

# LABOUR-INT III:

- ▶ GUIDELINES FOR PUBLIC EMPLOYMENT SERVICES ON DEVELOPING PROGRAMMES FOR THE INTEGRATION OF THIRD COUNTRY NATIONALS IN BULGARIA, ITALY, POLAND AND SLOVENIA
- ▶ SEPTEMBER 2026

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

## ► PARTNERS



## ► SUPPORTING ORGANIZATIONS





## LIST OF ACRONYMS

|              |                                              |
|--------------|----------------------------------------------|
| <b>DG</b>    | Directorate-General                          |
| <b>EC</b>    | European Commission                          |
| <b>EGDEC</b> | Expert Group on Decent Employment Conditions |
| <b>EGM</b>   | Expert Group on Migration                    |
| <b>ELA</b>   | European Labour Authority                    |
| <b>EMN</b>   | European Migration Network                   |
| <b>EU</b>    | European Union                               |
| <b>HR</b>    | Human Resources                              |
| <b>NEA</b>   | (Bulgarian) National Employment Agency       |
| <b>PA</b>    | Public Administration                        |
| <b>PES</b>   | Public Employment Services                   |
| <b>SME</b>   | Small and Medium Enterprise                  |
| <b>TCN</b>   | Third-Country National                       |
| <b>WS</b>    | Welcoming Services                           |

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## 1.

# EXECUTIVE SUMMARY

This report analyses current integration programmes for Third-Country Nationals (TCNs) legally residing and working in the European Union (EU), with a particular focus on Bulgaria, Italy (limited to the Apulia region), Poland and Slovenia. Building on recommendations and lessons learned from LABOUR-INT I and II, the document proposes a set of guidelines to improve migrant integration programmes implemented by the Public Employment Services (PES) and other relevant stakeholders in these Member States.

The report adopts a holistic approach to migrant integration by analysing TCNs' overall journey once they have arrived in EU focus countries. It highlights cross-cutting challenges, lessons learned and recommendations emerging from the other LABOUR-INT III documents, namely D2.1 *Report on the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*, D2.2 *Towards a multistakeholder approach to skills-matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market*, D2.3 *Guidelines on how to systematise the delivery of welcoming services for refugees and migrants* and D2.4 *Roadmap to ensure decent employment conditions for migrants*. The document then examines the situation of four TCN groups experiencing particular challenges in integrating in focus countries: women, children, the elderly and people with disabilities. Some of these groups overlap.

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.

Key findings show how, over the last two decades, EU and national legislation on TCN integration has evolved at a rapid pace. Relevant EU Directives and strategic frameworks, such as the European Partnership for Integration (2017, 2022), aim to foster a multi-stakeholder approach to integrating TCNs in all areas of social life. All focus countries have adapted EU legislation on TCN integration to their national context, with Italy having the most articulated legislative framework to date.

Common challenges to TCN integration in focus countries revolve around six issues: project-based approaches to migration, limited labour migration pathways, understaffing in public administration, administrative delays, language training and integration, and entry into the formal labour market. A seventh, cross-cutting set of issues relates to the specific TCN groups mentioned above. Fundamentally, overcoming these challenges will require stronger political will by focus country governments and their parliaments. Their commitment will be essential to move to a longer-term approach to TCN integration.

In light of these findings, key recommendations for more effective TCN integration include **strengthening the capacity of public administration personnel, disseminating targeted information on integration services, reducing administrative delays in processing TCN applications, offering TCNs advanced language training and integration support, enhancing PES officials' coordination with relevant national and EU stakeholders, and tracking TCN integration in their host communities.**

Feedback from LABOUR-INT III project partners in focus countries and other key stakeholders validated these recommendations, particularly the crucial role of language learning and cultural orientation early on in TCNs' integration process. Stakeholders also highlighted the need to showcase best practices in migrant integration that can be replicated and scaled.

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**

This report aims to present a set of guidelines to improve migration integration programmes currently offered to TCNs legally residing and working in four EU Member States: Bulgaria, Italy (relative to the Apulia region), Poland and Slovenia. A bottom-up, multi-stakeholder methodology was employed to gather perspectives from TCNs, social and economic partners, and policymakers at the EU and national 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), including twelve women and four men from three focus countries. In addition, interviews were organised with representatives from public employment agencies, employers, trade unions, chambers of commerce, and NGOs across several EU countries. A list of the organisations interviewed is included in Annex 9.1. Due to their central role in the project, national focal points from each focus country were contacted multiple times to seek additional inputs and clarification.

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 to labour market integration of TCNs, 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. For these reasons, research findings do not represent a comprehensive assessment of the working conditions of TCNs in LABOUR-INT III focus countries.

### 3.

## ▶ BACKGROUND AND CONTEXT

Over the last two decades, EU and national legislation on TCN integration has evolved at a frequent pace. The following sub-sections summarise the main policies and frameworks.

### 3.1

## OVERVIEW OF RELEVANT EU NORMATIVE FRAMEWORKS

EU integration policy for TCNs is guided by a series of binding legislation, strategic frameworks and coordinated actions. The main binding instruments are the following:

- a) the Family Reunification Directive (2003/86/EC), which establishes conditions for family reunification for lawfully residing TCNs. It recognises family unity as central to successful integration and social stability;
- b) and the Long-Term Residence Directive (2003/109/EC), which confers secure status and rights on long-term resident TCNs, ensuring equal access to employment, education, and social protection in their host countries.

The main EU policy frameworks and implementation plans include:

- a) the 2016 Action Plan on the integration of third-country nationals, which provides the framework to support Member States in developing and strengthening integration policies;
- b) and the European Pillar of Social Rights (EPSR) and its 2021 Action Plan. The EPSR, established in 2017, consists of 20 principles promoting equality and inclusion through employment, education, social protection and anti-discrimination. The Pillar explicitly supports non-discrimination based on migrant status. The EC is currently developing a new Action Plan to implement the EPSR, including for migrants and refugees.

Current EU policy is shaped by the EU Action Plan on Integration and Inclusion 2021-2027, the flagship plan promoting integration across access to labour markets, education, healthcare, and housing. The Action Plan emphasises early labour market participation and strives to remove barriers related to language, skills validation, and risk of exploitation. It funds national and local initiatives, mainstreams best practices, and fosters multi-level partnerships, including with employers, trade unions, chambers of commerce, civil society, local authorities, and TCNs themselves. The European Pact on Migration and Asylum (2024) provides a sweeping legislative package to modernise rules, speed up asylum procedures, foster fair responsibility-sharing, and reinforce the integration of migrants and TCNs through improved standards, partnerships, and coordination between Member States. The European Partnership for Integration (2017, 2022) is a framework to mobilise public and private sectors, NGOs, and local communities towards integrating migrants and refugees in all areas of social life.

Relevant to migrant integration are also the 2026 EU anti-poverty strategy and the 2026 Anti-Racism Strategy. These initiatives address key issues, such as homelessness, decent housing for vulnerable groups, including TCNs, and anti-discrimination measures.

## 3.2

# NATIONAL LEGISLATION ON TCN INTEGRATION IN FOCUS COUNTRIES

In the EU, migrant integration is the responsibility of national, regional and local authorities. Focus countries have adapted EU legislation on TCN integration to their national and regional context. Except for Italy, these countries do not have a dedicated national legislative framework but a series of relevant laws and regulations on TCNs which are periodically updated. In particular:

- ▶ **Bulgaria** has no permanent single, unified national integration programme for TCNs, although past initiatives targeted asylum seekers and beneficiaries of international protection. Integration measures rely on legislation including the amended Foreigners in the Republic of Bulgaria Act (2025), Law on Asylum and Refugees (2022), and the Protection against Discrimination Act (2003). The National Council on Migration, Borders, Asylum, and Integration, established in 2019, coordinates related policies across ministries; however, actual integration agreements are rare and often limited to small beneficiary numbers. In line with EU directives, Bulgaria emphasises basic rights, equal opportunities, and non-discrimination for all migrants.
- ▶ **Italy's** national legislation – particularly the Italian Immigration Act (Consolidated Act on Immigration, Legislative Decree No. 286/1998) and the 2018 Security Decrees – forms the backbone of TCN policy by establishing rights, entry protocols, and recognition of various protection statuses. However, 2020 amendments to these laws have limited humanitarian protection for TCNs. The Italian state retains exclusive competence over immigration, but service provision is decentralised to regions. Thus, Apulia actively manages integration through social services, health, and school inclusion, in line with the Reception Conditions Directive (2024/1346/EU). Its Regional Immigration Law (32/2009) is considered a positive model for migrant inclusion, as it protects TCNs regardless of their legal status and fosters multistakeholder coordination; yet its implementation remains slow. Local authorities and municipalities participate in the SAI (ex-SIPROIMI) reception system and implement projects for inclusion,

intercultural dialogue, and language mediation. In practice, the SAI system mainly targets protection holders and the most vulnerable migrants, excluding broader groups of asylum seekers.

- ▶ **Poland** does not have a standalone integration law for TCNs. Integration measures are governed mainly by the amended Act on Foreigners and the Act on Social Assistance, both amended in 2023. Beneficiaries of international or subsidiary protection, such as Ukrainian nationals, receive support via Individual Integration Programmes, although these are short-term (typically one year). Recently, labor market access has been streamlined with new migration and labour rules, such as the New Act (2025). They include a Polish language requirement for long-term residency, integration principles, respect for Polish values and support measures to reintegrate Polish diaspora. The draft of a standalone Integration Strategy has been presented recently, yet it has not been adopted by the government.
- ▶ Similarly, **Slovenia** lacks a specific integration law for all migrants, but various acts and policies regulate rights and support for TCNs, especially those granted international protection. The Foreigners Act (2011) and its amendments (2025) facilitate skilled migration and digital nomad schemes. The International Protection Act, amended in 2021, clarifies integration procedures for beneficiaries of international protection, including language courses, accommodation, and education support. In 2023, the Strategy for the integration of foreigners who are not citizens of the European Union into the cultural, economic, and social life of the Republic of Slovenia was adopted.

4.

## ▶ **THE ROLE OF PUBLIC EMPLOYMENT SERVICES AND OTHER KEY STAKEHOLDERS IN INTEGRATING REFUGEES AND MIGRANTS IN FOCUS COUNTRIES**

This section describes the role of relevant national authorities in Bulgaria, Italy, Poland and Slovenia in promoting TCN integration in focus countries, with a special focus on the responsibilities of PES.

**TABLE 1.**  
**NATIONAL AUTHORITIES RESPONSIBLE FOR THE INTEGRATION OF TCNs IN BULGARIA, ITALY, POLAND AND SLOVENIA**

| Focus Country | National authorities responsible for TCNs' integration, including PES                                                                   | Main responsibilities                                                                                                                                                                                                                                                                                    |
|---------------|-----------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bulgaria      | National Council on Migration, Borders, Asylum and Integration                                                                          | formulates and implements national policies for migration, borders, asylum, and integration; oversees the legal framework and strategic approach for TCNs including residency, asylum, and long-term integration measures                                                                                |
|               | International Projects Directorate of the Ministry of the Interior                                                                      | manages and provides funding through AMIF, the International Security Fund, Norwegian Financial Mechanism, Swiss – Bulgarian Cooperation Program                                                                                                                                                         |
|               | State Agency for Refugees                                                                                                               | responsible for reception, accommodation and the procedure for international protection                                                                                                                                                                                                                  |
|               | PES/National Employment Agency                                                                                                          | issue work permits for TCNs, ensure legal compliance regarding employment conditions, offer job placement services, and coordinate vocational training and upskilling programme                                                                                                                          |
| Italy         | Multiple line ministries including the Ministry of Education, Universities and Research, and the Ministry of Labour and Social Policies | coordinate integration policies covering education, employment, social welfare, and overall inclusion for TCNs. Their tasks include supporting access to education, language learning, labour market integration, and monitoring social integration programmes at both the local and national levels     |
|               | PES                                                                                                                                     | act as the main access point for TCNs to labour market programmes, job vacancies, language courses, and vocational training; support skills assessment, recognition of third-country qualifications, personalised counselling, and networking to improve TCNs' employability and smooth their transition |
| Poland        | Office for Foreigners                                                                                                                   | Management of procedures for asylum, residency, and integration support for TCNs. Duties include the operation of reception centres, legal assistance, social programme implementation, and overseeing the administrative aspects of migrant integration at the national level                           |
|               | PES                                                                                                                                     | help TCNs find jobs, conduct language classes, support recognition of qualifications, and offer vocational guidance and retraining; support TCNs and employers with legal and procedural guidance                                                                                                        |

| Focus Country | National authorities responsible for TCNs' integration, including PES | Main responsibilities                                                                                                                                                                                                                                                                           |
|---------------|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Slovenia      | Ministry of the Interior                                              | responsible for migration policy, residence permits, and integration measures for foreigners                                                                                                                                                                                                    |
|               | Ministry of Labour, Family, Social Affairs and Equal Opportunities    | responsible for work policy, involved in the social and economic integration of TCNs, including employment and social affairs                                                                                                                                                                   |
|               | Government Office for the Support and Integration of Migrants (UOIM)  | designs and delivers integration programmes, facilitates language and social orientation courses, ensures access to housing and employment initiatives, and coordinates with other national and local agencies for effective integration of TCNs                                                |
|               | Employment Service of Slovenia (PES)                                  | provides job-matching, skills development, and language integration programmes for TCNs, focusing on equal access to the labour market; coordinate requalification processes, offer counselling and community networking to foster inclusion and support migrant integration more holistically. |

These national authorities act as the primary institutions responsible for ensuring the integration of TCNs in their respective countries. In particular:

- ▶ **In Bulgaria**, coordination gaps exist between PES, social services, trade unions and NGOs, which often results in fragmented, ad hoc support for TCNs. Some pilot projects combine employment counseling with social support to foster holistic integration (#2). Efforts are underway to improve qualification recognition and labor market information accessibility for migrants.
- ▶ **In Italy**, PES struggles with limited targeted programs for refugees, and many migrants face difficulties liaising with multiple disconnected agencies. In terms of practices, Italy uses individual integration plans combining vocational training, language learning, and job placement, often in cooperation with NGOs and local authorities (#16, #17). Online platforms and mobile assistance help widen PES reach for foreign workers, including migrants, for example through the online portal 'cliclavoro' (#8).
- ▶ **In Poland**, PES often deals with TCNs on short-term permits and a focus on seasonal or manual labor jobs, which restricts migrants' career advancement prospects. Like Italy, Poland offers individual integration programmes providing language courses, social counseling, and employer engagement for refugees. PES cooperation with education and certification bodies enhances the recognition of third-country qualifications. Regional PES offices tailor support mechanisms and collaborate with NGOs to assist job matching and intercultural orientation (#13, #14, #15).
- ▶ **In Slovenia**, PES heavily rely on EU project funding for TCN integration programmes, raising sustainability concerns. Slovenia has piloted specialised PES services for migrants, integrating labour counselling with language training and cultural orientation. PES is also providing on-the-job training for persons with international protection and foreigners, including TCNs. Multi-stakeholder collaboration involving social partners and NGOs was once weak but is gradually strengthening, helping to develop employment and match skills with demand. PES have also increased digitisation and community outreach to improve TCNs' access to the labour market, especially in less urbanised regions (#16, #17).

## 5.

 **CHALLENGES AND PRACTICES IN FACILITATING TCN INTEGRATION**

This section examines the recurring challenges that TCNs encounter throughout their integration process in focus countries, as well as the needs of specific TCN groups. It provides a more comprehensive view of challenges and practices identified in the other LABOUR-INT III documents<sup>1</sup>, with the aim of fostering a holistic approach to TCNs' labour market integration.

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<sup>1</sup> These are: D2.1 *Report of the recognition of regulated and non-regulated qualifications of Third-Country Nationals in the EU*, D2.2 *Towards a multistakeholder approach to skills-matching: an assessment of current skills-matching practices for Third-Country Nationals in the European labour market*, D2.3 *Guidelines on how to systematise the delivery of welcoming services for refugees and migrants* and D2.4 *Roadmap to ensure decent employment conditions for migrants*.

Table 2 summarises how LABOUR-INT III project partners support this integration process. It aims to give a snapshot of the multi-stakeholder approach taken by these partners to ensure TCN integration at the national level, both within and beyond LABOUR-INT III project activities. The table is organised around the following key aspects of integration:

- ▶ reception and early orientation;
- ▶ access to basic services, such as housing, food and clothing, health care, education for TCN children, etc.;
- ▶ language training and cultural orientation;
- ▶ social and economic participation, such as qualification recognition, professional training, skills-matching and job placement;
- ▶ long-term integration and active citizenship;
- ▶ support to specific vulnerable groups, such as women, the elderly and people with disabilities;
- ▶ and any other contribution to migrant integration.

It is important to note that employers and other labour market actors also face their own challenges in supporting TCN integration. These include complex recruitment procedures, lengthy administrative processes, difficulties assessing foreign qualifications and skills, language barriers, and limited access to tailored guidance and support services. These challenges can be particularly burdensome for small and medium enterprises (SMEs), which often lack dedicated human resource or legal specialists. Addressing such barriers can contribute to more effective skills matching, faster labour market integration and better outcomes for both TCNs and employers (#8, #12).

**TABLE 2.**  
**LABOUR-INT III PROJECT PARTNERS' ROLE IN FACILITATING TCNS' INTEGRATION IN FOCUS COUNTRIES WITHIN AND BEYOND THE LABOUR-INT III PROJECT**

| 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 |                          |                                            |                                               |                                                 |                                |                                                                                                    |
|---------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------------------------|-----------------------------------------------|-------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------|
|                                                   | Reception and access to information                                                                                   | Access to basic services | Language training and cultural orientation | Social participation and economic integration | Pathways to long-term integration / citizenship | Support to specific TCN groups | Other contribution (specify)                                                                       |
| <b>Bulgaria</b>                                   |                                                                                                                       |                          |                                            |                                               |                                                 |                                |                                                                                                    |
| CARITAS Sofia                                     | x                                                                                                                     | x                        | x                                          | x                                             |                                                 | x                              |                                                                                                    |
| CITUB                                             |                                                                                                                       |                          |                                            |                                               |                                                 |                                |                                                                                                    |
| <b>Italy</b>                                      |                                                                                                                       |                          |                                            |                                               |                                                 |                                |                                                                                                    |
| Fondazione SMILE Puglia                           | x                                                                                                                     | x                        | x                                          | x                                             | x                                               | x                              | x                                                                                                  |
| CGIL Puglia                                       | x                                                                                                                     | x                        |                                            | x                                             | x                                               | x                              | x                                                                                                  |
| UMANA SpA                                         |                                                                                                                       |                          | x                                          | x                                             |                                                 |                                |                                                                                                    |
| <b>Poland</b>                                     |                                                                                                                       |                          |                                            |                                               |                                                 |                                |                                                                                                    |
| OPZZ                                              |                                                                                                                       |                          | x                                          |                                               |                                                 | x                              |                                                                                                    |
| <b>Slovenia</b>                                   |                                                                                                                       |                          |                                            |                                               |                                                 |                                |                                                                                                    |
| ZSSS                                              | x                                                                                                                     | x                        | x                                          | x                                             |                                                 | x                              | Establishing a multi-stakeholder support network involving institutions, social partners and NGOs. |
| ZRSZ                                              | x                                                                                                                     | x                        | x                                          |                                               | x                                               | x                              |                                                                                                    |

In facilitating the integration of legally residing and working TCNs in focus countries, PES officials must address several structural challenges emerging at each step of TCNs' journey. These challenges revolve around six issues: project-based approaches to migration, limited labour migration pathways, understaffing and its repercussions on law

enforcement, administrative delays, language training and cultural orientation, and entry into the formal labour market. A seventh, cross-cutting set of issues relates to specific TCN groups, such as women and vulnerable TCNs. The following sub-sections address each of these challenges.

## 5.1

### PROJECT-BASED APPROACHES TO MIGRATION

Across focus countries, stakeholder consultations highlighted a mismatch between the structural, long-term challenge of TCN migration and the project-based approaches that are currently adopted. LABOUR-INT III project partners noted that migration is a permanent feature requiring sustainable approaches and policies. Effectively addressing the integration of migrants needs long-term solutions backed by political will. Instead, according to LABOUR-INT III focal points, national policies in focus countries seem to favour short-term interventions in the form of humanitarian projects.

For example, Italy-based project partners believe that their government's response to migration follows an emergency approach, placing an undue burden on national welcoming services and first-aid public assistance. In their experience,

Italian national legislation does not recognise immigration as a structural issue requiring long-term social and labour policy solutions. Rather, Italy's response to migration is framed in terms of humanitarian assistance provision through short-term projects. Stakeholder interviews suggested that opting for this project-based approach might be a way for decision-makers to manage the public perception of TCNs as competing with local workers and respond to the ongoing political debate surrounding immigration in focus countries. As a result, interviewees claimed there are no government incentives to support TCN entrepreneurship or economic empowerment in Italy. To the contrary, in their opinion, short-term approaches to immigration perpetuate a culture of dependence, which may further alienate public opinion (#1, #2).

## 5.2.

### LIMITED REGULAR LABOUR MIGRATION PATHWAYS

Another recurring challenge is the limited number of regular labour migration pathways in focus countries. While many TCNs may have a valid work permit upon their arrival in the EU, their legal status often changes within a few days due to strict legal requirements imposed at national level. Again, in Italy, this is the case of many migrants who need their future employer to validate their work permit at the local police station within eight days of their arrival. If the employer is unable to complete the required procedure within this period, TCNs' work status becomes irregular. This legal loophole is often used by organised crime to attract migrants to Europe with legally void employment contracts. Once TCNs lose their work permit, they are more vulnerable to exploitation and abuse (#3, #10, #12).

Restricted access to certain labour sectors also limits the potential of regular labour migration pathways. In Poland and Slovenia, for example, TCNs face sectoral restrictions due to government controls over which labour sectors TCNs may access. These limitations affect even migrants under temporary protection status, such as Ukrainian nationals. As a result, TCNs' employment opportunities and job security are limited from the start. To a large extent, TCNs' initial legal status determines their future living and working conditions. Without a regular work permit, the likelihood that TCNs will accept irregular work just to be able to survive will increase (#3, #10, #12).

## 5.3

### ► UNDERSTAFFING IN PUBLIC ADMINISTRATIONS

A third recurring challenge to ensuring TCN integrate in focus countries is understaffing in Welcoming Services (WS), Public Employment Services (PES) and Labour Inspection offices<sup>2</sup>. In all focus countries, public systems to orient, train and support TCNs in the labour market are generally under-resourced, which points to a mismatch between the scale of TCN migration to focus countries and the resources allocated to manage it adequately (#4). The impact of understaffing is visible in two fundamental ways.

First, the ability of public administration (PA) officials to enforce EU and national legislation is reduced. Many PA staff interviewed shared that they have no time to follow legislative changes, especially at EU level, and seldom receive additional training or support to manage their TCN workload. PA internal guidelines on TCN case management may be vague, which exposes them to the risk of arbitrary interpretation of the rules (#5).

Second, understaffing within Labour Inspection offices has negative repercussions on law enforcement. Stakeholder consultations consistently highlighted that the challenge is less about improving existing laws on migrant integration than about their practical implementation and monitoring at the country level. For example, Bulgaria has developed a system of 19 different regimes for migrant workers consistent with current EU legislation. However, the reality is that the number of labour inspectors is too low compared to the number of enterprises they are responsible for monitoring. This limited capacity may reduce the likelihood that breaches are identified and addressed in a timely manner. A similar problem can be found in Italy, where 10,000 inspectors are responsible for monitoring over four million enterprises (#20).

## 5.4

### ► ADMINISTRATIVE DELAYS

Administrative delays are an essential barrier to effective TCN integration. They can be particularly severe early in the process, for example when TCNs apply for recognition of their academic qualifications or validation of their professional skills.<sup>3</sup> While migrants under Temporary Protection benefit from fast-track procedures, for other TCNs, assembling official documents for qualification recognition and other administrative procedures can be a lengthy and costly ordeal. Refugees may find these procedures especially challenging as they may have left their country of origin without the necessary documentation. During this waiting period, TCNs become more vulnerable to exploitation and abuse as they need to sustain themselves (and their families, if they live together) any way they can. The longer the wait, the higher the risk they will accept irregular employment (#10, #11, #12).

Excessive bureaucracy and insufficient coordination between relevant authorities can compound the impact of administrative delays. In Italy and Poland in particular, permit renewals, paperwork errors and changes in EU and national legislation often result in protracted integration procedures. In Slovenia, fast-changing legislation also complicates the TCN case workload. Bulgaria, on the other hand, represents an exception to this trend. Administrative procedures are generally light and processing times short. Migrants in non-regulated professions, for example, do not need to produce academic certificates or speak Bulgarian to work. Seasonal workers can start working as early as seven days after their arrival. However, some coordination challenges persist between the National Employment Agency (NEA) and the Ministry of Interior, leading to delays (#10, #11, #12).

<sup>2</sup> Include hyperlink to LABOUR-INT III Guidelines on Welcoming Services once they have been uploaded on the LABOUR-INT's website.

<sup>3</sup> See the LABOUR-INT III *Report on the recognition of regulated and non-regulated qualifications of Third-Country nationals in the EU* for details.

## 5.5

## LANGUAGE TRAINING AND CULTURAL ORIENTATION

Language training is an essential part of TCN integration in focus countries, however it remains largely inadequate to labour market demands. Surveys carried out for a recent academic study have highlighted how limited Italian-language skills restrict TCNs' integration into the labour market and reduce their bargaining power with employers<sup>4</sup>. In light of this, it's worth mentioning that the vocational training courses organised by SMILE Puglia – entirely held in Italian, with the support of a cultural mediator – have enabled participants to improve their proficiency in the language while also acquiring the specific terminology related to the relevant professional sector. In Poland, limited Polish fluency prevents TCNs from securing better jobs and increases the risk of discrimination. While all TCNs interviewed expressed a strong interest in learning the host country language at least at B1 proficiency level, for the most part they can only attend courses up to A2 level, which in their view do not equip them with the language skills they need to get 'a good job' in their host country. A CV written in English implicitly conveys the message that the TCN is not familiar with the local language and may require additional support from future employers. This impression alone may discourage prospective employers from hiring TCNs (#13, #14).

While learning Eastern European languages is relatively easier for Ukrainians, it is particularly hard for Arabic-speaking TCNs due to remarkable differences in alphabetic characters and word roots. In practice, these differences in language learning acquisition mean that Arabic-speaking TCNs may spend considerably longer periods of time without a job than Ukrainians and may need extra support to learn their host country language. In the meantime, though, most TCNs still need to secure an income quickly to survive.

Cultural orientation also plays a crucial role in migrant integration and remains challenging across all focus countries. In Bulgaria, Italy and Poland, it is part of the early orientation package provided by civil society and trade union project partners. In Slovenia, PES (ESS) plays a similar role. 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 in Bulgaria, who may be less familiar with European culture and ways of working (#15).

Recurring feedback from all focus countries suggests that 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 in Bulgaria and Poland suggest that Ukrainian nationals may be perceived to be a safer choice for recruitment than other TCNs because of their European background and often higher educational level (#15).

<sup>4</sup> See Ghio, D. et al. (2023) Linguistic Barriers to Immigrants' Labor Market Integration in Italy, *International Migration Review*, 57(1):357-394, <https://journals.sagepub.com/doi/10.1177/01979183221107923>.

## 5.6

### ▶ ACCESS TO THE FORMAL LABOUR MARKET

Recognition of TCN qualifications and validation of their formal, non-formal and informal skills remain a bottleneck in Italy, Poland and Slovenia. As noted above, refugees and asylum seekers, especially, may find themselves without the documents they need to prove their level of education or skills. This hinders their access to vocational training and job opportunities. Of even greater concern, lack of documentation keeps these TCNs at higher risk of entering the informal labour market and staying there permanently. This is because, on average, systems for validating non-EU qualifications and professional experience are often slow, under-resourced, or opaque. These limitations restrict TCNs' upward labour mobility, relegating them to low-skilled, low-pay positions with no legal protection (#11, #12, #18).

Bulgaria represents a notable exception to this trend. In recent years, national authorities have made remarkable progress to facilitate TCNs' entry into the formal labour market by accelerating the recognition of their qualifications and validation of their skills. However, challenges remain as remuneration for even formal jobs in Bulgaria is well below the EU average, something which leads many TCNs to move to other EU countries with higher salaries.

Staying in informal jobs has adverse repercussions on other dimensions of migrant integration, such as access to housing, social participation and pathways to citizenship. Indeed, informal jobs prevent TCNs from accessing better housing, as rental contracts typically require proof of regular employment. Many TCNs in Apulia, for example, are relegated to ghettos far from urban areas and with no public infrastructure due to this hurdle<sup>5</sup>. Informal employment also means TCNs have no labour rights nor opportunities to actively participate in the social life of their host communities. Fear of detention or deportation due to their irregular status keeps them invisible. It may act as a deterrent to applying for citizenship even years after TCNs have arrived in the EU. In short, TCNs' limited ability to transition from informal to formal labour appears to be a much bigger hurdle for them than finding a job (#23).

## 5.7

### ▶ CHALLENGES AND PRACTICES IN SUPPORTING THE INTEGRATION OF SPECIFIC TCN GROUPS

A cross-cutting theme across all focus countries is the integration of specific TCN population groups that face particular challenges upon arrival in the EU. Due to time constraints, the following sections summarise the challenges faced by a non-exhaustive list of these TCN groups: women, children, the elderly (adults above 65 years) and people with disabilities.

Feedback from the country-based project partners consulted for this study revealed that, on average, TCN data disaggregation is limited to gender. Individual organisations may use additional criteria, for example, to categorise TCN single parents. A nationwide data analysis of these groups in each focus country is beyond the scope of this report, although it is highly recommended. Limited disaggregated data may point to lack of tailored support for the most vulnerable TCN groups (#24, #25).

<sup>5</sup> 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.

### 5.7.1 Women

Based on stakeholder interviews, many female TCNs living in focus countries are unable to work for various reasons. Some of them may have come to Europe to accompany their working spouse but do not have a regular work permit themselves. Other women have family obligations, such as childcare or assistance to elderly relatives, which prevent them from seeking work, especially formal jobs with set working hours outside the home. Some women may not have the basic qualifications to apply for work and prefer to support more educated or skilled family members with their job search. Sometimes, strict cultural traditions from their country of origin forbid female TCNs from seeking work. Rather, they are expected to stay at home looking after their family. However, the experience of the 41 Bangladeshi women in Apulia mentioned above<sup>6</sup> shows that female TCNs can make a positive contribution to the labour force when they are supported with adequate training and qualification recognition. Their lived experience represents a good practice which can be replicated elsewhere.

While many TCN women are qualified and want to find work, their integration in focus countries can be more challenging than for their male counterparts. For example, feedback from interviews with TCNs in Bulgaria suggests that women may be more vulnerable to online scams, particularly those involving fake employment ads on social media platforms, such as Viber and Telegram. This could be because more TCN women than men seem to rely on online groups created by their fellow nationals for advice and support. Additionally, female TCNs are particularly exposed to the risk of informal employment in an effort to balance work with their family obligations. This is the case for women who bear a disproportionate share of household chores and childcare compared to their spouses. For similar reasons, TCN women may prefer remaining in the informal labour market because it offers more flexibility and opportunities for home-based work. For example, a couple of Ukrainian women benefitting from International Protection status interviewed for this report have started an income-generating activity by making handicrafts at home. These factors, however, also expose women to the higher risk of exploitative labour conditions. More broadly speaking, informal jobs may isolate TCN women from their social and cultural environment, making it more difficult for them to integrate in their new communities (#6, #7).

Some focus countries have taken steps to encourage women's employment but still exclude female TCNs. For example, Italy has recently introduced a bonus of up to €650 per month in social security contribution relief for working women. However, this bonus is not accessible to people employed in domestic work and/or those with fixed-term contracts, which represents the type of employment held by most TCN women<sup>7</sup>.

### 5.7.2 Children

Interviews with TCN parents reveal that their children's education and well-being significantly influence their decision to migrate to the EU. Parents hope their children will have better job opportunities and a higher quality of life, primarily through access to education. Nevertheless, several factors make TCN children more vulnerable to discrimination than their national peers in focus countries.

To start, children may feel less motivated to study due to language and cultural barriers. Stakeholder interviews in Slovenia highlighted the importance of training local and school authorities on changes in TCN integration guidelines. Without training, these authorities may not be sufficiently equipped to support the school integration of TCN children, which increases the risk of their marginalisation. In some rare cases, according to partner feedback, TCN children have been denied access to school because they were mistakenly considered ineligible to attend classes.

In addition, some TCN families may have limited opportunities for their children to interact with the host community. In Bulgaria, for example, one interviewee described Ukrainian families as tending to socialise mainly within their own community for mutual support. This may inadvertently lead their children to have fewer chances to speak Bulgarian regularly or become familiar with their new environment. In such circumstances, child TCNs may experience feelings of isolation and, in some cases, psychological stress, which child protection services may not always detect. According to other stakeholders, this may also be the case for children of other TCN groups (#7).

<sup>6</sup> See Section 5.5.

<sup>7</sup> See <https://lavoro.gov.it/pn-giovani-donne-lavoro/progetti/bonus-donne-2026>.

### 5.7.3 The elderly

Elderly TCNs may also encounter significant challenges in trying to integrate into their host communities in focus countries. Some of them may be unable to leave their house due to their health conditions and heavily depend on other TCN family members to survive. Without adequate support, older TCNs may suffer from social isolation and exclusion (#7).

In other cases, elderly TCNs may still want to work but face age discrimination in addition to prejudice due to their migrant status, which prevents them from finding a job. Poland has tried to address these issues by establishing Centres for the Integration of Foreigners, which, among other services, map underserved populations, such as older migrants, and tailor their outreach accordingly. For example, the Centre in Poznań concentrates a range of social services in one place, including health care, psychological support and language courses<sup>8</sup>.

### 5.7.4 People with disabilities

On a similar note, TCNs living with disabilities are at higher risk of social exclusion. If they have mobility issues, their condition may significantly impact their employability, as well as the employability of their relatives, who may be forced to work only limited hours to care for them. Interviews with TCNs in Slovenia and Bulgaria revealed how, in some cases, the lack of adequate health care for migrants with disabilities had led their spouses to quit their jobs entirely after a few months. In other cases, however, TCNs may only have light disabilities, which means they could still be considered for hiring.

A related, important issue is health insurance coverage for these migrants. Feedback from Bulgaria suggests that TCNs face more challenges than the locals in finding insurance companies willing to cover their disability. If national health coverage is insufficient, private insurance is often too expensive for TCNs to afford (#7).

<sup>8</sup> <https://mapujpomoc.pl/en/placowki/centrum-integracji-cudzoziemcow-w-poznaniu-center-for-integration-of-foreigners-in-poznan/>.

6.

## ▶ **PROPOSED GUIDELINES TO IMPROVE TCN INTEGRATION PROGRAMMES**

This section summarises principles and operational guidelines that support migrant integration in focus countries and the EU more broadly. It draws on lessons learned from previous LABOUR-INT editions, as well as recommendations from other LABOUR-INT III documents analysing specific stages in TCNs' integration journey. While the guidelines mainly focus on the operational role of PES, the underlying principles are addressed to political decision-makers, including national government authorities and parliamentarians. This is in recognition of the fact that migrant integration cannot succeed without strong political support by the host country.

TABLE 3.

### SUMMARY OF PROPOSED GUIDELINES TO IMPROVE MIGRANT INTEGRATION PROGRAMMES FOR TCNs IN BULGARIA, ITALY, POLAND AND SLOVENIA

|                                                      | Proposed guideline                                                                                                                   | Who should act?                                                                                         | Expected result                                                                                                                                                               |
|------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Guiding principles</b>                            |                                                                                                                                      |                                                                                                         |                                                                                                                                                                               |
| 1                                                    | Adopting a long-term approach to migrant integration                                                                                 | European Commission, Parliamentarians, relevant Ministries and national, regional and local authorities | More sustainable labour migration and social policies targeting TCNs                                                                                                          |
| 2                                                    | Taking a holistic approach to migrant integration, including by strengthening technical expertise and increasing financial resources | European Commission, Parliamentarians, relevant Ministries, national, regional and local authorities    | TCNs are fully integrated in their host community and are more likely to stay in their new country                                                                            |
| 3                                                    | Increasing regular labour migration pathways                                                                                         | European Commission, Parliamentarians, national, regional and local authorities                         | TCNs have improved access to the formal labour market and enjoy equal treatment; employers rely on more predictable migration flows                                           |
| <b>Strengthening the capacity of PES personnel</b>   |                                                                                                                                      |                                                                                                         |                                                                                                                                                                               |
| 4                                                    | Staffing PES and WS offices in adequate numbers                                                                                      | Ministries of Labour and Social Policy, regional authorities                                            | Higher capacity to deal with TCN case management; lower processing times and administrative delays                                                                            |
| 5                                                    | Updating personnel on EU and national legislation changes                                                                            | Ministries of Labour and Social Policy, regional authorities, legal experts                             | More consistent and less arbitrary decisions by PES staff; TCN and employers benefit from even implementation of relevant laws                                                |
| 6                                                    | Training personnel in addressing women and gender-specific challenges                                                                | Ministries of Labour and Social Policy, regional authorities, experts                                   | Female TCNs have more access to formal employment and benefit from better support; employers benefit from a broader hiring pool in target sectors                             |
| 7                                                    | Training personnel in addressing challenges of other TCN groups (children, elderly TCNs, people with disabilities, etc.)             | Ministries of Labour and Social Policy, regional authorities, experts                                   | TCN groups with specific needs benefit from better support; employers benefit from hiring some of these groups (e.g. people with light disabilities) through flexible schemes |
| <b>Providing information on integration services</b> |                                                                                                                                      |                                                                                                         |                                                                                                                                                                               |
| 8                                                    | Providing user-friendly information to TCNs in key migrant languages, including through social media channels                        | WS, PES, NGOs                                                                                           | TCNs and employers have a clearer understanding of what to expect from public administration throughout the integration process                                               |
| 9                                                    | Facilitating intra-EU dissemination of best practices, lessons learned and collective problem-solving                                | European Migration Network (EMN), national authorities, NGOs                                            | PA officials from different EU countries learn from each other and share innovative practices and solutions to common integration challenges                                  |

|                                                                          | Proposed guideline                                                                                                                                                     | Who should act?                                                                                  | Expected result                                                                                                                                                                                                                                                        |
|--------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Reducing administrative delays</b>                                    |                                                                                                                                                                        |                                                                                                  |                                                                                                                                                                                                                                                                        |
| 10                                                                       | Establishing a well-resourced 'one-stop shop' service for TCNs for general information and orientation purposes, regularly financed by the state or local authorities. | Ministries of the Interior, Labour and Social Policy, regional and local authorities             | Better understanding of hosting country, by TCNs; more sustainable TCN integration, including labour integration; better inclusion of TCNs in community life; higher chances they will stay in their new country and in their jobs; lower risk of exploitation of TCNs |
| 11                                                                       | Establishing a 'one-stop shop' service for TCNs to apply for the validation of their skills and recognition of their qualifications in key migrant languages           | Ministries of Education, PES, local authorities                                                  | TCNs have improved access to the formal labour market and enjoy labour rights; employers rely on more predictable migration flows                                                                                                                                      |
| 12                                                                       | Streamlining and fast-tracking other administrative procedures                                                                                                         | WS, PES, police authorities                                                                      | TCNs have improved access to the formal labour market; employers can count on shorter processing times                                                                                                                                                                 |
| <b>Offering language training and cultural orientation opportunities</b> |                                                                                                                                                                        |                                                                                                  |                                                                                                                                                                                                                                                                        |
| 13                                                                       | Providing language training early in the integration process                                                                                                           | Ministries of Education, Welcoming Services, NGOs, local authorities, trade unions and employers | TCNs better integrate in their host communities and have faster access to job opportunities; employers can rely on TCNs with advanced language skills                                                                                                                  |
| 14                                                                       | Offering TCNs free language courses to reach B1 level proficiency, including on the job                                                                                | PES in partnership with language schools, NGOs and employers                                     | Both language and income barriers to formal employment are significantly reduced                                                                                                                                                                                       |
| 15                                                                       | Creating opportunities for TCNs to learn about the culture of their host communities                                                                                   | WS, NGOs, local authorities, trade unions                                                        | TCNs better adapt to their new life in the host country and make a steadier contribution to their host community                                                                                                                                                       |
| <b>Enhancing multi-stakeholder coordination</b>                          |                                                                                                                                                                        |                                                                                                  |                                                                                                                                                                                                                                                                        |
| 16                                                                       | Strengthening the coordination between different PA services in the early phase of TCN integration                                                                     | PES and Welcoming Services                                                                       | Better orientation of TCNs; more holistic support to basic services (e.g. housing, transport, sanitation, etc.); faster access to formal employment opportunities                                                                                                      |
| 17                                                                       | Establishing official coordination mechanisms or partnerships between public and private employment agencies                                                           | PES and private employment agencies                                                              | Reduced risk of TCNs accepting informal employment; better tracking the labour market integration of TCNs                                                                                                                                                              |
| 18                                                                       | Waiving formal education/ document requirements for refugees and humanitarian/ protection status holders                                                               | PES and training centres                                                                         | More inclusive vocational training; enabling formal skills validation through practical tests; allowing TCNs to access the formal labour market through training                                                                                                       |
| 19                                                                       | Establishing / expanding public-private cooperation to hire qualified TCNs                                                                                             | PES and employers                                                                                | Improved skills-matching; more predictable labour migration flows                                                                                                                                                                                                      |

|                                                                    | Proposed guideline                                                                                                                                                                          | Who should act?                                                                | Expected result                                                                                                                                                                                              |
|--------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 20                                                                 | Increasing labour inspections in relevant sectors (e.g. transport, domestic care, agriculture, etc.)                                                                                        | PES, Labour Inspectorates, employers and trade unions                          | Higher protection of TCN workers, including specific TCN groups (women, elderly TCN workers, etc.)                                                                                                           |
| 21                                                                 | Establishing formal partnerships with key diaspora/migrant communities                                                                                                                      | PES and migrant community leaders                                              | Better follow-up and support of working TCNs and their families, if applicable                                                                                                                               |
| 22                                                                 | Cross-country learning programmes with the focus countries of LABOUR-INT I, II and III                                                                                                      | PES from relevant focus countries, EMN                                         | Easier sharing of best practices, lessons learned and collective problem-solving of migrant integration challenges; promotion of successful integration models; preserved institutional memory across the EU |
| <b>Supporting and tracking TCN integration in host communities</b> |                                                                                                                                                                                             |                                                                                |                                                                                                                                                                                                              |
| 23                                                                 | Strengthening cross-cutting inclusion policies to facilitate TCN workers' access to housing, education, professional and language training, public health care and other essential services | National government, relevant Ministries, regional, city and local authorities | Social stability provides more certainty to TCNs. Their negotiating power to negotiate decent working conditions increases                                                                                   |
| 24                                                                 | Developing key integration indicators with host communities                                                                                                                                 | PES, community leaders, and migrant-led organisations                          | Regular follow-up based on shared assessments of TCNs' well-being                                                                                                                                            |
| 25                                                                 | Mainstreaming TCN data in local public registers                                                                                                                                            | PES, PA                                                                        | Higher data transparency and multi-stakeholder coordination between PES and other stakeholders; higher visibility of TCNs for the provision of basic social services                                         |

Some of these recommendations are not new. They reiterate suggestions made since the first edition of LABOUR-INT. This finding shows a similar pattern of opportunities and challenges in migrant integration across different EU countries<sup>9</sup>. As a point for further consideration, it would be useful to carry out a cross-country, longitudinal evaluation of the uptake of previous recommendations

made by LABOUR-INT. Carrying out such a study would go beyond the scope of the LABOUR-INT III project. However, it is highly recommended as a way to help PES officials and other stakeholders gain a deeper understanding of migrant integration challenges and strengthen institutional memory of best practices on migrant integration in the EU.

<sup>9</sup> Focus countries from LABOUR-INT 1 were: Belgium, Germany and Italy (Milan). Focus countries from LABOUR-INT 2 were: Austria, Italy (Naples) and Greece. Italy is the only focus country recurring in all three LABOUR-INT editions. While migrant integration in Italy follows a decentralised approach led by local authorities, Italy-related research findings would lend themselves well to a meta-evaluation or longitudinal study of TCN integration policies since 2016.

7.

## ▶ **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, project partners validated key research findings: namely, that language training is a central condition for TCNs' successful integration into their new community (#13, #14); the earlier this training begins, the better the outcomes are likely to be. They also stressed that integration support should not start only after arrival: accurate, practical information on rights, procedures, qualification recognition, skills validation and local opportunities should be shared as soon as possible, together with cultural orientation (#15).

The feedback received from EU-level stakeholders further highlighted the need to go beyond documenting existing practices and lessons learned (#22). Rather, deliberate efforts should be made to showcase positive examples that prove effective migrant integration is already happening and can be replicated. In that respect, the evidence points to several promising models, including local networks that bring together civil society, public entities, and employers; community level connections between TCNs and prospective employers; and one stop centers that combine information, language support, skills assessment, and job matching in a single access point. Research findings also support more tailored approaches for women and other TCN population groups, particularly by coupling language and vocational training with childcare or other flexible arrangements that reduce participation barriers. Finally, LABOUR-INT III project partners pointed to the value of documenting innovation and local experimentation, including cooperatives and other migrant led initiatives, as a way to show the agency of migrant entrepreneurs and to identify models that can be adapted elsewhere.

Overall, the feedback received is that successful long-term TCN integration depends not only on effective service delivery and decent working conditions, but also on the collective ability to combine key integration elements, such as early language learning, the provision of accurate and timely information, essential services, support from the local community, cultural mediation, and visible examples of agency that can be replicated to scale (#2, #22).

## 8.

 **CONCLUSION**

The analysis presented in this report highlights both the progress made and the persistent challenges in integrating TCNs in the labour markets of Bulgaria, Italy/Apulia region, Poland, and Slovenia. This section summarises key findings and main recommendations for PES and other stakeholders in focus countries.

While current initiatives demonstrate the potential of targeted migrant integration programmes in focus countries, significant gaps remain due to structural limitations such as understaffing in public administration, administrative delays, and limited labour migration pathways.

PES should focus on adopting a long-term, holistic approach that strengthens their capacity, fosters multi-stakeholder coordination, and reduces bureaucratic barriers. Emphasising language training, cultural orientation, and support for specific TCN groups, such as women, children, the elderly and TCNs with disabilities is crucial for enabling sustainable integration and enhancing social cohesion.

Of particular importance is the political commitment and resource allocation to migrant integration in focus countries. Political will and adequate resources are essential to transform project-based interventions into permanent, inclusive migration policies. By implementing the proposed guidelines, focus countries can build more resilient labour market systems that recognise TCNs' full talent and potential, ultimately benefiting migrants, employers and host communities. Moreover, cross-country collaboration among different PES and collective problem-solving on migrant integration challenges within the EU are essential for transferring best practices and building institutional memory. This collaborative approach can ensure that integration efforts keep pace with evolving migration trends.

9.

# ▶ ANNEXES

## 9.1

## LIST OF ORGANISATIONS, AGENCIES AND OTHER STAKEHOLDERS INTERVIEWED

### Chambers of Commerce and Employer associations:

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

### EU Institutions:

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

### Non-Governmental Organisations / Foundations:

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

### Public Service:

- ▶ Employment Service of Slovenia (ZRSZ-ESS)

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

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

### Trade Unions:

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

### Other stakeholders:

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

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