines on TCN recruitment requirements. Feedback from Poland underlined the state's responsibility to publish clear hiring guidelines to support compliance with legal requirements as a precondition for ensuring fairer work conditions (#10, #11).

Regardless of an enterprise's internal capacity to hire and retain TCNs, the main challenge for employers frequently lies in the complexity of the regulatory framework itself. Employers must navigate a range of migration, labour and social security requirements, which may involve multiple authorities, lengthy procedures and frequently changing rules. These structural barriers can create uncertainty and administrative burdens. Clear, practical and easily accessible guidance, alongside streamlined procedures, would help employers comply with legal requirements and support fair working conditions for TCNs (#10, #11).

4.2

► LABOUR MARKET ACCESS AND DECENT EMPLOYMENT CONDITIONS

Several stakeholders interviewed during the project highlighted that obtaining employment does not necessarily guarantee access to decent employment conditions. Stakeholders also noted that labour shortages in certain sectors create strong demand for workers, making it important to ensure that recruitment is accompanied by effective enforcement of labour standards and adequate safeguards for TCNs. Second, undeclared work and partially declared work increase the risk of poor working conditions and limit access to employment rights and social protection. Indeed, by staying in the informal labour market, TCNs are at a higher risk of working in substandard conditions. Third, some stakeholders noted that TCNs are

often perceived as competing with national workers for the same jobs. These stakeholders reported that perceptions of labour market competition between TCNs and national workers may create additional challenges for labour market integration. Finally, stakeholders stressed that facilitating labour market access for TCNs should go hand in hand with ensuring adequate working conditions, wages, health and safety, and social protection. In this regard, cooperation between employers, trade unions, public authorities and other relevant stakeholders can play an important role in supporting both labour market integration and decent employment conditions for TCNs through a robust vetting process (#9, #10, #11).

4.3

► ENFORCING NATIONAL LEGISLATION IN PRACTICE

On a similar note, having adequate legislation in place is not a guarantee that TCNs will enjoy decent employment conditions. Compared to national workers in focus countries, enforcing laws that protect TCNs in the workplace is a far greater challenge³. In this regard, Bulgaria is a clear example of the discrepancy between law and practice. While the Bulgarian normative and administrative framework allows for the effective processing of most TCN work permit applications, according to stakeholder feedback, over a third of working TCNs leave Bulgaria for another

country within the first six months of their employment. Based on stakeholder interviews, low wages may be the primary reason for TCNs' decision to leave. The feedback also suggests that, in addition to receiving lower-than-EU-average compensation for their work, these TCNs may be discriminated against relative to Bulgarian workers in similar jobs. Due to staff constraints in Bulgarian labour authority agencies, labour inspections are limited in frequency, making it impossible to verify employer compliance with national labour legislation on a regular basis (#13).

³ ELA (2023) *Report on the cooperation practices, possibilities and challenges between Member States – specifically in relation to the posting of third-country nationals*, Final Report, <https://www.ela.europa.eu/sites/default/files/2023-04/ela-report-posting-third-country-nationals.pdf>, p. 43.

4.4

SECTOR-SPECIFIC ISSUES

The above mentioned challenges are compounded by those described in the LABOUR-INT III *Guidelines for public employment services on developing programmes for the integration of migrants*. These issues impact on each stage of TCNs' labour market integration, including securing decent work. They can be grouped around legal and policy challenges, administrative delays, language and cultural barriers, and sector-specific hurdles.

With respect to more sector-specific barriers, it is well documented that TCNs are overrepresented in sectors at higher risk of poor working conditions⁴. In Italy, a significant number of TCNs – particularly from Africa and South Asia – find jobs in agriculture, construction, and home care. Based on feedback from trade unions, these sectors are prone to informality, which increases the chances that TCNs will work in substandard conditions. They may, for example, work without a contract or with a contract that only partially reflects their actual working conditions.

Seasonal agricultural workers reported to NGOs and trade unions that in the Apulia region, they frequently face overcrowded, unsanitary living quarters, wage withholding, and threats of dismissal if they attempt to organise or join trade unions. A recent study by the SMILE Foundation documented how seasonal workers too often live in suburban ghettos in Apulia⁵. In Poland, many TCNs work in manufacturing, logistics, or domestic work, where temporary contracts by private recruitment agencies risk blurring the lines of responsibility between employers and intermediaries. These conditions may lead to exploitation or even forced labour, especially for TCN groups at higher risk of exploitation in the care economy, such as migrant women⁶. According to stakeholder feedback from Slovenia, TCNs are overrepresented in sectors like construction and services, but with limited options for advancement and frequent exposure to non-standard contracts, lower wages, and occupational hazards (#14).

4.5

INNOVATIVE PRACTICES IN FOCUS COUNTRIES

Despite these challenges, innovative responses have begun to emerge. For example, **Bulgaria** has signed bilateral migration agreements with Armenia, India, Moldova, Uzbekistan, etc. to facilitate temporary and seasonal work of nationals from those countries. These agreements aim to stem irregular migration and ensure the protection of TCNs' rights⁷. Bulgaria's General Labour Inspectorate has also created an online series of videos called "Decent Work – Depends on You" on its website⁸.

These educational videos aim to raise awareness of the rights and obligations of workers, including TCNs. More importantly, a practice that seems to work in protecting TCNs from sub-standard working conditions in Bulgaria is to ensure the same person in public administration or partner NGO follows individual TCN cases throughout their labour integration process. This practice often requires supporting TCNs in the longer-term as labour integration – and migrant integration more broadly – can take years⁹.

⁴ See for examples the policy briefs by I-Claim: <https://i-claim.eu/publications/#policy-briefs>.

⁵ Mariano, E. and Villa, A. (eds.) (2025) *Labour Market and Foreign Nationals in Italy and Apulia. The demand for foreign labour by Apulian businesses*, Fondazione SMILE Puglia, p. 56.

⁶ European Commission (2024) 2024 Report on Gender Equality in the EU, Luxembourg: Publications Office of the European Union.

⁷ Eurofound (2025), *Bilateral Agreements for Labour Migration, measure BG-2018-1/3851 (measures in Bulgaria)*, EU PolicyWatch, Dublin, https://static.eurofound.europa.eu/covid19db/cases/BG-2018-1_3851.html.

⁸ <https://www.gli.government.bg/en/node/11819>

⁹ For a more detailed description of broader migrant integration approaches in Bulgaria, please refer to LABOUR-INT III document *Guidelines for Public Employment Services on developing programmes for the integration of Third Country Nationals in Bulgaria, Italy, Poland and Slovenia*.

In **Italy**, projects such as the “Campagne in Lotta” network and legal aid clinics operated by local NGOs in the Apulia region aim to empower migrant workers by offering advice on contracts, help with permit applications, and multilingual resources¹⁰. Some municipalities have established “legal orientation desks” to address the illegal practices of the gangmaster system (Caporalato)¹¹. Six Apulian cities have recently opened “Social Integration Hubs”, which include the 12 offices distributed across the region, with support from the EU Asylum, Migration and Integration Fund (AMIF) to provide legal and social support to migrant workers¹² through both public and private services. In terms of innovative good practices from Apulia, a recent SMILE report highlighted the effective role of local networks in linking public entities, civil society groups, businesses and PES around bottom-up initiatives¹³. An example of this locally rooted collaboration is the ‘Sweet Project’ (Progetto Sweet), which combines anti-exploitation measures for women in agriculture with their economic empowerment (#15).

Thanks to its new legislation, **Poland** now requires equal pay for TCNs and Polish citizens alike. TCNs are also now entitled to free language courses and labour rights education in a language they can understand. **Slovenia** implements pilot programs to test recruitment processes and uphold employment standards. These pilots engage trade unions and employers in shaping best practices¹⁴. A promising practice by ESS in promoting fair recruitment is the organisation of “Living and Working in Slovenia” events. These are online information and job fairs which provide practical information about living and working conditions in Slovenia. They are also meant to connect migrant workers, including TCNs, with prospective employers¹⁵.

Another key initiative is the InfoPoint for Foreigners, which serves as a central contact point where TCNs can access guidance on employment, administrative procedures, and their rights. The EU project “Joint innovative employment support for displaced people from Ukraine” combines active employer engagement, tailored services, and cross-border learning through the cooperation of public employment services, research and professional organisations, and employers’ associations from Slovenia and Lithuania. Within the LABOUR-INT III project, ZRSZ provides guidance and training to help migrants access the labour market, promotes fair and safe employment by engaging employers, trade unions, public services, NGOs and strengthens stakeholder capacity and networking within the Global Classroom network. This network connects institutions such as ESS– ZRSZ, trade unions, employer organisations, non-governmental organisations and public organisations working with migrants. From the perspective of decent work and employment, the Global Classroom network helps guide TCNs through the labour market integration process. It also supports decent working conditions by ensuring TCNs work under fair and adequate conditions, free from exploitation (#15).

¹⁰ <https://campagneinlotta.org/>.

¹¹ See for example the initiative by the city of Bari, Apulia’s capital: https://www.comune.bari.it/web/egov/-/immigrati-sportello-di-orientamento-legale?redirect=https%3A%2F%2Fwww.comune.bari.it%2Fweb%2Fflavoro-e-orientamento%2Freddito-di-dignita-2023-regione-puglia%3Fp_id%3D3%26p_p_lifecycle%3D0%26p_p_state%3Dmaximized%26p_p_mode%3Dview%26_3_groupId%3D0%26_3_keywords%3Dsportello%26_3_struts_action%3D%252Fsearch%252Fsearch&inheritRedirect=true

¹² <https://www.corrieresalentino.it/2025/06/politiche-migratorie-al-via-i-poli-sociali-integrati-con-12-sportelli-in-tutta-la-regione-offriranno-assistenza-sociale-legale-e-lavorativa-alle-persone-migranti/>

¹³ Mariano, E. and Villa, A., *ibid.*, p. 67-68.

¹⁴ European Labour Authority (2025) Posting of Third-Country Nationals: Contracting Chains, Recruitment Patterns, and Enforcement Issues. Insights from case studies, ELA Strategic Analysis, Luxembourg: Publications Office of the European Union.

¹⁵ For more information see: https://employment-social-affairs.ec.europa.eu/news/pespod-25-fair-recruitment-third-country-nationals-2025-11-27_en

5.

▶ **A PROPOSED ROADMAP TO ENSURE DECENT EMPLOYMENT CONDITIONS FOR TCNs**

All LABOUR-INT III national focal points are acutely aware of the current challenges faced by TCNs in accessing decent work in their focus countries. To overcome those challenges, they suggest both following the guiding principles of human rights and fair labour migration and taking a practical approach to improve TCNs' working conditions through multi-stakeholder cooperation.

Table 3 recalls these guiding principles, which apply to all stakeholders and are fundamental prerequisites for enabling TCNs to work under fair and dignified conditions. The table then outlines a series of recommended actions to promote decent work in four major areas of intervention: i) providing access to accurate information to TCNs ii) facilitating their entry into the formal labour market through qualification recognition and expanded vocational training options iii) addressing TCN recruitment practices by private actors and informal intermediaries and iv) enhancing anti-discrimination measures that fully leverage complementary EU monitoring mechanisms. These recommendations should be considered both in sequence and in parallel, as the roadmap to decent employment for TCNs is hardly ever a linear process.

A critical recommendation is to facilitate the formal validation of TCNs' qualifications and skills as a precondition to promote their access to decent work. While waving certification requirements can be helpful in accelerating TCNs' access to jobs, it should complement, rather than replace, the formal validation of their skills. If TCNs have no formal qualifications or skills, then expanding and formalising vocational training options can help them transition to better working conditions and reduce the risk that they might accept informal jobs without a professional certificate (#5, #6, #7, #8). The University Centre for life-long learning (Centro di Apprendimento Permanente or CAP) at the University of Bari, Italy, exemplifies this approach. CAP offers specialised services to help TCNs overcome barriers to entry into the formal labour market through the certification of both hard and soft skills, tailored counselling and the promotion of life-long learning¹⁶.

TABLE 3.
SUMMARY OF RECOMMENDATIONS TO STAKEHOLDERS TO ENSURE DECENT EMPLOYMENT CONDITIONS FOR TCNS IN BULGARIA, ITALY, POLAND AND SLOVENIA

	Proposed guideline	Who should act?	Expected result
Guiding principles			
1	Ensure that all measures supporting TCNs' labour market integration respect fundamental human rights and the principle of equal treatment.	All stakeholders involved in the integration and employment of TCNs	Labour market integration measures are implemented in a way that protects the dignity, rights and equal treatment of TCN workers.
2	Promote fair and regular labour mobility pathways that support both labour market integration and decent employment conditions for TCNs.	National authorities, PES, employers, trade unions and other relevant stakeholders	Labour mobility takes place through transparent and fair recruitment practices, reducing the risks of exploitation and undeclared work.
Information about labour rights			
3	Producing and disseminating labour rights information and clear guidelines in user-friendly and multiple languages while supporting sustainable information and counselling services for TCNs.	Welcoming Services, PES, employer organisations, chambers of commerce, trade unions, NGOs, local and regional authorities	TCNs are aware of their rights as workers early on in their integration process. TCNs better understand their rights in their own language, increasing the chances that they will avoid unsafe or exploitative work conditions. Sustainable funding helps ensure the continuity and accessibility of these services.

¹⁶ 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 provides more detailed information and recommendations on qualification recognition and vocational training.

	Proposed guideline	Who should act?	Expected result
4	Disseminate accurate and up-to-date information on labour rights and employment through the communication channels most commonly used by TCNs (including social media and messaging applications where appropriate).	PES, trade unions, ELA and national labour inspection authorities	Relevant stakeholders reach TCNs through the communication channels TCNs actually use; they contribute to counteracting misinformation and disinformation on job opportunities
Qualification recognition and vocational training			
5	Facilitating the recognition of TCN qualifications and skills through certified fast-track translation services and online submission procedures	Welcoming Services, PES, national qualification recognition authorities	TCNs spend less time waiting for formal recognition of their qualifications and skills; risk of accepting irregular work while waiting decreases
6	Waiving formal education-document requirements for refugee and humanitarian status holders through practical tests	PES, employers, labour inspection authorities	Even refugees and humanitarian TCNs, who may not have the required documents with them, can access work opportunities; employers benefit from more inclusive labour policies
7	Formalising vocational training and validating informal training	National and regional qualification and skills recognition authorities	Validation of TCNs' qualifications and skills leads to easier entry into the formal labour market
8	Expanding vocational training options through apprenticeships and work-study programmes	Employers, trade unions and national qualification recognition authorities	TCNs learn new skills or improve their chances of finding decent work; employers benefit from better qualified workers
Qualification recognition and vocational training¹⁷			
9	Strengthen transparency and oversight of recruitment intermediaries involved in the recruitment of TCNs, through appropriate regulatory and accountability mechanisms.	National authorities, Public Employment Services, labour inspectorates and other relevant stakeholders involved in the recruitment of TCNs.	More transparent and accountable recruitment processes, reduced risks of exploitation and improved protection of TCN workers throughout the recruitment chain.
10	Strengthen cooperation between Public Employment Services, trade unions and employers to facilitate the fair recruitment and labour market integration of TCNs through appropriate support measures where relevant.	Public Employment Services, employers, employer organisations, trade unions and other relevant labour market actors.	Improved matching between employers and TCN jobseekers, supporting fair and sustainable labour market integration and decent employment conditions.

¹⁷ For more detailed information and recommendations on qualification recognition and vocational training, please refer to the 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.

	Proposed guideline	Who should act?	Expected result
Qualification recognition and vocational training			
11	Strengthening complementary EU monitoring mechanisms, e.g. ELA's support for joint inspections of TCNs' working conditions in coordination with national authorities	DG Employment, ELA, and national labour inspection authorities	Increased EU-level monitoring would improve intra-EU coordination on fair mobility and contribute to more consistent enforcement of EU legislation at the country level
12	Reinforcing anti-discrimination measures through safeguards against labour exploitation and adequate staffing of Public Administration offices, especially for TCN groups at higher risk of vulnerability (e.g. women, children, TCNs with disabilities, etc.)	National and regional labour inspection authorities	Increased capacity to monitor and prevent cases of underpayment, wage disparities, unsafe work conditions or unlawful contract breaches
13	Strengthening monitoring and anti-exploitation measures in context-specific sectors at higher risk of exposing TCNs to poor working conditions	National and regional labour inspection authorities	Increased capacity to enforce national and regional decent employment policies
14	Testing innovative approaches piloted in focus countries, e.g. combining measures against women's undeclared work with their economic empowerment	Local authorities, NGOs, trade unions and employers	Improved living and working conditions for TCNs in key sectors, such as agriculture; promotion of alternative pathways to labour market integration, particularly for TCN women.

6.

▶ **FEEDBACK FROM
FOCUS COUNTRIES
AND OTHER KEY
STAKEHOLDERS**

LABOUR-INT III partners and national focal points had the opportunity to reflect on the preliminary findings from this report for approximately six months, from December 2025 to June 2026. They then shared additional comments in writing and at a final meeting of the EGDEC group.

In addition to the reflections summarised in the other LABOUR-INT III documents, feedback from the project's national focal points highlighted how discussing decent employment conditions for TCNs in the EU remains a timely and relevant policy issue. Indeed, despite the fast pace of recent EU and national legislative changes, several challenges to decent employment keep recurring, signalling the need for greater collective efforts. In this regard, there was renewed appreciation for LABOUR-INT's multi-stakeholder approach, which was stronger than in previous editions, with stakeholder engagement involving a representative group of TCNs themselves. Focal points found this enhanced approach particularly refreshing, as it provided new insights and practical recommendations to improve TCNs' working conditions. Focal points from Poland and Slovenia noted that summarising these recommendations in a single document can serve as a useful reference for their daily work.

The need for closer cooperation among stakeholders also underscored the importance of finding common ground to advance decent employment for TCNs (#11). Two issues emerged from feedback sessions that illustrate this point. The former is about the challenges employers face in ensuring decent working conditions. EGDEC members recognised that employers, too, often navigate administrative barriers, lack of information and other hurdles in complying with labour requirements involving TCNs (#3). Section 4.1.2 of this document reflects the shared awareness that challenges lie on the employers' side as well and that solutions require joint efforts. The latter issue illustrating the need to find common ground concerns the ongoing discussion on whether the mandate of the European Labour Authority (ELA) should be expanded. EU-level feedback showed diverging opinions on whether ELA should have higher authority over labour inspections in country. LABOUR-INT III focal points noted the debate is ongoing at national level as well, with national labour inspectorates raising concerns over ELA's potential overreach (#12). Surfacing these open questions in this paper aims to encourage relevant stakeholders to identify constructive solutions together soon.

On a related note, feedback from national and EU stakeholders alike confirmed a strong willingness to document best practices on the ground. While there is widespread awareness that certain challenges recur, EGDEC members underlined the importance of sharing innovative approaches and positive outcomes to foster mutual learning (#15). This was seen as a core element of the LABOUR-INT project and its concrete added value to labour market integration more broadly.

7.

▶ CONCLUSION

The analysis of TCNs' working conditions in Bulgaria, Italy, Poland and Slovenia underlines how, even with an open legislative framework, effective integration depends on implementation. Recent reforms in these countries have improved the legal basis for decent employment with measures such as equal pay, higher transparency and access to more robust complaint mechanisms. Nevertheless, practical barriers still prevent many TCNs from accessing their full rights in the workplace.

Notably, information gaps, enforcement challenges, and sector-specific vulnerabilities remain pressing. TCNs often struggle to access reliable information on their rights due to language differences, distrust of authorities, fear of losing their job if they ask for explanations and the spread of misinformation by some intermediaries. Stakeholders also highlighted that navigating the regulatory framework governing the fair recruitment and employment of TCNs remains complex, requiring clear and accessible information for all actors involved. National enforcement agencies contend with limited resources, especially in sectors characterised by a prevalence of informal work, temporary contracts, and insufficient transparency throughout recruitment processes. Stakeholder consultations also highlighted how TCN workers, including women, in low-skilled jobs in the agriculture, care, and construction sectors are among the most vulnerable to exploitation and abuse.

As summarised in Table 3, key recommendations to improve working conditions for TCNs include disseminating clear and accurate labour rights information, promoting the recognition of formal and informal qualification and skills, expanding vocational training options strengthening transparency, oversight and accountability throughout recruitment processes, reinforcing cooperation between Public Employment Services and employers to support the sustainable labour market integration of TCNs, and improving anti-discrimination safeguards for all TCNs, especially for groups at higher risk of vulnerability, such as women and TCNs with disabilities.

Feedback from national focal points highlighted the key relevance of the multi-stakeholder, bottom-up approach to foster good and innovative practices: digital information campaigns in Bulgaria, legal orientation hubs in Italian municipalities, strengthened inspection and digitalisation in Poland and pilot projects in Slovenia all offer replicable good practices. These include, among others, vocational training, language and digital skills courses, and information sessions on labour rights, residence procedures and access to employment. Effective cooperation between employers, trade unions, public employment services, chambers of commerce and non-governmental organisations has once again emerged as a crucial factor in improving the day-to-day realities faced by TCN workers, confirming the relevance of the LABOUR-INT's multi-stakeholder approach and its ten years of integration partnership.

8.

▶ ANNEXES

8.1

▶ 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

Other stakeholders:

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

8.2

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