



BETWEEN EMIGRATION AND ATTRACTION:

Governance, Challenges, and EU Convergence

A Report on the Current Labour
Migration Management Infrastructure
in the Western Balkans



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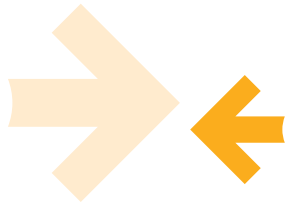


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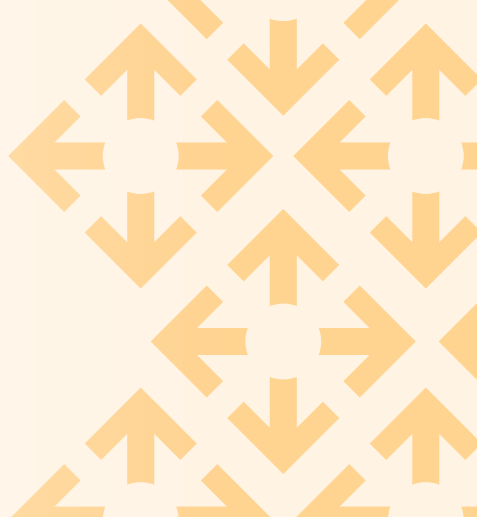


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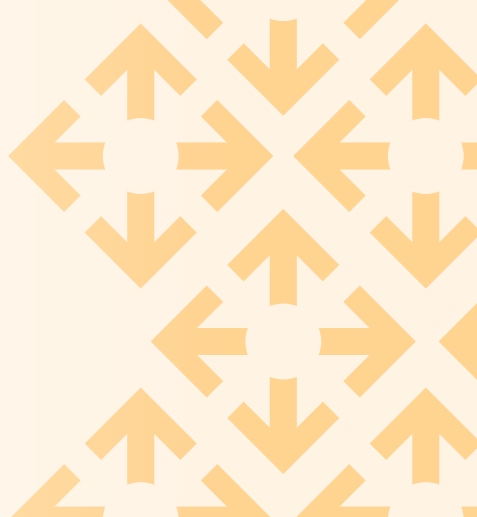
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1 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



Executive summary

The Western Balkans region — comprising Albania, Bosnia and Herzegovina (BiH), Kosovo*, Montenegro, North Macedonia, and Serbia — occupies a uniquely complex position in the European labour migration landscape. These economies simultaneously function as a major source of outward labour migration to the European Union and as an increasingly significant destination for workers arriving from third countries, particularly from Southeast Asia. This dual role generates governance challenges that no single economy within the region can adequately address in isolation.

This report provides the analytical foundation for the **Regional Roadmap to improve labour migration management and prevent secondary movements**. In-depth research was conducted between October 2025 and February 2026 in all Western Balkan partners, drawing on desk research, administrative data analysis, and key informant interviews with institutional stakeholders.

Approximately 25% of citizens from the region live abroad, reflecting decades of sustained outward mobility driven by wage disparities and limited domestic labour market absorption. These structural pressures have created acute and growing labour shortages in key sectors across the region. The same forces that drive emigration are also transforming the Western Balkans into a destination region. Incoming third-country workers are predominantly concentrated in construction, agriculture, and tourism — sectors most acutely affected by the departure of domestic workers. Foreign labour inflows have grown substantially in recent years, with several Western Balkan partners recording marked increases in work permits and residence authorisations issued to non-EU nationals. This trend is particularly pronounced in the construction sector, where labour demand has outpaced domestic supply, and in seasonal agriculture and hospitality. The countries of origin of incoming workers have diversified significantly, with workers from Nepal, Bangladesh, Pakistan, India, and several other Asian countries now forming a visible presence in the regional labour market. This diversification has placed new — and to a certain extent unanticipated — pressure on administrative systems, legal frameworks, and protection mechanisms.

2 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

INSTITUTIONAL FRAMEWORK: STRATEGIC AND OPERATIONAL LEVELS

The institutional landscape governing labour migration across the Western Balkans is characterised by fragmentation, overlapping mandates, and significant gaps in inter-agency cooperation. Multiple ministries and agencies — including ministries of interior, labour, foreign affairs, and employment agencies — hold responsibilities across different stages of the migration cycle, from visa issuance and work permit processing to labour inspection and migrant worker support. In several Western Balkan partners, this has resulted in unclear delineation of roles, duplication of administrative effort, and, critically, information asymmetries that limit effective oversight.

At the strategic level, coordination mechanisms exist in varying forms across the region. Some partners have established national coordination bodies or designated lead agencies for migration governance, while others rely on informal inter-ministerial consultation or sector-specific working groups. However, the effectiveness of these mechanisms is frequently undermined by inadequate resourcing and the absence of binding protocols for data sharing and joint decision-making.

At the operational level, gaps are more pronounced. Key informant interviews across the region consistently highlighted the absence of interoperable data systems as a critical bottleneck. Employment agencies, border authorities, labour inspectorates, and social services frequently operate with siloed data infrastructures that do not communicate in real time. This limits the ability of authorities to monitor the employment trajectories of foreign workers, identify individuals at risk, and detect irregular or exploitative labour arrangements in a timely manner.

LEGAL FRAMEWORKS: ADVANCEMENTS AND RECURRING GAPS

All Western Balkan partners have enacted primary legislation governing the admission, employment, and residence of foreign workers. In several cases, these frameworks have been significantly updated in recent years, reflecting both growing labour migration pressures and broader alignment with EU standards as part of the European integration agenda. Legislative reforms have introduced or strengthened provisions on work permit categories, employer obligations, and the regulation of private employment agencies (PEAs).

Despite these advances, stakeholders consulted highlighted the need for further updates to legal frameworks across the region — either to reflect current labour market developments and needs, to align more fully with EU legal frameworks and practices, or both.

The regulation of quota systems — mechanisms by which governments set annual limits on the number of work permits issued by sector or occupation — varies significantly across the region. In some partners, quota-setting processes are evidence-based and involve consultation with labour market stakeholders; in others, they are administratively determined without transparent methodology, leading to mismatches between official limits and actual labour market demand. Quota underutilisation in some sectors coexists with significant unofficial labour demand in the same or adjacent sectors, suggesting systemic failures in how formal migration channels are structured and communicated to employers and workers.

RECRUITMENT, ENTRY AND EMPLOYMENT OVERSIGHT

The recruitment of foreign workers in the Western Balkans is mediated by a complex ecosystem of actors, including direct employer recruitment, public employment services, and a growing number of private employment agencies operating both within the region and in countries of origin. Regulation of private employment agencies is uneven across Western Balkan partners, with significant variation in licensing requirements, operational standards, and supervisory oversight.

The Zero-Cost Principle — the internationally recognised standard that workers should not bear recruitment fees or related costs — is formally endorsed in the legal frameworks of several partners but remains inconsistently implemented in practice. Fee-charging by recruitment intermediaries, both licensed and unlicensed, remains widespread. Workers — particularly those from South and Southeast Asia — frequently incur substantial debts to fund recruitment and travel, creating financial vulnerability that can persist throughout employment and represents a significant risk factor for labour exploitation and debt bondage.

Work authorisation processes vary widely in complexity, processing time, and accessibility. In several partners, procedures are administratively burdensome for both employers and workers, contributing to delays that may push some migrants toward irregular channels. The digitalisation of permit application and processing systems has progressed unevenly, with some partners having made considerable advances while others continue to rely on paper-based procedures. Recognition of qualifications and verification of documentation submitted by workers from non-traditional countries of origin remain significant challenges, with limited capacity in several partners to authenticate foreign educational and professional credentials.

Labour inspection systems across the region are under-resourced relative to the scale of both formal and informal labour markets. Geographic coverage is uneven, and inspectors frequently lack the language skills, cultural competencies, and technical training required to effectively inspect workplaces employing non-European migrant workers. Inspection activity tends to be reactive — driven by complaints or referrals — rather than proactive and risk-based. Coverage of agriculture and domestic work, where vulnerability is highest, is particularly limited.

PROTECTION OF MIGRANT WORKERS: RIGHTS, VULNERABILITIES AND ACCESS TO REDRESS

The protection of migrant workers' rights emerges as a pressing concern. Workers from third countries — particularly from South Asia — are disproportionately concentrated in low-wage, high-risk occupations and are frequently employed in conditions falling below national labour law standards. Reported violations include non-payment or underpayment of wages, excessive working hours, inadequate accommodation, confiscation of travel documents, and denial of access to healthcare and other social services.

Access to grievance mechanisms is severely constrained by structural barriers. Language barriers are pervasive and limit workers' ability to understand their rights, communicate with authorities, or navigate administrative and judicial procedures. Fear of deportation or loss of employment — and therefore legal status — creates powerful disincentives to reporting violations or seeking assistance. Legal costs and the geographic inaccessibility of support services further undermine the effectiveness of formal redress mechanisms. Civil society organisations and trade unions, which often play a vital role in supporting migrant workers, have limited capacity and reach in several Western Balkan partners, particularly with respect to non-European workers.

INTERNATIONAL AND REGIONAL COOPERATION

Western Balkan economies participate in a range of bilateral and multilateral frameworks relevant to labour migration governance, including Skills Mobility Partnerships (SMPs) that link mobility with skills development and mutual recognition. Engagement with countries of origin — particularly in South Asia — has expanded in recent years, reflecting the growing importance of these migration corridors. However, cooperation frameworks vary considerably in scope, legal basis, and operational effectiveness.

Regional cooperation within the Western Balkans on labour migration governance remains at an early stage. While shared interests and common challenges exist, institutional mechanisms for regional coordination, data sharing, and joint policy development remain limited.

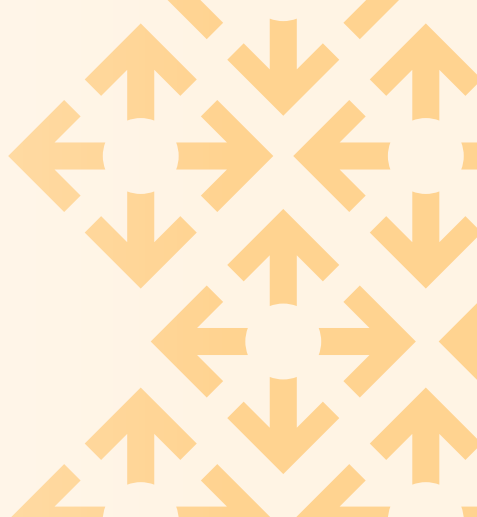
RISKS OF SECONDARY MOVEMENTS

A specific focus of the report is the risk of secondary irregular movements — the phenomenon whereby foreign workers who enter the Western Balkans through legal channels subsequently depart irregularly towards EU Member States. This risk is shaped by wage differentials, limited social integration, insecure legal status, and the absence of clear long-term regularisation pathways. While no statistical evidence was found to confirm the existence of this phenomenon, stakeholder perspectives indicate that it constitutes a structural governance risk requiring both enhanced worker protection and more coherent labour migration pathways to reduce incentives for irregular onward movement.

TOWARDS THE ROADMAP

Labour migration governance in the Western Balkans is increasingly shaped by strong employer demand and persistent labour shortages. Economies are now able to offer conditions attractive to workers from lower-income countries, while domestic labour supply is widely perceived as insufficient. This has driven a shift from more restrictive to more flexible admission frameworks. However, greater flexibility also necessitates stronger oversight to prevent misuse. As labour migration systems become more liberal, enhanced monitoring of foreign workers' movement, residence, and employer compliance is essential to prevent abuse by intermediaries and transitions into irregularity and onward movement towards the EU. Improved data exchange, interoperable systems, and strengthened inter-institutional coordination are critical for tracking workers across the migration cycle and identifying risks.

The Regional Roadmap developed under the PSIMM project proposes practical policy measures across five domains: strengthening legal and institutional frameworks; improving recruitment governance and regulation of private employment agencies; enhancing labour inspection and employment oversight; strengthening worker protection and access to justice; and deepening regional and international cooperation. The Roadmap is designed to be actionable within existing institutional arrangements while identifying areas requiring targeted capacity investment.



Acronyms and Abbreviations

BiH - Bosnia and Herzegovina

DCAM - Department for Citizenship, Asylum and Migration, Kosovo*

EA - Employment Agency, North Macedonia

EARK - Kosovo* Employment Agency

GAM - Government Authority on Migration

KAS - Kosovo* Agency of Statistics

KVIS - Kosovo* Visa Information System

MECI - Ministry of Economy, Culture and Innovation, Albania

MEL - Ministry of Economy and Labour, North Macedonia

MFAD - Ministry of Foreign Affairs and Diaspora, Kosovo*

MFLT - Ministry of Finance, Labour, and Transfers, Kosovo*

MIA - Ministry of Internal Affairs

Mol - Ministry of Interior

PEAs - Private Employment Agencies

PES - Public Employment Services, BiH

PSIMM - "Preventing Secondary Irregular Migration Movements to the EU" project

RS - Republika Srpska

NCM - National Coordinator for Migration, Kosovo*

NES - National Employment Service, Serbia

N-VIS - National Visa Information System, North Macedonia

SCRM - Commissariat

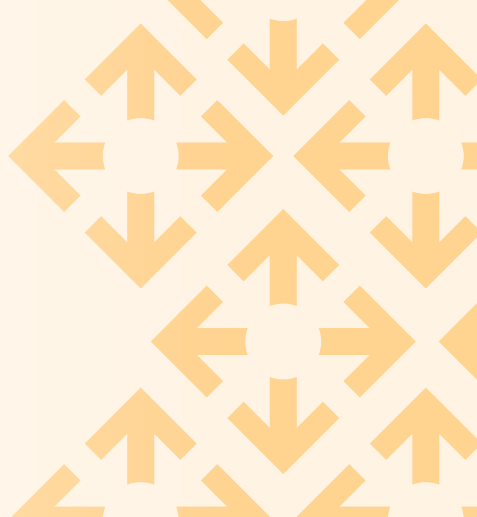
SIA - Security Information Agency, Serbia

SMP - Skills Mobility Partnerships

SOPs - Standard Operating Procedures

WBs - Western Balkans

3 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



➔ Working Definitions

Employer – a person or an entity that engages employees or workers, either directly or indirectly.⁴

Migrant worker - A person who is to be engaged, is engaged or has been engaged in a remunerated activity in a State of which they are not a national.⁵

Private Employment Agencies - natural or legal persons that provide labour market services, such as matching jobseekers with vacancies, while operating independently of public authorities. It applies to all categories of workers and across all branches of economic activity, with the sole exception of seafaring.⁶

Recruitment – includes the advertising, information dissemination, selection, transport, placement into employment and – for migrant workers – return to the country of origin where applicable. This applies to both jobseekers and those in an employment relationship⁷

Skills Mobility Partnerships (SMP) - bilateral or multilateral partnerships aimed at creating mutually beneficial outcomes by linking skills development with mobility, allowing migrants to enhance or acquire professional skills.

Zero Cost Principle - Workers shall not be charged directly or indirectly, in whole or in part, any fees or related costs for their recruitment. The terms ‘recruitment fees’ or ‘related costs’ refer to any fees or costs incurred in the recruitment process to secure employment or placement, regardless of the manner, timing or location of their imposition or collection.⁸

4 ILO (2019) General principles and operational guidelines for fair recruitment & Definitions of recruitment fees and related costs. International Labour Office - Fundamental Principles and Rights at Work Branch, Labour Migration Branch – Geneva: ILO, 2019.

5 UNHCR Master Glossary of Terms. <https://www.unhcr.org/glossary> (033.044.2026).2026)

6 Article 1 of ILO C181 – Private Employment Agencies Convention, 1997. https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEX_PUB:12100:0::NO:12100:P12100_INSTRUMENT_ID:312326:NO (30.04.2026)

7 ILO (2019)

8 ILO (2019).

➔ 1. Introduction



The **Western Balkans – Albania, Bosnia and Herzegovina (BiH), Kosovo*, Montenegro, North Macedonia and Serbia** – are a particular region in the field of labour migration because they share a fundamental dual role: they are simultaneously a **major sending region of labour force to the European Union** and a **rapidly emerging destination for labour migrants from third countries**. This duality generates common governance challenges that no single economy can resolve in isolation. “At the same

time, the region faces the dual challenge of continued emigration and growing labour shortages, a trend that requires coordinated national policies and enhanced regional collaboration”¹⁰ From a sending region perspective, the scale of outward mobility is worth noting, as nearly 25% of its citizens live abroad¹¹. This translates into acute labour-market needs, as WBs continue to face skills shortages in key sectors. What makes the region coherent from a governance standpoint is that the same structural drivers — demographic decline, wage gaps, and weak labour-market absorption — also position the Western Balkans as a growing destination for third-country nationals. Incoming workers are concentrated in construction, agriculture or tourism —the sectors facing shortages due to WBs emigration, demonstrating the region’s role as a relay zone in wider European labour chains.

This report takes stock of the current labour migration management infrastructure in the Western Balkans. It presents the main relevant governing and implementing institutions – both governmental and private stakeholders, governing legislation and procedures overseeing the employment of foreign workers, as well as recurring gaps and challenges in migration governance. In this sense, the report contributes to current knowledge on labour migration in the region by focusing on the meso-factors of mobility, such as migration management regimes and the role of private employment agencies as intermediaries¹².

9 *This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

10 World Bank Group (2026), Unlocking the Development Potential of Migration in the Western Balkans. <https://www.worldbank.org/en/region/eca/publication/unlocking-the-development-potential-of-migration-in-the-western-balkans> (27 April 2026).

11 Ghodsi, M., Ivanović, K., Leitner, M.S., Beckers, P. and De Lange, T. (2024), The impact of migration to the EU on labour shortages in the Western Balkans: Policy Implications. Wiiw Policy Notes and Reports 87. December 2024. <https://wiiw.ac.at/the-impact-of-migration-to-the-eu-on-labour-shortages-in-the-western-balkans-policy-implications-dlp-7087.pdf>, (27 April 2026).

12 Triandafyllidou, A. Shirazi, H. And Engbersen, G. (2024) Conceptualizing the Relationship between Skills and Migration. Link4Skills Concept Paper, 17 December 2024. https://link4skills.eu/wp-content/uploads/2025/09/L4S-WORKING-Paper_Migration-Skill-Corridors.pdf (27 April 2026).

The report was developed in the framework of the **Preventing Secondary Irregular Migration Movements to the EU (PSIMM) project**, which aims to strengthen the WBs' capacity to manage labour migration by addressing the challenges associated with the recruitment of foreign workers from emerging countries of origin for the WBs, particularly countries from South Asia. In addition to providing an overview of labour migration management in the region, the report offers the background for the **Regional Roadmap to improve labour migration management and prevent secondary movements**¹³. Recognising that foreign labour migration is becoming a structural component of Western Balkan economies, and that existing legal and policy frameworks remain limited in their capacity to retain foreign workers, the PSIMM Roadmap was developed to set out practical policy measures aimed at ensuring labour migration pathways remain both clear and protective of migrant workers and the domestic labour force.

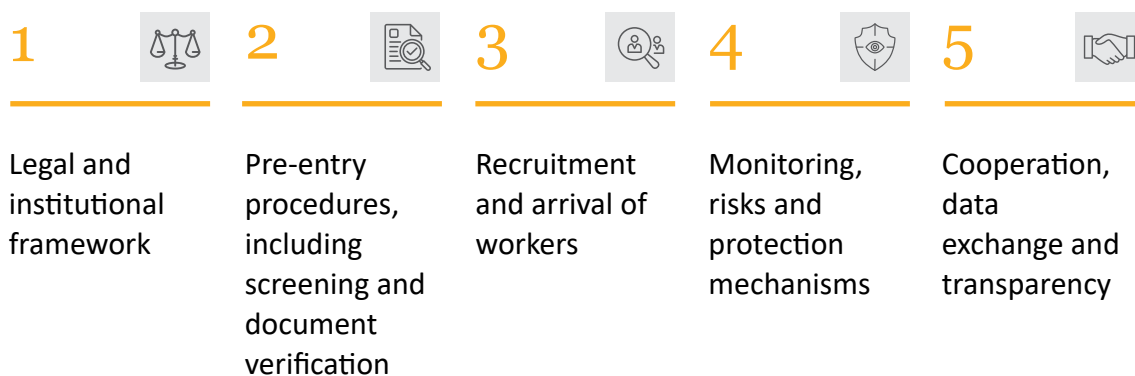
The report is structured as follows. The following two chapters briefly describe the research methodology used to develop the report (Chapter 2) and provide an overview of the broader context of foreign labour migration in the Western Balkans (Chapter 3). Chapters 4 and 5 examine the institutional and legal frameworks governing labour migration, including recurring limitations and gaps, as identified by experts consulted across the region. Chapter 6 presents the main findings related to current migration governance in the Western Balkans, with a particular focus on the recruitment, entry, and institutional oversight of foreign workers. Chapter 7 outlines the key findings related to the protection of migrant workers in the region. Chapter 8 describes the various international labour mobility frameworks in which Western Balkan partners participate, both at the regional level and through engagement with geographically more distant countries, particularly in South Asia. Chapter 9 summarises findings concerning the risks of secondary irregular movements from the Western Balkans to the European Union. Chapter 10 describes the process that led to the development of the Roadmap, while Chapter 11 presents the main conclusions and highlights the need for further targeted research in this area.

¹³ See chapter 10. Towards the roadmap.

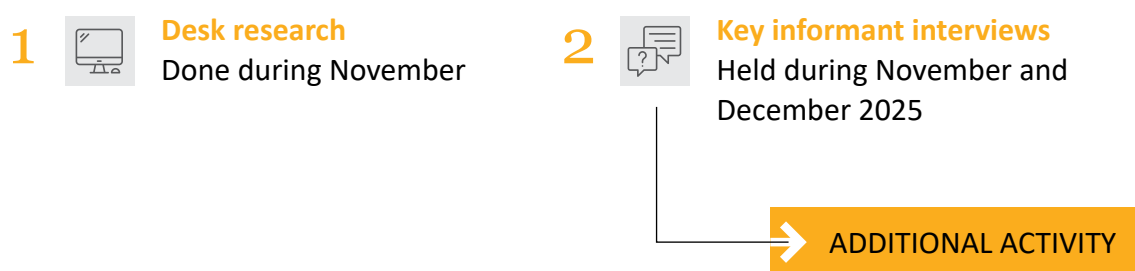
➔ 2. Methodology

RESEARCH OVERVIEW

↓ FIVE MAIN THEMATIC AREAS



➔ METHODOLOGY: TWO MAIN STAGES



In addition, two regional workshops were organised with the main national and regional stakeholders



REGIONAL WORKSHOP 1
November 2025



REGIONAL WORKSHOP 2
February 2026

This report is based on qualitative research conducted within the PSIMM project in all Western Balkans between October 2025 and February 2026. Research across the Western Balkan partners followed the same methodology to understand how labour migration is governed from recruitment to contract termination, including the practical challenges, as reported by the lead institutional stakeholders. Research covered five main thematic areas: the legal and institutional framework; pre-entry procedures, including screening and document verification; recruitment and arrival of workers; monitoring, risks and protection mechanisms; and cooperation, data exchange and transparency. The methodology employed was structured along two main stages:

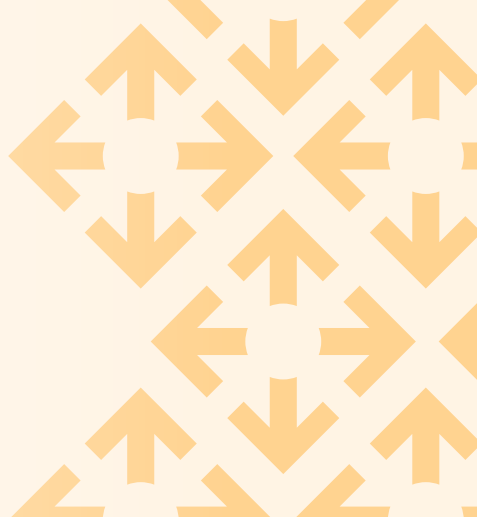
- **Desk research included an in-depth review** of the legal and policy landscape, encompassing relevant laws, regulations, strategies, administrative directives, and procedural guidance. The aim was to outline formal mandates, admission routes, and governance oversight duties. Desk research also included a basic mapping of the lead institutions responsible for core steps in the process and of the actors facing system gaps in practice. In addition, available administrative data and documentary evidence were examined, including statistics and institutional reports on permits and visas issued, quota utilisation, inspection activity etc.
- **Key informant interviews were conducted with relevant stakeholders**, both at policymaking and practitioner-level. The aim of the interviews was twofold – for collecting primary data and supporting the engagement of stakeholders throughout the project, and also for capturing stakeholder’s views regarding labour migration management, including limitations and possible solutions. Interviews employed a semi-structured format based on similar themes but adapted to institutional mandates. Interviews were conducted with informed consent, and notes from these interviews were anonymised in accordance with research ethics guidelines and data protection regulations.

In addition, **two regional workshops were organised with the main national and regional stakeholders in November 2025 and February 2026**. The first workshop brought together representatives of employment services, labour inspectorates, ministries responsible for social policy, foreign affairs, and the ministries of interior. The objectives of the workshop were to verify preliminary findings, identify remaining data gaps within the scope defined by the methodology, exchange reflections on national practices, and initiate the co-design of the future Regional Roadmap framework.

The second regional workshop brought together all relevant stakeholders with the aim of validating and further refining the findings of this background report, as well as jointly shaping a practical, regionally aligned Roadmap to improve procedures for screening and verification of foreign workers.

In terms of **limitations of the overall approach, three points are worth noting**. Firstly, due to the focus on labour migration, the entry point into the current labour migration situation has been through institutions mandated with responsibilities primarily geared towards labour migration, with limited insight into other related areas, such as addressing extreme exploitation or trafficking in human beings. However, these policies were explicitly mentioned by stakeholders when referring to the implementation of broader labour migration policies. Therefore, for example, when it comes to redress mechanisms, the data collected refers to complaint mechanisms pertaining to the labour inspectorate, rather than to complaints involving abuses that would also qualify for reporting to law enforcement.

Secondly, due to different procedures and data production approaches, available administrative data about permits, visas issued, and quota utilisation is not fully comparable across the WBs, thus this part of the analysis remains limited. Finally, no migrant workers were consulted for this overview, therefore the limitations, gaps and needs reported with regard to current policies and the improvements required reflect the views of the consulted institutional stakeholders involved in labour migration governance in the WBs.



3. Context

All Western Balkans partners have long been characterised by outward labour migration. In recent years, reports have highlighted a shrinking and ageing workforce, while employers have faced difficulties filling job vacancies, especially in particular sectors and during seasonal peaks. More than one in five people from the region live abroad, and net outflows continue to reduce the working-age population.¹⁴ With unemployment rates at approximately 10–13% – exceeding the EU average (about 6%)¹⁵ – the pressure on the labour market persists, but shortages are becoming more specific to certain occupations and local areas.¹⁶ Recent data underscores the scale and urgency of labour migration challenges facing the Western Balkans. In May 2025, it was highlighted that demand for migrant workers in the region more than doubled between 2018 and 2024, with over 100,000 work permits issued to foreign workers in 2024 compared to 46,000 in 2018.¹⁷ This dramatic increase occurs against a backdrop of record-high employment rates (56.5% in 2023) and record-low unemployment (12% in 2023). Yet 40% of employers report being unable to recruit workers with the needed skills due to rapid population decline.¹⁸ Simultaneously, the region continues to experience sustained net emigration, particularly among young and educated population, creating a complex dual challenge of labour shortages at home and brain drain abroad.¹⁹ Against this backdrop, the region faces several challenges – managing inward labour migration to address skills shortages in key sectors, ensuring adequate protection for foreign workers, addressing current unemployment rates through quota systems and labour market tests, and providing reskilling and upskilling opportunities for the domestic labour force²⁰. For instance, a recent analysis by the Labour and Employment Agency of Bosnia and Herzegovina (LEA-BiH) highlights the dual challenge faced by the labour market²¹. On one hand, policy and regulatory frameworks remain oriented toward protecting the domestic workforce, even as a substantial portion of which is emigrating in search of better opportunities abroad. On the other hand, restrictive policies and administrative barriers limit employers' ability to recruit foreign workers. This dual challenge leaves employers in BiH unable to secure the workforce needed to sustain operations, contributing to persistent labour shortages.

14 OECD (2022), *Labour Migration in the Western Balkans: Mapping Patterns, Addressing Challenges and Reaping Benefits* Mapping Patterns, Addressing Challenges and Reaping Benefits, OECD Publishing, Paris, <https://doi.org/10.1787/af3db4f9-en>.

15 Euro area unemployment at 6.4% - Euro indicators - Eurostat

16 According to interviewed stakeholders, in Montenegro, the unemployment rate in coastal municipalities is significantly lower than the overall unemployment rate (Interview MNE_03).

17 International Organization for Migration. (2025, May 15). Western Balkan partners unite to harness labour migration for economic growth. IOM Montenegro. <https://montenegro.iom.int/news/western-balkan-partners-unite-harness-labour-migration-economic-growth>

18 Idem.

19 De Silva, S. (2024). *Labour Migration in the Western Balkans. Consequences for the Region's Democratic Life*. Policy Brief. Foundation for European Progressive Studies. Karl-Renner-Institut. CeSPI. *The-Western-Balkans-labour-migration-1.pdf* (18 April 2026)

20 OECD (2025), *Economic Convergence Scoreboard for the Western Balkans 2025*, OECD Publishing, Paris, <https://doi.org/10.1787/bc0babf3-en>. (18 April 2026)

21 LEA-BiH (2024), *Analysis of the Problems Employers Face in Finding the Required Domestic and Foreign Workforce with Proposals for Improvement*. <https://www.arz.gov.ba/Dokumenti/Fajlovi/Analiza%20final.pdf> (27 April 2026).

3.1 Sectors with a High Foreign Labour Force

Sectors that recruit foreign workers across the different Western Balkan economies generally include construction, tourism/hospitality and service sectors, manufacturing (BiH and Kosovo*) and trade (Montenegro and Serbia). In Kosovo*, Montenegro and Serbia, information and communication technologies are a sector increasingly associated with the recruitment of foreign workers. Table 1 below provides an indicative overview of sectors that employ foreign workers and the countries of origin of these workers.

Table 1: General overview of sectors with the highest foreign labour force and countries of origin (CoO) of foreign workers²³

	Sectors	CoO
Albania	Construction, tourism ²⁴ , agriculture	India, the Philippines, Türkiye, Bangladesh
BiH	Construction, manufacturing, hospitality, and services	Türkiye, Nepal, Serbia, India, Bangladesh
Kosovo*	Construction, manufacturing, agriculture, hospitality and services. Information and Communication Technology sector is increasingly employing foreign professionals in software development, network administration, and technical support.	Albania, Türkiye, North Macedonia, Serbia. Outside the region, significant numbers of workers come from Bangladesh, Nepal, India, and the Philippines. Smaller groups or groups applying in certain periods have also come from Pakistan, Afghanistan, and Syria.
Montenegro	Construction, accommodation and food services. More recently other sectors employ foreign workers: retail trade, professional and technical activities ²⁶ , and information and communication.	Russian Federation, Serbia, Türkiye, BiH, Albania
North Macedonia	Construction and hospitality	Recruitment is increasingly sourced from further afield, particularly from India, Bangladesh, and Nepal.
Serbia	Construction, trade, transport, service sectors, and to a more limited extent, the IT sector.	China, Türkiye, India began to emerge in 2021 as significant sources of workers. Since 2022, Russians have become the dominant group in approved temporary residences, especially in IT. Since 2023, there has been an increasing diversification of source countries for lower-skilled labour, with notable growth in workers from Nepal, Uzbekistan, and Sri Lanka.

²² * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

²³ The sectors and countries of origin presented below should not be understood as exhaustive, but rather as reflecting the main patterns identified through available data, secondary sources and stakeholder consultations at the time of drafting.

Within these shared challenges, WBs' economies display some noteworthy specificities when managing the foreign labour force. In Albania, for instance, informality remains a significant concern, as informal employment accounts for an estimated 29% of total employment, excluding the agricultural sector.²⁷ Furthermore, according to stakeholders interviewed, no institution systematically captures the presence of foreign workers in tourism and agriculture, the two sectors with the highest levels of informality.²⁸ According to official data from the Statistical Offices, the total number of foreigners with residence permits in Albania dramatically increased over the five-year period, from 13,609 in 2020 to 21,940 in 2024. The dominant reason for obtaining a residence permit was employment, which consistently accounted for the largest category, rising from 6,465 permits (47.5% of the total) in 2020 to 11,908 permits (54.3% of the total) in 2024. (See Annex 2)

In BiH, work-permit data shows a predominance of new permits over permit extensions, suggesting limited workforce retention. Private sector stakeholders advocated extending residence permits to at least two years, which would allow foreign workers to plan their stay in BiH and ease retention. Stakeholders interviewed noted that some employers report a preference for recruiting married couples as a strategy to encourage longer stays. The picture is different in Kosovo*, where although the total number of permits for employment purposes almost doubled between 2021 (2217 permits) and 2024 (4273 permits)²⁹ (see Annex 2), most of these are renewals from previous years. Despite retention and efforts to attract foreign workers, the inflow of foreign workers has proven insufficient to fill the deficit, as annual net emigration significantly exceeds immigration³⁰.

In Montenegro, the number of temporary residence and work permits issued to foreigners (within and outside the quota system) increased by approximately 38% between 2019 (27624 total permits) and 2024 (38019 total permits) (See Annex 2). Perhaps unlike other WB partners, disaggregated data further reveals an increase in the number of temporary residence and work permits issued to executive directors and entrepreneurs registered in Montenegro, indicating a rise in foreign-led business activity and self-employment.

Historically, North Macedonia has been a destination country for seasonal workers from Kosovo*, Albania and Türkiye, and the Open Balkan initiative has further facilitated these regional inflows, by allowing citizens from Albania and Serbia to access the Macedonian labour market via simplified electronic identification, effectively removing work permit access limitations. Aggregated work permit data from the Ministry of Interior (Moi) for the period 2019 – 2025 illustrates a trend toward

24 Official state reports, such as the Annual National Migration Profile for 2023 and Annual National Migration Profile for 2024, employ the term “accommodation and food services”, however highlighting that the demand for accommodation and food services is directly linked to the expansion of the tourism industry. During interviews and regional workshops, stakeholders consulted used the term tourism.

25 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

26 According to the Law on the Classification of Activities, it comprises specialized professional, scientific, and technical activities. The performance of these activities requires a high level of training, as well as the possession of specialized knowledge and expertise, which are made available to users (for example legal and accounting jobs, management activities and management consultancy etc).

27 European Commission. Albania 2024 Report. 2024. (Brussels: European Commission, 2024). Accessed October 5, 2025. https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

28 Interview ALB_6.

29 GAP Institute (2025). Emigration and the labour market in Kosovo*: The untapped potential of the inactive force. https://www.institutigap.org/documents/11538_Emigrationaandlabormarket.pdf. (22 April 2026).

30 Idem.

more distant, non-neighbouring countries, such as India (929 work permits granted in this period), Bangladesh (821) and Nepal (671) (see Table 1 and Annex 2).

Regarding Serbia, it is worth noting that at the beginning of the decade, family reunification was the predominant legal ground for foreigners' residence. Over time, however, this trend changed significantly in favour of labour-related grounds, with employment becoming the dominant driver of immigration. Data from the National Employment Service (NES) indicates a steady increase in the number of issued work permits, which nearly tripled between 2019 and 2023 (See Annex 2). Also worth noting is that, since 2022, Russian workers have become the dominant group in approved temporary residence permits, reflecting a large inflow of highly skilled professionals, particularly in the IT sector. Another aspect worth noting is emergence of a dual labour migration pattern, especially evident in 2023-2024. On the one hand, Russian nationals continued to dominate approved residences and, later, single residence and work permits. On the other hand, D visa data shows increasing diversification of source countries for low-skilled labour, with evident rise in workers from Nepal, Uzbekistan, and Sri Lanka.

3.2. Quota-Based Regulation of Labour Migration

Across the Western Balkans, quota systems are among the central policy instruments for regulating labour migration and protecting domestic labour markets, although their scope and restrictiveness vary across economies. **Quota-based approaches** are present in **Albania, BiH, Kosovo***, **Montenegro and North Macedonia**. At the same time, **Serbia** represents an exception, **relying primarily on labour market tests as the main safeguard for protecting employment opportunities of the domestic workforce**. By setting annual numerical limits on the number of foreign workers who may access the labour market, governments seek to retain control over the scale and structure of labour migration inflows. Quotas are typically disaggregated by occupation, or type of employment (including seasonal work), and in some cases also reflect territorial labour market needs as is the case in BiH.

Quota systems function as an additional regulatory layer within labour migration frameworks that already define access to the labour market at the individual level. While individual procedures determine eligibility for residence and work on a case-by-case basis, quota systems introduce a macro-level condition by linking access to employment to the availability of quota allocations. In practice, this means that foreign workers must both meet individual admission requirements and fall within the established quota limits, which may increase the administrative complexity of the process. At the same time, quota systems in the region are not rigid caps, but incorporate a degree of flexibility. For instance, in **Montenegro, competent authorities may adjust the number and structure of quotas annually in line with labour market demand**. Across all quota-based systems in the region, exemptions are provided for specific categories of workers, particularly those considered strategically important, highly skilled, or otherwise necessary for economic development. This results in a dual structure, in which employment is regulated both within and outside the quota framework.

In principle, quotas are determined based on assessments of labour market needs. However, in

31 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

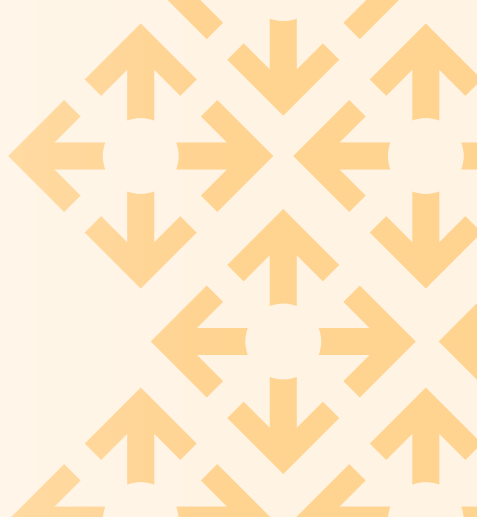
practice, these assessments are often based on general estimates and institutional perceptions rather than comprehensive, evidence-based data, particularly in contexts where there is no systematic obligation for employers to report labour shortages. As a result, quota-setting may not be fully grounded in reliable labour market intelligence, nor do they necessarily indicate the absence of available domestic workers for specific occupations. This raises questions about the extent to which quota systems effectively match labour supply and demand in practice.

This points to the need to further strengthen the strategic and long-term dimension of labour migration management, including improved labour market analysis, enhanced forecasting capacities, and clearer positioning of foreign workers within national labour markets, while maintaining protection of the domestic workforce. In this context, the effectiveness of existing policy mechanisms — including quota systems — should continue to be examined. In discussions with stakeholders, one of the ideas raised for further consideration was the potential shift from quota-based systems to more flexible approaches, such as the use of shortage occupation lists. Such approaches could, if properly designed and regularly updated, provide a more responsive mechanism for aligning labour migration with actual labour market needs.

The **Federation of Bosnia and Herzegovina recently amended key legislation to introduce a list of shortage occupations** in which employers can hire a foreign worker without a labour market test.³² The list of occupations, drawn yearly by the Federal Employment Agency, for the upcoming year, together with the Economic and Social Council and with the approval of the Federal Ministry of Labour and Social Policy, is expected to be based, inter alia, on market needs.³³ This is expected to both, keep safeguarding the domestic labour force, and speed up the employment process.

32 Sarajevo Times (2026), Blog. Business. The Federation of BiH introduces easier Employment of Foreigners. <https://sarajevotimes.com/the-federation-of-bih-introduces-easier-employment-of-foreigners/> (22 April 2026)

33 Idem.



➔ 4. Institutional Framework

In all WB economies, dedicated institutions for labour migration management, typically within Ministries of Interior and Ministries of Labour, including employment services, and labour inspectorates are well established. However, the degree of institutional complexity varies significantly. For instance, relevant policymaking in Albania, Montenegro, and Serbia is relatively centralised, while Bosnia and Herzegovina presents a more fragmented structure due to its multi-level governance across the state, entity and district levels, namely Bosnia and Herzegovina, the Federation of Bosnia and Herzegovina, Republika Srpska and the Brčko District of Bosnia and Herzegovina. For key institutions relevant to labour migration governance in each Western Balkan partner, see Annex 1.

In **Albania, core responsibilities on migration management are shared between various relevant ministries and their respective agencies**, namely Ministry of Health and Social Protection which develops health and social care policies also for migrants, as well as the Ministry for Europe and Foreign Affairs (MEFA) with responsibilities for negotiating relevant international cooperation agreements in the field of migration and for visa issuing through diplomatic and consular channels.

³⁴Although private employment agencies (PEAs) are not embedded within the public governance structure, it is worth noting that they play a significant role in the recruitment of migrant workers.

Bosnia and Herzegovina (BiH) has the most complex institutional architecture in the region, through its multi-layered governance across state, entity and district levels, reflecting the country's constitution. Migration governance in BiH involves a range of institutions operating within the country's complex constitutional framework. Under the Dayton Peace Agreement³⁵, cross-border affairs (including international migration) fall under the mandate of the state-level institutions. Key institutions relevant for labour migration to BiH include security sector bodies, notably the Ministry of Security and the Service for Foreigners' Affairs, as well as intelligence authorities, the Ministry of Foreign Affairs, and Public Employment Services (PES) operating at state, entity, and cantonal levels. Security-sector institutions exercise significant authority over administrative procedures, particularly the issuance of residence permits, while PES are deeply involved in defining quotas.

In **Kosovo***, the Ministry of Internal Affairs (MIA), with its relevant departments and directorates, is the central authority responsible for migration policies, border management, the oversight of

³⁴ In 2022, Albania issued National Guidelines on Ethical Recruitment which sets out national and international standards applicable to PEAs, employers of migrant workers and migrant workers themselves.

³⁵ See OSCE Mission to Bosnia and Herzegovina, Dayton Peace Agreement. Available at <https://bih.osce.org/bih/126173> (11.04.2026)

³⁶ * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

migration flows and the integration of foreigners. The Ministry of Finance, Labour, and Transfers (MFLT), with its respective agencies, is the competent authority responsible for drafting employment and vocational training policies and for assessing the financial implications of migration policies. The Ministry of Foreign Affairs and Diaspora (MFAD) is responsible for concluding agreements within this area (e.g. bilateral readmission agreements).

The Ministry of Labour and Social Welfare is the lead institution responsible for shaping **Montenegro's** policy on the employment and work of foreigners. The Ministry of Interior (MoI) is a central authority in labour migration management, exercising both decision-making and oversight functions. The Ministry of Foreign Affairs, through its relevant departments, is responsible for issuing visas through its diplomatic and consular missions. The Labour Inspectorate Department, operating under the Ministry of Labour and Social Welfare (after the transformation of the former Administration for Inspection Affairs) is responsible for supervising compliance with labour and employment legislation and related by-laws. Employment Agency Montenegro is a public authority that implements employment mediation and labour-market measures under the Law on Employment Mediation and Rights During Unemployment. In procedures for deciding on applications for a D visa and for a residence and work permit, the Agency for National Security of Montenegro receives the application for security clearance from the competent authority.

In **North Macedonia**, the Ministry of Economy and Labour (MEL) provides strategic oversight of the labour market, regulates working conditions and supervises private employment agencies. Two institutions operate under MEL, the Employment Agency (EA) and the State Labour Inspectorate (Labour Inspectorate). While the EA is the principal labour-market “gatekeeper” for foreign employment (through work permits for foreign nationals, and the formal labour-market opinion that underpins employment-related temporary residence decisions)³⁷, the Labour Inspectorate is responsible for enforcing labour legislation, conducting inspections, and protecting the rights of all workers, including foreign nationals. In parallel, the Ministry of Interior (MoI) regulates the stay of foreign nationals (i.e. issuance of temporary residence permits for employment purposes, as well as border control functions carried out by the Border Police). The Ministry of Foreign Affairs (MFA) facilitates labour migration by processing visa applications through diplomatic and consular missions abroad. The MFA also supports bilateral agreements and international cooperation initiatives related to labour migration. From a social protection and integration perspective, the Ministry of Social Policy, Demography, and Youth is responsible for the design and implementation of social protection policies, including the provision of integration services for migrant workers.

The institutional architecture governing labour migration in **Serbia** is characterised by a clear formal division of competences among several key institutions. MoI plays a central role as the authority responsible for deciding on applications for long-stay visas and single residence and work permits. The Ministry of Labour, Employment, Veteran and Social Affairs holds legislative and supervisory responsibilities in the field of employment. Within this ministry, the Labour Inspectorate is tasked with inspection oversight, occupational safety and health, and compliance with legal conditions for employing foreign nationals. The Ministry of Foreign Affairs facilitates visa issuance through Serbia's diplomatic and consular network and participates in the initial verification of documentation

37 “Програма на АВРСМ” [Programme of the AVRSM], Employment Service Agency of the Republic of North Macedonia, <https://av.gov.mk/programa-na-avrm.nsp>

submitted abroad. The Security Information Agency (SIA) participates in the process by conducting security risk assessments, which are a mandatory component of decision-making for both visa and single permit applications.

4.1 Inter-Institutional Coordination

While the above-mentioned institutions have well-established mandates in the field of labour migration management, there are notable differences concerning the scope and functionality of inter-agency coordination at strategic and operational levels.

In this report, strategic-level inter-institutional coordination refers to a coordinated approach across different national institutions to address the challenges and opportunities posed by migration. This is provided through the development of comprehensive national migration strategies, their implementation and evaluation. This also includes coordination mechanisms that are established with the view of WBs' EU integration.³⁸

Operational-level implementation refers to the daily institutional activities, such as data exchange and case management. Most WB partners have adopted or (at the time the research for this study was conducted) are in the process of developing/ updating strategic documents that focus on the issue of labour migration management directly or address it marginally. At the level of strategic approaches, differences relate to whether labour migration is addressed within a broader migration governance framework (as in Albania and Montenegro), whether it is addressed primarily through other instruments which intersect with migration (as in Serbia) and/or whether there is a cross-sectoral strategic approach to labour migration (as in BiH and Serbia). Below, we briefly mention the strategic documents and the institutions involved, first at the strategic level and then at the operational level of coordination.

4.1.1. Strategic-Level Coordination

In the Western Balkans, inter-agency coordination and its mandate vary. Strategic coordination is employed through inter-agency bodies, steering committees, expert-level groups, etc. Most WB have coordination mechanisms covering migration broadly and labour migration is sometimes formally included within the mandate or agenda of these bodies.

In Albania, for instance, the most important document is the **National Migration Strategy (2024–2030), along with its Action Plan (2024–2026)**. It is a comprehensive roadmap for Albania's migration governance which foresees, inter alia, the development of effective labour migration policies. In addition, the National Employment and Skills Strategy (2024 – 2030) and its Action Plan set out a vision of ensuring quality employment and lifelong training for all, with core policy goals concentrated on strengthening skills development, enabling the supply of labour force to be better matched within the labour market, and implementing inclusive labour policies that promote decent work for all individuals, including migrants. In Albania, strategic-level coordination in the area of migration is facilitated (through committees, coordination bodies, and inter-agency working groups)³⁹

38 EP (A) Fact Sheets on the European Union. The Western Balkans. https://www.europarl.europa.eu/erpl-app-public/factsheets/pdf/en/FTU_5.5.2.pdf (30 April 2026).

39 Interview ALB_1.

four main levels: 1) the Migration Steering Group at the level of vice ministers, which may provide recommendations to the Council of Ministers; 2) the Technical Committee on Migration, which includes all implementing institutions at the level of general directorates; 3) the Technical Secretariat for Monitoring the Implementation of the Strategy, harmonising information, identifying data gaps, and conducting trend analysis; and 4) designated contact persons in each ministry.⁴⁰

In **Bosnia and Herzegovina**, the **Coordination Body for Migration Issues of Bosnia and Herzegovina, appointed in 2013**, is in charge of continuously reviewing the overall situation in the field of migration and asylum, fostering and ensuring inter-ministerial cooperation between relevant institutions dealing with migration and asylum, as well as assessing future migration trends and proposing measures to improve migration policies and strategic documents. In addition, it oversees the implementation of strategic documents. The Coordination Body is composed of high-ranking officials from relevant sectors and agencies of all ministries with migration-related issues under their remit – the Ministry of Security, the Ministry of Foreign Affairs, the Ministry of Human Rights and Refugees etc. (See Annex 1). At the time this research was conducted, neither the four Action Plans on Immigration (implemented consecutively from 2008 to 2016), nor the Strategy in the Area of Migrations and Asylum and its Action Plan (2016 - 2020) had an official follow-up.

In **Kosovo***, at the time this research was conducted, **the National Migration Strategy** (spanning until 2025) was set to expire, and a working group has been established to prepare the forthcoming Migration Strategy for the period 2026–2030, with its finalisation planned for March 2026⁴². At the strategic level, coordination is facilitated through inter-agency bodies and institutional mechanisms, with several formal coordination mechanisms. The National Coordinator for Migration (NCM) is responsible for coordinating, monitoring, and reporting on the implementation of migration policies, activities, and actions. It steers migration policy development and facilitates policy implementation and monitoring. The Government Authority on Migration (GAM), established in 2013, is an inter-institutional body that coordinates policies related to migration management, advises the National Coordinator for Migration, drafts the National Migration Strategy, and generally provides expertise in the field of migration.

In **Montenegro**, at the time of this research, labour migration was addressed at the strategic and policy levels primarily through the Strategy on Migration and Reintegration of Returnees (2021 – 2025). The Strategy integrated labour migration within a broader migration governance framework and recognised foreign workers as potential contributors to the labour market and economic growth. Stakeholders consulted highlighted the relevance of the Strategy for Combating Trafficking in Human Beings (2019 – 2024), based on which joint inspections involving labour inspectors and police officers have improved the detection and preliminary identification of cases of labour exploitation⁴³. Montenegro does not have a permanent inter-institutional coordination body or committee with a mandate to coordinate labour migration policy. Nevertheless, certain forms of strategic coordination and inter-institutional cooperation are present through participatory processes related to annual quota proposals, as well as through working groups established in the context of the EU accession process and legislative reforms.

40 Interview ALB_4.

41 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

42 Interview KOS_6.

43 Government of Montenegro (2025), Final Report on the Implementation of the Strategy for Combating Trafficking in Human Beings 2019–2024. Podgorica: Government of Montenegro.

Strategic oversight of employment and migration policy in **North Macedonia** is led by the Ministry of Economy and Labour (MEL), particularly through the Employment Agency (EA), and by the Ministry of Internal Affairs. Broader migration policy is managed through an Inter-Ministerial Body comprising key ministries and international partners, ensuring coherent implementation of the Resolution on Migration Policy 2021–2025. The Resolution on Migration Policy 2021–2025 establishes a strategic framework for managing the entry of foreigners into North Macedonia. It emphasises the use of an appropriate visa policy to address labour market shortages while ensuring that migration aligns with the country's broader employment and development objectives. In *2025 the Ministry of Social Policy, Demography and Youth is drafting a Strategy on the Integration of Foreigners and Migrants, which will be submitted to the Government. The draft version is expected to be ready by the end of December 2025.* In parallel, the Ministry of Social Policy, Demography and Youth is preparing a new Strategy on the Integration of Foreigners and Migrants, which is expected to establish a formal coordination body at the technical and state secretary levels and is scheduled for submission to the Government once the draft is finalized by the end of December 2025.

In **Serbia**, coordination between key institutions is pursued through various inter-ministerial bodies, councils, and working groups established under broader strategic and policy documents related to migration management and employment (or specific legislative initiatives). There is no coordination body with main mandate to monitor labour market mobility and protect the rights of foreign workers. Nevertheless, certain strategic coordination mechanisms established to address related sectoral issues have indirectly contributed to strengthening the governance of labour migration. A notable example is the coordination framework under the national Programme for the fight against human trafficking in the Republic of Serbia for the period 2024–2029, whose action plan envisaged and implemented measures to strengthen responses to trafficking for the purpose of labour exploitation.

4.1.2. Operational-Level Coordination: Key Mechanisms

The above-mentioned strategic approaches or the lack thereof translates into a diverse picture in the operational-level coordination. From a practical perspective, cooperation at the operational level occurs across different labour migration management phases – regarding the assessment of conditions in issuing visas/permits, for case management or oversight. Below are examples of how this level of cooperation takes place, as highlighted by the stakeholders interviewed. Operational-level coordination through data systems and data sharing is addressed in a separate sub-section.

In **Albania**, operational-level coordination is centred on **the Single Permit system**, which is jointly used by the key institutions involved in labour migration procedures. The Department for Border and Migration (DBM) is the authority that ultimately issues the Single Permit, but it does so only after receiving the required confirmations from the National Agency for Employment and Skills (NAES) and, when necessary, from the Ministry for Europe and Foreign Affairs (MEFA). All steps in the procedure are submitted and processed online through the E-Visa system and the E-Albania platform, creating a shared digital workflow that functions as a practical case management mechanism across these institutions.⁴⁴ Furthermore, operational coordination is facilitated by national electronic databases – The National Register of Licenses, Authorisations and Permits, administered by the NBC, and the National Electronic Register of Foreigners – and through joint instructions that define institutional responsibilities and procedures for information sharing.

44 Interview ALB_1.

In **Bosnia and Herzegovina**, the Agency for Labour and Employment of Bosnia and Herzegovina plays a coordination role at the operational level. Due to the complex administrative structure and different decision and implementation levels, the stakeholder interviews conducted reveal overlapping mandates and limited communication between line ministries, employment offices and the Service for Foreigners' Affairs, to name just a few from the complex institutional landscape (See Annex 1). It is worth noting that a significant procedural change was introduced through a **Protocol signed in August 2025 between the Ministry of Foreign Affairs and the Service for Foreigners' Affairs**. This Protocol will allow residence permit applications to be submitted via diplomatic-consular offices. This procedural change has the potential to reduce overall processing times, to 2–2.5 months in the Federation of BiH and even less in the Republika Srpska (RS).

In **Kosovo***, most notable coordination at the operational level takes place regarding the issuance of work and residence permits, requiring **mandatory coordination between the Ministry of Internal Affairs (MIA) and the Employment Agency (EARK)**. In addition, there are several standard operating procedure and highly detailed administrative instructions that govern various aspects of foreign worker migration, border management, and specialized service provision. Primarily within the domain of enforcement and security. The implementation of the Integrated Border Management system, for instance, relies on several approved SOPs⁴⁶. Furthermore, SOPs are established for handling vulnerable persons, such as trafficking victims.

Stakeholders interviewed in **Montenegro** highlighted the existence of coordination mechanisms at both national and local levels. However, these **mechanisms primarily focus on assisting returnees under readmission agreements**, persons in need of international protection, and individuals requiring humanitarian assistance. Local teams supporting foreign nationals operate in all larger municipalities and typically include representatives of Centres for Social Work, the Red Cross, the Employment Service, the Ministry of Interior, the Police Directorate, and local self-government units. When a foreign national arrives—whether at a border crossing or upon submitting an application for international protection—these local teams seek to address immediate needs and provide initial support to resolve the person's situation.

In **North Macedonia**, **operational coordination for the employment of foreign workers is legally structured to link residence status with work authorisation** through the single permit procedure, managed by the Ministry of Interior (Mol) in cooperation with the Employment Agency (EA). Mol issues residence permits for work only after obtaining a positive opinion from the EA, which assesses labour market needs and compliance with established quotas. Data exchange between the EA, the Mol, and social insurance institutions ensures integrated oversight of residence, employment, and social insurance for foreign workers.

At the operational level in **Serbia**, the establishment of **a one-stop-shop system for processing applications for D Type visas and single permits** constitutes a formal coordination mechanism embedded directly in legislation. This system enables structured information exchange between the Ministry of Interior (Mol), the National Employment Service (NES), and other relevant bodies during the decision-making process, as well as subsequent cooperation in cases involving identified risks

45 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

46 Ministry of Internal Affairs, National Strategy on Migration 2021–2025 and Action Plan 2021–2023 (Pristina, 2020), 12–15, <https://mpb.rks-gov.net/Uploads/Documents/Pdf/EN/364/Strategija%202020-2025%20,%20ANG.pdf>

or irregularities. Coordination also occurs through harmonisation of administrative practices within ministries and among their decentralised units.

4.1.3 Operational-Level Coordination: Data and Data Exchange Systems

While some of the examples cited above refer to operational-level cooperation through data exchange between relevant institutions, this subsection examines this issue in greater detail. In recent years, several Western Balkan partners have implemented significant reforms to improve data exchange among designated institutions.

	Data systems
Albania	National Electronic Registry for Foreigners (NERF)
Bosnia and Herzegovina	Information System for Migration
Kosovo*	Visa Information System DCAM database
Montenegro	Several institutional databases
North Macedonia	Integrated Database
Serbia	Unified digitalised procedure

Table 2: Existing data systems

One of the most significant institutional developments in **Albania's migration management system has been the establishment of the National Electronic Registry for Foreigners (NERF)**, where governmental authorities are mandated to enter and update personal data of foreign nationals⁴⁷. NERF contains separate modules for visas, border crossing controls, irregular stay, and identification documents, as well as a residence and work permit module, which contains data input which is verified by the Border and Migration Directorate and the National Agency of Employment and Skills. Its functionality is closely linked to border procedures, with the Border and Migration Police authorised to use automated verification systems that collect identification data. NERF also interacts with the **Moi Total Information Management System**, an integrated system for handling border control and migration data such as entry/exit records, travel documents, vehicle movements, and the registration of foreign and the National Civil Registry, ensuring integration with broader state databases.

In **Bosnia and Herzegovina, the central database on foreigners is part of the Information System for Migration**, which is maintained in **electronic form and contains data from official records** kept on the basis of the Law on Foreigners and the Asylum Law. The Employment Service of Republika Srpska, with the mandate to regulate the employment of foreign nationals in the entity, maintains data on all foreign workers who have been granted permits and regularly informs the relevant institutions, thereby ensuring transparent management of labour migration in Republika Srpska.

47 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

48 According to Decision of the Council of Ministers (DCM) No. 857 of 29.12.2021, On the Establishment and Operation of the National Electronic Registry for Foreigners in the Republic of Albania, and in line with Law on Foreigners.

In **Kosovo***, the management of migration, residence, and labour permits relies on a foundational set of digital systems administered primarily by the MIA. The core system is the **Visa Information System**, which is fundamental to visa processing across diplomatic missions and border crossings. The **DCAM database** serves as the centralised repository for foreigners' personal data, electronically registering all temporary and permanent residence permit applications. The electronic system used for residence permits is linked to the electronic visa system⁵⁰.

In **Montenegro**, labour migration-related data is maintained across **several institutional databases**. The Ministry of Interior (Moi) manages records on issued temporary residence and work permits and submits monthly reports to the Employment Agency Montenegro (EAM) to monitor the use of annual quotas. The Ministry of Foreign Affairs (MFA) maintains data on issued, denied, and revoked visas, while the Police keep records on registration, deregistration, and changes of residence of foreign nationals staying based on the long-stay (D) visas. The Labour Inspectorate is developing an internal information system, which has been gradually expanded to support reporting and enforcement needs, including the recording of foreign workers' nationalities. The Inspectorate is currently connected to the Tax Administration's database, allowing inspectors to access employer-level data, such as the number of registered employees, which represents a significant improvement in inspection capacity. Furthermore, a limited number of staff within the Employment Service have limited access to Tax Administration data to verify employer compliance, specifically whether employers have outstanding debts to the state⁵¹.

In **North Macedonia**, the **Moi operates the Integrated Database**, a centralised repository for critical data on asylum, migration, and visas. This information system is designed to facilitate the comprehensive processing and utilisation of data across various competent authorities. The scope of information managed within this database covers procedures for the issuance and extension of work permits, as well as records related to temporary and permanent residency, citizenship, border entry and exit, and visa. The visa application process is facilitated by the **National Visa Information System (N-VIS)**, a centralised digital infrastructure. Functioning as a comprehensive electronic database, the N-VIS is specifically engineered for the secure receipt, exchange, and processing of applicant data.

In **Serbia**, the introduction of the unified digitalised procedure conducted at the One-Stop-Shop⁵² represents a key structural reform. Both the long-stay (D Type) visa procedure and the unified single residence and work permit issuance procedure involve the same level of screening, including the assessment of residence and employment-related conditions, and security checks. In both procedures, the Moi assesses residence conditions, while employment-related requirements are examined by the NES, with security clearances provided by the Security Information Agency.

In addition to the above-mentioned databases, with varying degrees of interoperability and digitalisation, it is worth noting **that various institutions are mandated to produce migration data**. The respective Western Balkans statistical offices provide essential, although at times indirect, data related to labour migration. Key publications of statistical offices provide relevant disaggregated statistics on the broader demographic and labour market context. This is the case of the Institute

49 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

50 Interview KOS_1.

51 Interview MNE_03.

52 Validation Workshop, Vienna, November 2025.

of Statistics in Albania⁵³, the Kosovo* Agency of Statistics (KAS), the State Statistical Office of North Macedonia or the Statistical Office of the Republic of Serbia. Also, relevant annual or periodic report are published by line ministries and respective agencies, such as the Migration Profiles published by the Ministry of Internal Affairs (MIA)⁵⁵ of Kosovo*, the annual reports on the implementation of the Strategy on Migration and Reintegration of Returnees by the Ministry of Interior of Montenegro, the Employment Agency and the Labour Inspectorate in North Macedonia or the National Employment Service in Serbia. The most consolidated overview of labour migration trends in Serbia is provided through the Annual Migration Profile⁵⁶ published by the Commissariat for Refugees and Migration (SCRM).

In sum, in all WB partners, relevant institutions produce data on migration more generally and data on labour migration in particular. This is increasingly facilitated by a shift towards centralised digital databases, such as Albania's NERF and Serbia's unified digitalised procedure, to consolidate visa, residence, and work permit records. These reforms improve inter-institutional data exchange, allowing ministries, employment agencies, and in some cases tax authorities to share information for permit verification and quota monitoring. However, significant challenges remain regarding the full interoperability of systems and the inconsistent disaggregation of data across different institutions. In addition to these developments, national statistical offices and line ministries complement these operational systems by providing secondary data through migration profiles and labour market reports. The following sub-section presents the main gaps and limitations in the institutional framework, as identified by the relevant stakeholders interviewed.

4.2 Recurring Limitations and Gaps in the Institutional Framework

The consulted stakeholders across the Western Balkans have highlighted three main categories of limitations in the institutional framework:

Categories of limitations in the institutional framework		
Operational-level cooperation and oversight	Multitude of relevant data producers	Functionality of databases

Table 3: Limitations in the institutional framework

The first category refers to limitations from the perspective of **operational-level cooperation and oversight**, such as the absence of a permanent inter-ministerial coordination at expert-level (Kosovo*) or overlapping mandates and limited communication between involved ministries and agencies (BiH, North Macedonia).

53 The Institute of Statistics in Albania, for instance, publishes the annual report "Foreigners in Albania", presenting data on foreigners with residence permits and irregular migrants, including numbers, countries of origin, and reasons for residence, with employment being the main motive.

54 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

55 Ministry of Internal Affairs. Publications. <https://mpb.rks-gov.net/f/40/Publications#>.

56 The Migration Profile is a document adopted annually by the Government of the Republic of Serbia, upon the proposal of the Commissariat for Refugees and Migration of the Republic of Serbia, and it contains the most comprehensive set of statistical indicators in the field of migration. In the "immigration" section, the profile includes secondary data provided by the relevant ministries and institutions.

The second category of limitations refers to a **multitude of relevant data producers** which, linked with limited cooperation and lack of coordination, among other factors, determine 1) a fragmented picture regarding labour migration (Montenegro, North Macedonia); 2) gaps in the systematic monitoring and collection of data related to actual labour market needs (Serbia) or 3) statistical distortions due to the data collection practices (Montenegro). Consequently, these limitations can lead to inaccurate analyses and an incomplete understanding of what has been called the real market needs, which in turn result in quotas set through administrative processes rather than empirical analysis. However, in some instances, stakeholders underlined that even with limited numbers approved (within quotas), they often remain unused due to slow procedures. As a result, in BiH, for instance, employers in sectors such as hospitality and construction frequently miss the seasonal hiring window because of delays.

Finally, the third category refers to the **limitations of the functionality of databases**, even where such digitalised databases exist. Here, stakeholders have underlined: 1) the absence of an integrated pathway that traces foreign workers from the initial visa or work permit application through the actual employment (Albania, BiH, North Macedonia); 2) the lack or limited interoperability across key governmental databases (BiH, Kosovo*, North Macedonia); 3) manual processing of documents (Kosovo* North Macedonia); 4) the access to and timeliness of official statistics is significantly impeded by institutions publishing outdated data and further complicated by technical difficulties encountered when attempting to download the relevant documents (Kosovo*).

ABSENCE OF INTEGRATED PATHWAY Albania, BiH, North Macedonia	LACK OF INTEROPERABILITY BiH, Kosovo*, North Macedonia
MANUAL PROCESSING OF DOCUMENTS Kosovo* North Macedonia	LIMITED ACCESS & OUTDATED STATISTICS Kosovo*

Table 4: Limitations of Database Functionality in Managing Foreign Workers

57 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

→ 5. Legal Framework

The Western Balkans have undertaken significant legal reforms in recent years to align their migration frameworks with European Union standards, though progress remains uneven across the region. Albania has revised its legal framework to align with EU standards⁵⁸. These reforms reflect broader regional efforts to harmonize migration governance with EU acquis as part of the accession process. For example, according to the latest Report of the Republic of Serbia on the implementation of the Action Plan for Chapter 24 (January–June 2025), activities related to Interim Benchmark 2—alignment with the EU acquis in the area of legal migration—have been formally completed through amendments to the Law on Foreigners and the Law on the Employment of Foreigners. It is worth noting that legislative developments will be assessed by the European Union in practice, and whether additional closing benchmarks would be introduced to address remaining gaps, particularly in the area of labour migration governance and implementation⁵⁹. From the perspective of the EU accession of Montenegro for instance, labour migration-related issues are addressed in a fragmented manner across several negotiation chapters, most notably Chapter 2 (Freedom of Movement for Workers), Chapter 19 (Social Policy and Employment), and Chapter 24 (Justice, Freedom and Security). The Montenegro EU Accession Programme 2024–2027 envisages additional legislative amendments, particularly to align national legislation with the EU acquis on posted workers, sanctions against employers of irregularly staying third-country nationals, family reunification, intra-corporate transfers, and the status of students and researchers.

	Key legislation
Albania	Law on Foreigners (No. 79/2021)
Bosnia and Herzegovina	Law on Foreigners (“Official Gazette of BiH”, No. 88/2015, 34/2021 and 63/2023)
Kosovo*	Law on Foreigners (Law No. 04/L-219)
Montenegro	Decree on the Criteria and Procedure for Determining the Annual Number of Temporary Residence and Work Permits for Foreigners Law on Foreigners
North Macedonia	Law on Employment and Work of Foreigners
Serbia	Law on Foreigners Law on the Employment of Foreigners Nationals

Table 5: Overview of key legislation

58 Source: mup.rs, accessed December 6, 2025, https://www.mup.gov.rs/wps/portal/sr/lut/p/z1/04_Sj9CPyKssy0xPLMnMz0vMAfIjo8zi_S19zQzdDYy83c1cjQwcA80tXbxdLYwtPAz0w_Wj9KOASgxAEcD_YLsbEUAKuQIQAI!!/?1dmy&urile=wcm%3apath%3a/public_cyrillic/baner/baner+sadrzaj/evropske+integracije

59 The European Commission’s Montenegro 2025 Progress Report. It also devotes limited attention to labour migration as such, indicating that this area has not yet been comprehensively assessed. However, it recommends launching consultations on a new labour law, which should include the regulation of foreign seconded workers in line with the EU acquis, and notes that GRETA’s recommendations on investigating labour exploitation and trafficking involving foreign workers remain unaddressed. (European Commission (2024), Serbia 2025 Report. Brussels. 14)

60 *This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

The remainder of this section will highlight key legislation and recent legal developments in each Western Balkan partner and synthesise recurring gaps in the legal frameworks, as identified by the interviewed stakeholders. Moreover, relevant laws for each Western Balkan partner are listed in Annex 3.

In **Albania**, the **Law on Foreigners (No. 79/2021)** constitutes the primary legal instrument governing the conditions under which foreigners may enter, reside, and work in Albania: standard employment but also under distinct categories such as seasonal workers, highly skilled professionals, cross-border employees, mobile digital workers, intra-corporate transferees, specialists or trainees, as well as investors and service contractors. Regarding foreign workers, the **Labour Code (No. 7961/1995)** stipulates that, if certain legal standards are assessed as less favourable than the legislation of the employee's country, the more advantageous foreign legal standards must be applied. For the list of the laws which shape the governance of foreign worker migration in Albania, including complementary legislation, see Annex 3. The key development in the Albanian legislation is the introduction of **the Single Permit system** which has markedly improved administrative efficiency and simplified the overall process.⁶¹ The Single Permit merged the residence and work permits into a single document, streamlining the application process through the online E-Albania and E-Visa platforms and improving operational coordination among responsible bodies.

In **Bosnia and Herzegovina**, in line with the Stabilisation and Association Agreement (Article 70), the Law on Foreigners is harmonised with the EU Acquis and related directives. In general, BiH regulations are applied at the state, entity, and district levels. The coexistence of framework legislation (*lex generalis*) and entity-level employment laws (*lex specialis*) reflects the legal and institutional complexity of BiH's migration system. With regard to the employment of foreigners in BiH, the general regulation that provides the framework for action, basic definitions and competence of institutions is the **Law on Foreigners ("Official Gazette of BiH", No. 88/2015, 34/2021 and 63/2023)**. The different entities also have dedicated laws, namely: Federation of BiH – Law on Employment of Foreigners (No. 111/12), Republic of Srpska – Law on Employment of Foreigners and Stateless Persons (No. 24/09), and the Brčko District – Law on Employment of Foreigners in the Brčko District of BiH (No. 15/09). See Annex 3 for a list of relevant legislation. As mentioned above, The **Federation of Bosnia and Herzegovina recently amended key legislation to introduce a list of deficient occupations** in which employers can hire a foreign worker without a labour market test.⁶² The list of occupations, drawn yearly by the Federal Employment Agency, for the upcoming year, together with the Economic and Social Council and with the approval of the Federal Ministry of Labour and Social Policy, is expected to be based, among others, on concrete market needs.⁶³ This is expected to both keep safeguarding the domestic labour force and speed up the employment process.

In **Kosovo***, the primary legislation regulating the employment of foreigners is the **Law on Foreigners (Law No. 04/L-219)**, which governs the entry, movement, residence, and employment of foreign nationals. This law specifically addresses the employment of foreigners by establishing the framework for issuing of residence and work permits. At the time the fieldwork (for this report) was conducted,

61 Interview ALB_1.

62 Sarajevo Times (2026), Blog. Business. The Federation of BiH introduces easier Employment of Foreigners. <https://sarajevotimes.com/the-federation-of-bih-introduces-easier-employment-of-foreigners/> (22 April 2026)

63 Idem.

64 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

legal reform was discussed, with a **draft law prepared in 2024, but expected to be adopted in 2026 or 2027**⁶⁵. The Law mandates that the Government sets an annual quota for the employment of foreigners, including the possibility of a specific quota for seasonal employment. Pathways are divided into working within this quota or working outside the quota, which typically applies to specialised or strategically important personnel. The **Labour Law (No. 03/L-212)** regulates the rights and obligations arising from the employment relationship for both employees and employers across the public and private sectors.

In **Montenegro**, labour migration governance rests on two key normative pillars: the **Decree on the Criteria and Procedure for Determining the Annual Number of Temporary Residence and Work Permits for Foreigners**⁶⁶ and the **Law on Foreigners**⁶⁷. Together, they define both the quantitative and procedural dimensions of access to the Montenegrin labour market for foreign nationals. Recent developments include **proposed amendments to the Law on Foreigners, which introduce facilitative measures targeting sectors with persistent labour shortages**, notably health care and information technology. In both sectors, the amendments enable foreign nationals to obtain temporary residence and work permits based on employment contracts concluded for a minimum duration of 12 months, while removing the previously envisaged high minimum income thresholds. At the same time, the draft amendments further regulate the position of posted workers, aligning the national framework with Directive 96/71/EC. They clarify key elements such as the assignment of workers through foreign temporary employment agencies, the scope of rights, declaration obligations, and the designation of a person responsible for documentation, while allowing permits for posted workers outside the annual quota system. In parallel, the amendments address risks of misuse of residence grounds, particularly in cases involving executive directors and company founders. Stricter economic substance requirements are introduced, including an obligation to employ at least three full-time workers (one of whom must be a Montenegrin citizen), alongside a 180-day transitional period and a minimum annual tax liability of EUR 5,000 as a condition for permit renewal. Additional measures include a EUR 200,000 real estate value threshold for residence based on property ownership (excluding EU citizens) and provisions aimed at preventing fictitious accommodation arrangements.

In **North Macedonia**, the **Law on Employment and Work of Foreigners** regulates the employment of foreigners, specifying the conditions and procedures under which they may work in the country. It defines employment as either entering into a contract with a domestic employer or obtaining self-employed status and establishes categories of work-related residence. The law also introduces a quota system, limiting the number of foreign workers to no more than five percent of the legally employed population, with the quota determined annually by the government based on recommendations from the Employment Agency. Complementing these employment-specific mandates, the **Law on Foreigners** regulates the general conditions for the entry, exit, and residence of foreigners in the country. At the time of drafting this report, legislative reform was underway through two dedicated working groups, led by the Ministry of Interior and the Ministry of Economy and Labour, to address the overlapping directives in the two laws mentioned above.

⁶⁵ Interview KOS_6.

⁶⁶ Official Gazette of Montenegro, No. 20/2019.

⁶⁷ Official Gazette of Montenegro, No. 12/2018, 3/2019 and 86/2022.

In **Serbia**, labour migration is governed primarily by the **Law on Foreigners**⁶⁸ and the **Law on the Employment of Foreigners**⁶⁹. Most recent amendments, adopted in August 2023 and in force as of 1 February 2024, introduced a comprehensive reform of Serbia's labour migration system, significantly restructuring admission pathways, administrative procedures, and institutional roles. The reformed framework is supplemented by a number of implementing by-laws, including the **Rulebook on the Approval of Temporary Residence** and the **Rulebook on the Electronic Submission of Visa Applications and the Issuance of Visas** forming a coherent system for managing labour migration pathways. A key reform is the introduction of the unified digitalized procedure conducted at the **One-Stop - Shop**. From the perspective of labour mobility trends in Serbia, it is also relevant to highlight that the latest amendments to the Law on Employment of Foreigners introduced **mechanisms that facilitate increased mobility of foreign workers within the domestic labour market ("consent" mechanism)**.

5.1 Gaps in the Legal Framework

While all Western Balkans have regulated the entry and work of foreigners through primary and secondary legislation, stakeholders interviewed highlighted several recurring limitations. One of the most frequently mentioned gaps in the legal systems concerns to the need of legislation to be updated – either to meet current labour market developments and needs (**BiH, Kosovo***) or to align it with the EU legal framework and practice, or both (**Albania, Serbia, Montenegro**).

Another highlighted gap refers to overlapping or incompletely corresponding stipulations between the main relevant laws. In **North Macedonia**, for instance, stakeholder interviews and subsequent consultations revealed that the labour migration governance legislation does not operate as a coherent whole in practice. Respondents described overlapping mandates between the Law on Foreigners and the Law on Employment and Work of Foreigners, compounded by continued reliance on outdated bylaws and administrative forms. There is a broad consensus that the laws regulating the employment and residence of foreigners need to change, to simplify timelines, and formally introduce digitalisation. Legislative reform is currently underway through two dedicated working groups, led by the Ministry of Interior and the Ministry of Economy and Labour, which aim to address overlapping regulations.

68 "Official Gazette of the RS", No. 24/18, 31/19 and 62/23.

69 "Official Gazette of the RS", No. 128/14, 113/17, 50/18, 31/19 and 62/23.

70 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

➔ 6. Labour Migration Governance: Recruitment, Entry, and Oversight



6.1 Recruitment

The Western Balkans is transforming from a region of emigration to a destination for international labour. While regional neighbours historically filled workforce gaps, there is a pronounced demographic shift toward recruiting from distant nations, specifically India, Bangladesh, Nepal, and the Philippines. The private employment intermediaries play a critical role in mediating this influx. The recruitment process itself relies on a complex mix of licensed private employment intermediaries and informal unlicensed intermediaries. While licensed recruitment intermediaries must undergo a formal licensing process and are subject to oversight to ensure they adhere to legal standards, many workers are reached through unlicensed “brokers” who operate entirely outside of formal oversight and regulations. This informal landscape facilitates the avoidance of accountability mechanisms and puts workers at greater risk, such as the charging of illegal recruitment fees and the confiscation of travel documents.

6.1.1 The Role and Regulation of Private Employment Intermediaries

Private employment intermediaries are increasingly important actors in labour market recruitment. They play a key role in connecting employers with job seekers, improving labour market responsiveness, and complementing public employment services. These intermediaries often play a central role in international labour migration.

The ILO Private Employment Agencies Convention, 1997 No. 181, (ILO 181 Convention) sets the modern international standard for regulating these employment intermediaries. Most WB partners have ratified this convention⁷¹, which creates a framework for the registration, licensing, and effective regulation of these intermediaries while ensuring the protection of the workers who use their services. It applies to all categories of workers and every branch of economic activity, with the sole exception of seafaring.

71 https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11300:0::NO:11300:P11300_INSTRUMENT_ID:312326:NO

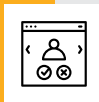
The ILO 181 Convention defines private employment agencies as independent natural or legal persons that provide specific labour market services. These services primarily include matching offers and employment applications where the agency does not become a party to the resulting employment relationship. The definition also encompasses agencies that employ workers with a view to making them available to a third-party “user enterprise” which assigns and supervises their tasks. Additionally, the convention includes agencies providing job-search services like career guidance, labour market information, or consulting. By covering these distinct categories, the convention provides a comprehensive framework for employment intermediaries while as a general principle, strictly prohibiting the charging of fees or costs to workers.

A. Functional Roles and Mandates

Across the WBs, private employment intermediaries are known by various of names that reflect their specific functions and local legal frameworks. While some designate these entities as non-public employment service providers, others maintain a clear distinction between employment agencies, which focus on job-matching and mediation, and temporary work agencies. More broadly, these recruitment intermediaries are also commonly referred to throughout the region as private employment agencies (PEAs).

The mandate of these PEAs is to operate as a non-public actor in the recruitment and mediation of both domestic and/or foreign workers. While the PEAs across the WBs differ in the specific functions they perform, the core roles of these agencies generally fall into four distinct areas:

JOB INTERMEDIATION AND MATCHING:



This is the primary mandate for most PEAs across the WBs. It can include facilitating contact between job seekers and potential employers, acting on behalf of employers to select qualified candidates and handling the process between job offers and applications in cases where the recruitment intermediaries are not a formal party to the eventual employment relationship.

RECRUITMENT AND ADVISORY SERVICES:



Recruitment intermediaries mandated to provide professional assessments and guidance, including verifying applicant qualifications and candidate backgrounds, and specialised consulting to both employers and job seekers regarding the recruitment process.

TEMPORARY WORK MODELS:



Recruitment intermediaries function as temporary work agencies where the intermediary acts as the formal employer by hiring workers directly to assign them to third-party companies. While the recruitment intermediary remains the legal employer, the third-party company is responsible for defining and supervising the worker's daily tasks.

INTERNATIONAL MEDIATION:



This includes mediating employment for local citizens seeking to work in foreign countries and recruiting foreign workers to meet local labour needs, such as seasonal hiring or the placement of foreign staff into local branches of international companies.

B. Licensing

Across the WBs partners, licensing PEAs follows a structured process. While specific details vary by partner, several requirements and procedures are common to most.

Licensing Requirements

In all six WBs partners, PEAs must obtain a formal license from the relevant Ministry (typically Labour or Economy) to operate legally. The licensing process is prescribed by law and serves as a mandatory first step to make sure PEAs meet legal standards.

The licensing process generally involves verifying an agency's legal status, staff qualifications, and/or physical infrastructure. Operationally, this requires PEAs to be established as formal legal entities and registered within national business or trade registers, such as the Serbian Business Registers Agency or the National Business Centre in Albania. Regarding staff qualifications, certain requirements ensure that agencies are managed by professionals. **In Serbia, for example, the law requires that at least one employee or the legal representative holds a university degree and passes a specific professional exam.** Integrity and background checks are also key components, as licensing authorities typically assess the founder or legal representative for criminal records or a history of previous licence revocations. **In Albania, for instance, agencies must provide evidence of a clean criminal record and at least five years of service in the labour market.** Finally, there are specific restrictions to ensure operational integrity, such as **in Montenegro, where temporary work agencies are prohibited from engaging in any activities outside of their licence** and must explicitly include their status in their business name.

Financial Safeguards and Fees

A common regulatory standard across the region's legal frameworks is the prohibition against charging mediation fees to job seekers. Additionally, to protect workers, some legal frameworks across the WB partners require financial safeguards as a condition for licensing. For example, **in North Macedonia, agencies must maintain a bank guarantee that remains valid throughout the licence period and for three months after it expires,** serving as a reserve to cover unpaid salaries and benefits if an employer defaults.

Duration, Renewal, and Transparency

A commonality across the region is that licences are granted for fixed durations, requiring formal applications for renewal. The duration of the licence varies across the region, generally ranging from an initial one-year period to a maximum of five years before a renewal is required. For example, **in Kosovo*, the initial permit lasts for one year with extensions up to three years,** while **North Macedonia uses a stepped approach of two-year licences before granting a five-year permit.** In **Serbia, licences are granted for a full five-year term from the start.**

The renewal of licences is a formal process designed to confirm that an agency still meets the specific requirements set by the law. This process is often contingent upon mandatory inspections by the

72 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Labour Inspectorate to verify that the agency maintains its operational and technical standards. **In Albania and North Macedonia, the Inspectorate is legally mandated to conduct systematic pre-liscence and periodic inspections.** In Serbia, the renewal process involves a substantive assessment to ensure the agency continues to meet all legal requirements.

Transparency is maintained through electronic PEAs registries, which allow the public to verify the legal status of these agencies. Most WB partners manage these through publicly accessible online registers administered by their respective Ministries of Labour and/or Economy. While the frequency of updates varies among WB partners, these online registers typically provide current data on the number of active temporary work and employment agencies operating within each WB partner. For example, in **Albania, the National Business Centre maintains a central electronic register of all licensed PEAs.** This public database is kept accurate through a multi-agency approach: institutions must update their own entries, including courts that are required to report legal changes within five days. To ensure data is reliable, the employment agency links this registry to tax records, allowing for instant verification of an agency's legal and active status.

6.2. Entry and Work Authorisation

Legal pathways for the entry and employment of foreign nationals across the Western Balkan region are primarily structured around the purpose of employment as the main ground for admission and stay. In this context, the procedure for obtaining temporary residence for employment purposes represents the central and most common pathway through which foreign labour is regulated, particularly in cases involving longer-term employment (usually employment of one year or more, in some economies shorter for seasonal employment). At the same time, most systems also provide simplified regimes applicable to short-term work, allowing certain categories of foreign nationals to engage in employment without undergoing the full residence and work authorisation procedure. For example, **Kosovo* provides for short-term work permits enabling employment for up to 90 days,** while **Montenegro allows specific categories of foreigners to work based on a certificate of work registration for up to 90 days within a year, without obtaining a temporary residence and work permit.** It should also be noted that access to the labour market is not exclusively tied to employment-based residence pathways. In practice, certain categories of foreign nationals are granted direct or facilitated access to the labour market based on another legal ground for stay. However, the specific categories vary across systems. These may include, for example, persons admitted based on family reunification, international protection, autonomous residence status or permanent residence.

Pre-entry phase

The visa for long-term stay (typically D visa) generally serves as a preliminary legal basis for entry. However, its legal effect in terms of access to the labour market varies across systems. In some cases, it may enable conditional access to work (for example **in Serbia foreigners with a D visa issued for employment purposes are permitted to work for the duration of the visa's validity,** that is in duration from 90 to 180 days), while in others it does not confer any right to employment, which remains strictly tied to a prior or separately issued work authorisation (for example **in BiH a foreigner cannot start working on the basis of a work permit, and issued visa before he or she has been granted temporary residence**). Procedural sequencing also differs. While in most systems the process begins with the issuance of a visa for entry, in some cases, such as BiH, it is preceded by the issuance

of a work permit, followed by the visa and subsequently the approval of temporary residence for employment purposes. In other systems, these steps are more integrated or overlap procedurally, and the timing of applications—particularly whether they are submitted prior to entry through diplomatic or consular missions or initiated after entry—varies across jurisdictions. For example, in the case of **Montenegro, applications for temporary residence and work permits for seasonal employment may also be submitted through Montenegrin diplomatic or consular missions in the country of origin.**

In addition, the scope and depth of verification carried out prior to entry differ significantly across systems. In some cases, such as **Serbia, a comprehensive assessment is conducted already at the pre-entry stage, including residence-related, employment-related, and security conditions**, with multiple institutions involved in parallel. By contrast, in other systems, such as Montenegro, the pre-entry phase is more limited in scope and primarily focused on general residence-related requirements and the formal demonstration of the purpose of stay, while employment-related conditions are not subject to substantive assessment at this stage.

Post-entry phase

Following the entry, foreign nationals are required to initiate the procedure for obtaining temporary residence for employment purposes. Across most economies in the region, there has been a shift towards integrating residence and work authorisation into a single procedure, often referred to as a “single permit” system. This model enables the parallel or coordinated assessment of residence-related and employment-related conditions within one administrative process, in some cases supported by digitalised systems. This approach aims to streamline procedures, reduce administrative burdens, and improve coordination between institutions. In contrast, BiH maintains a dual system, where the work permit and temporary residence permit are issued through separate, sequential procedures. This creates practical challenges, including misalignment in permit durations and the need for employers to renew work permits while residence permits valid. Employers’ associations in BiH have highlighted the absence of a unified administrative interface and advocate for the introduction of a **“one-stop shop” system**, similar to the model already operational in **Serbia, where a single administrative point facilitates coordination among multiple authorities.**

Institutional arrangements for decision-making vary across the region, particularly in terms of whether the assessment of conditions is centralised within a single authority or distributed among multiple institutions. Different governance models can be identified. In some systems, responsibility is centralised within one institution, as in **Montenegro, where the Ministry of Interior assesses both residence- and employment-related conditions within a single procedure.** In other systems, responsibilities are divided across multiple institutions through sequential procedures, as in **BiH, where the process unfolds in distinct but interconnected stages involving work authorisation, entry, and residence.** These stages are carried out by different authorities and within separate procedures, which may create coordination challenges in practice.

A third model is based on a consolidated administrative framework in which multiple institutions participate within a single procedure, assessing different sets of conditions in parallel. This approach is illustrated in **Serbia, where responsibilities are distributed in accordance with institutional mandates:** residence-related conditions are assessed by the Ministry of Interior, security checks by the Security Information Agency, and employment-related conditions by the National Employment Service. Similarly, in **Albania, the National Agency for Employment and Skills initially assesses**

employment-related conditions based on electronically submitted documentation, after which the State Police conducts final verification, including the review of original documents.

The assessment of applications generally encompasses three broad categories of conditions: **residence-related requirements, employment-related conditions, and security checks**. The scope and type of these conditions are not uniform and may vary depending on the envisaged form of employment, as well as across jurisdictions. Residence-related conditions typically include proof of accommodation (that is, the existence of a genuine residential address), sufficient means of subsistence, valid health insurance, and the absence of entry bans or security risks. Security checks are often conducted through consultation with national security bodies. Employment-related conditions focus on verifying the existence of a genuine employment relationship and may vary depending on the type of engagement, such as standard employment, seasonal work, self-employment, or posted work. This includes, inter alia, the assessment of the employer's legal status, the authenticity of the job offer, the qualifications of the foreign worker, as well as, where applicable, labour market test.

Labour market test

A key regulatory mechanism within this framework is the labour market test, which serves as a tool for assessing the potential impact of employing a foreign national on the domestic labour market. **With the exception of Montenegro, where the labour market test has been abolished and replaced by a quota-based system, it is in place across the region, although its scope and implementation vary significantly.** In general terms, the test aims to verify whether a vacancy can be filled by available domestic or otherwise preferential labour before granting approval for foreign employment.

However, systems differ in how they operationalise this objective. In some cases, such as **Serbia, the labour market test is conducted through an administrative check against the jobseeker registry**, with the competent authority assessing whether there are registered candidates who meet the requirements specified by the employer for the given position (similarly is the case in **North Macedonia**). This may also include certain additional safeguards, such as verifying whether the employer has recently dismissed workers for economic or organisational reasons and is attempting to fill the same or similar positions with foreign labour. In other systems, such as **Albania, the labour market test is implemented through a formalised procedure that requires the vacancy to be publicly advertised for a defined period**. During this time, the employment service actively identifies and proposes candidates who meet the position requirements, following a legally defined order in which different categories of candidates are considered. This typically includes, first, domestic jobseekers, followed by other categories of candidates who are granted preferential access to the labour market under national legislation, such as certain groups of foreign nationals. Notably, in the case of Albania, these preferential categories explicitly include citizens of Western Balkan economies, thereby broadening the notion of “available labour” within the labour market test.

In addition, in some systems, the labour market test is applied across different forms of employment, including seasonal and high-skilled work, indicating a consistent policy orientation towards protecting domestic labour supply irrespective of the type of engagement. For example, **in BiH, seasonal vacancies must be made available to domestic jobseekers through the public employment system for a defined period before foreign workers can be engaged**. A similar approach applies to the employment of highly qualified workers, where prior publication of the vacancy and the absence of suitable domestic candidates constitute a prerequisite for authorisation. These differences reflect distinct approaches to labour market protection, ranging from registry-based verification to more dynamic intermediation and prioritisation mechanisms.

Employer credibility and compliance history

In addition to labour market considerations, **all systems include the verification of the employer's legal existence, typically through checks of business registration and operational status.** However, beyond this baseline requirement, regulatory approaches diverge in the extent to which the employer's broader compliance record is formally incorporated into the decision-making process. In some systems, compliance with tax and/or social security obligations, as well as adherence to labour regulations, constitutes an explicit legal condition for the approval of employment authorisation. Non-compliance directly results in the refusal of the application, as is the case **in Albania, where such requirements apply across different forms of employment and are expressly prescribed as grounds for rejection.** By contrast, in other systems these requirements are more narrowly framed. For example, **in Montenegro, employer non-compliance with tax and labour obligations is explicitly prescribed as a ground for refusal** primarily in the context of seasonal employment, while similar considerations may also arise at later stages, including as a basis for terminating an already granted permit.

It should be noted that, in practice, elements related to the employer's credibility may also be taken into account through the use of administrative records and data held by other public authorities, such as tax, court or registration databases, depending on the institutional setup. However, where such elements are not formally prescribed as conditions, their consideration does not necessarily affect the outcome of the procedure. These differences therefore reflect variations in how such safeguards are embedded in the regulatory framework.

Employment-related documentation

Employment-related documentation, in the form of an employment contract, draft contract, or job offer, is required across all systems as part of the authorisation process, although not uniformly across all forms of employment. The scope of this requirement varies depending on the type of engagement. For example, **in some systems it applies primarily to standard employment relationships (e.g. Serbia, Montenegro), while in others it extends to additional categories such as seasonal work (Montenegro, BiH) or employment through temporary work agencies (Serbia).** At the same time, the stage at which a formal employment contract is concluded also differs, as in certain systems it is finalised only after the approval of residence.

The elements of these documents are defined by labour legislation, which prescribes mandatory components of the employment relationship, such as job description, remuneration, and working time. Accordingly, their assessment within the authorisation procedure primarily consists of verifying whether the proposed terms of employment comply with applicable labour law standards. In some systems, this link is explicitly reflected in migration legislation. For example, **in Albania, approval is granted only where it is established that foreign workers are not recruited under less favourable conditions than domestic workers in comparable positions,** and that the proposed terms of employment comply with national labour law.

Differences in the documentation required at the application stage—whether a concluded employment contract, a draft contract, or a job offer—do not in themselves indicate a more or less robust regulatory approach. Regardless of the form, these instruments are grounded in labour law and contain defined elements intended to reflect the employer's obligation and the terms of the intended employment relationship. As such, their primary function in the authorisation procedure is to demonstrate a genuine intention to employ the foreign national. At the same time, the terms

reflected in these documents are not necessarily fixed and may be subject to change following the issuance of the permit.

However, this flexibility does not extend to the core characteristics of the authorised employment. Across WBs, particular emphasis is placed on maintaining the specific job or activities for which the foreign national has been authorised. Changes that alter the nature of the position may undermine the basis on which the permit was granted, including the outcome of the labour market test, and may therefore have implications for the validity of the permit.

6.3 Employment Oversight

6.3.1 Labour Inspection - Mandate and Powers

Employment oversight across the Western Balkan region is primarily carried out by labour inspectorates, which are established in all economies as the central authorities responsible for monitoring compliance with labour legislation. **Their mandate generally covers the enforcement of employment relations, working conditions, as well as occupational safety and health standards, including legislation governing the employment of foreign workers.** While core mandates are broadly comparable, reflecting international standards such as ILO Convention No. 81, the scope of supervision may extend beyond labour relations to include related regulatory areas, depending on the national framework. For example, **in Serbia, the labour inspectorate is mandated to oversee compliance not only with labour and employment legislation, but also with a wide range of related laws** (such as those governing occupational safety and health, on simplified work engagement, agency employment, volunteering, and workplace-related public health requirements, including smoking restrictions in closed workspaces, etc.), as well as collective agreements, internal employer acts, and employment contracts.

Labour inspectors are typically granted broad powers, including access to workplaces, the ability to review certain documentation (including, inter alia, work contract), verify employment status and social security registration, and order corrective measures. In line with international standards, inspections may be carried out without prior notice. In some systems, the labour inspectorate is empowered to conduct inspections not only of registered employers, but also of unregistered entities, enabling it to address some aspects of informal economic activity and undeclared work (such as in Serbia). This expands oversight beyond formally registered employers and enables intervention in cases of undeclared work or illegal business operations.

Common violations in employer compliance

Available inspection findings indicate several types of irregularities in the employment of foreign workers, although the scope and level of detail vary across systems.

One of the **most frequently identified** issues concerns the **legal status of employment**, particularly the engagement of foreign nationals without valid residence and work permits. In practice, this often concerns foreign nationals who have entered the country on a long-stay (D) visa but have not obtained the required residence permit for employment. This represents one of the most common types of irregularity identified in inspection practice (such as in Serbia and Montenegro). **In Serbia,**

this includes cases of foreign nationals employed by foreign employers and posted to perform work for entities registered in Serbia without having obtained the required permit. In Montenegro, foreign nationals are also found working without valid permits or in employment arrangements that do not correspond to the conditions under which the permit was issued.

At the same time, inspection practice points to specific enforcement challenges linked to administrative procedures. In Montenegro, for example, delays in issuing residence and work permits may result in situations in which foreign nationals begin working while their applications are still pending, even where the foreign national and the employer have complied with all procedural requirements. In such cases, labour inspectors are legally required to treat any work performed without a valid permit as illegal, creating a structural tension between administrative processing timelines and enforcement obligations.

A **second group of violations** concerns **breaches of labour relations**. The most common issues include the absence of written employment contracts and/or failure to register workers for mandatory social insurance. In addition, inspection findings point to a broader range of non-compliance related to working conditions, including failures to keep employment contracts at the workplace, non-compliance with rules on working time, overtime and rest periods, as well as irregularities in wage calculation, payment practices, and payroll record-keeping (such as in Serbia). In some systems, stakeholder findings further point to situations involving wage-related violations, excessive working hours, and other forms of labour exploitation, although these are not always reflected in formal complaints or official inspection data (such as **in North Macedonia, where a gap has been observed between reported instances of exploitation and formal institutional records**).

Inspection practice also identifies **irregularities related to occupational safety and health**, particularly in sectors characterised by higher risks.

Sanctions against employers

Sanctioning frameworks across the region can be broadly understood through two complementary categories of measures: (i) corrective measures imposed directly by labour inspectorates within the scope of inspection supervision, and (ii) the initiation of misdemeanour or, where applicable, criminal proceedings.

First, labour inspectorates are generally empowered to impose a range of corrective measures to ensure compliance with labour and migration regulations. These measures typically have an immediate remedial function and may include orders to eliminate identified irregularities, such as requiring employers to conclude employment contracts, register workers for mandatory social insurance, or obtain the necessary work authorisations. However, available findings suggest that the practical effects of such measures may be limited in certain contexts. For example, **in Serbia, foreign nationals found working without authorisation do not always regularise their employment following inspection measures; instead, they may be returned to their country of origin**, while employers subsequently engage other foreign workers under similar conditions. In addition, **inspectorates may impose operational measures, such as temporary suspension of work or prohibition of certain activities, particularly in cases involving serious risks to worker safety or significant breaches of legal obligations (such as in North Macedonia and Kosovo*)**. In some WB partners, these corrective

73 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

powers extend to more stringent enforcement actions. For example, in **North Macedonia, where an undeclared worker is identified, the Labour Inspectorate may order the employer to establish a formal employment relationship and complete social insurance registration within a prescribed deadline.** Repeated violations may lead to temporary bans on business operations, including mandatory closure of premises. Similarly, in **Kosovo*, labour inspectors may impose urgent measures such as a partial or complete suspension of work or a prohibition of activities in cases of serious violations,** directly affecting the employer's operational capacity.

Second, beyond these corrective measures, labour inspectorates may initiate misdemeanour proceedings against employers for violations of applicable legislation, typically resulting in financial penalties. These proceedings represent the primary formal sanctioning mechanism across WBs. In certain cases, where violations reach a higher threshold of severity—such as serious breaches of labour rights, exploitation, or endangerment of worker safety—cases may be referred to competent judicial authorities for criminal prosecution, in accordance with national legislation. In some systems, sanctioning frameworks also include additional layers of liability. For example, in **Albania, a system of graduated sanctions applies, ranging from warnings and corrective orders to substantial financial penalties for serious or repeated violations.** In addition, employers may incur civil liability for damages to workers, particularly in cases involving unlawful termination or occupational injuries, while criminal liability may arise when violations meet the thresholds established by criminal law.

Sanctions affecting foreign workers

While employment oversight primarily targets employer compliance, the identification of irregularities in practice may also result in proceedings against foreign workers. In particular, where a foreign national is found working without a valid residence and work permit, or engaged in undeclared employment (such as without a written contract or registration for mandatory social insurance), labour inspectors initiate misdemeanour proceedings not only against the employer, but also against the worker, in accordance with applicable legislation. In such cases, sanctions imposed by competent courts most commonly take the form of financial penalties.

These consequences should be distinguished from measures affecting the foreign national's residence status. Situations where a foreign national is found working for an employer other than the one indicated in the permit, or performing activities outside the authorised scope of employment, are generally treated as unlawful employment, as residence and work authorisation is typically granted in relation to a specific employer and the type of work to be performed. Such circumstances may constitute grounds for the refusal, revocation, or termination of residence and work authorisation by the competent authorities. At the same time, these patterns do not necessarily reflect intentional non-compliance by the workers concerned. It remains unclear to what extent foreign nationals are aware that their employers have not secured the required work permits or have failed to regularise their employment, particularly in systems where employers, alongside foreign nationals, are authorised to initiate procedures for the approval of entry and employment (for example Serbia).

Available evidence also indicates that enforcement practice may not be uniform in all cases. In certain contexts, a degree of flexibility has been observed, particularly where employers subsequently take steps to regulate the employment relationship. For example, in Serbia, certain instances from case law suggest that, where employers subsequently registered foreign workers and submitted the required application for a unified permit after the initiation of misdemeanour proceedings, sanctions for the initial period of undeclared work have not been imposed.

Complementary oversight in the employment of foreign workers

Oversight of the employment of foreign workers extends beyond the mandate of labour inspectorates and relies on the complementary roles of multiple institutions involved in (labour) market regulation, migration management, and business oversight. While labour inspectorates remain central actors in monitoring employer compliance, the effective exercise of their mandate depends on access to information and to inputs generated by other authorities whose competencies are not primarily supervisory but are essential for assessing the legality of employment of foreign nationals. These include, inter alia, institutions responsible for social security registration, which maintain records on employment status; business registries, which provide information on legal entities; tax authorities, which monitor compliance with fiscal obligations; and authorities responsible for residence and migration control. In addition, institutions involved in assessing or authorising the employment of foreign workers play a key role in determining whether the conditions for lawful employment are met (and remain in place), particularly in relation to the purpose of stay and the existence of a genuine employment relationship.

From the perspective of labour inspection, the ability to verify key elements of lawful employment—such as the validity of work authorisation, the scope of permitted activities, the identity of the employer, and compliance with labour law requirements—is closely linked to the availability and accessibility of data held by these institutions. The absence or fragmentation of such information may limit the capacity to effectively detect irregular employment, including situations where foreign workers are engaged without valid permits, employed under conditions that do not correspond to the authorised scope of work, or involved in undeclared work arrangements.

In this context, oversight functions across institutions should be understood as complementary. Effective information exchange and coordination can enhance the identification of non-compliant employers, support the detection of irregular practices, and contribute to a more accurate assessment of whether irregularities reflect intentional non-compliance or more complex arrangements, including potential abuse or exploitation. In this regard, the cooperation is particularly relevant in cases where identified irregularities may require further legal qualification. Coordination with prosecutorial authorities may be necessary to assess whether the nature and severity of violations give rise to misdemeanour or criminal liability, including where elements of labour exploitation or indicators relevant to trafficking in human beings may be present. **In several systems, strategic frameworks addressing trafficking in human beings have provided a platform for strengthening such cooperation (for example in the case of Serbia and Montenegro).** Within these frameworks, joint inspections—particularly those involving labour inspectors and police authorities—have been identified by stakeholders as effective mechanisms for detecting irregularities in the employment of foreign workers and for the early identification of potential cases of exploitation.

Additionally, available findings suggest that inter-institutional cooperation in practice may remain uneven. Mechanisms for data exchange are often limited in scope, access to relevant databases may be restricted, and coordination may take place on an ad hoc basis. In this regard, stakeholders have highlighted the need to further strengthen both strategic and operational cooperation, including through improved interoperability of databases, more systematic information exchange, and the establishment of operational coordination mechanisms to support monitoring of developments in practice.

Permit activation and monitoring of employment commencement

An important aspect of employment oversight concerns whether foreign nationals holding residence and work authorisations actually commence employment with the authorised employer. Several indicators may be considered relevant for assessing whether employment has effectively commenced, such as the start date indicated in employment documentation, the registration of residence address or registration for mandatory social insurance. However, none of these elements can, in isolation, be considered a reliable indicator of “activation” of the permit. In practice, employment contracts may be amended after permits are issued, particularly in systems where only draft contracts or job offers are submitted during the application stage.

Across systems, approaches to monitoring permit activation vary. Some legislations do not explicitly regulate the notion of “activation” of residence and work permits, while others impose obligations on employers to notify competent authorities of the commencement or termination of employment. However, even where such obligations exist, their effectiveness depends on the existence of systematic monitoring mechanisms. In practice, without structured oversight, compliance with notification requirements may depend on employer initiative and is often verified only through *ad hoc* inspections. For example, **in Albania, employers are legally required to notify authorities if employment is not activated or is terminated shortly after entry.** In practice, however, the absence of a consolidated registry and fragmented data across institutions limits the ability to monitor compliance and identify patterns of non-compliance. Similarly, **in Montenegro, although notification obligations exist, the lack of systematic monitoring reduces their practical effectiveness.** In contrast, **North Macedonia has introduced a more structured mechanism through a mandatory system for registering the commencement and termination of work performed by foreign nationals.** This system provides for the timely notification of both the start and termination of employment, as well as the exchange of data between competent institutions, thereby creating an institutional basis for monitoring employment status throughout the duration of the permit. However, the effectiveness of such systems ultimately depends on consistent implementation, data exchange, and enforcement.

These gaps may lead to the situations in which foreign workers do not take up employment, leave shortly after arrival, or engage in work outside the authorised framework. This not only undermines the regulatory objective of ensuring that residence is used for its intended purpose, but may also result in irregular stay, as residence authorisation is granted specifically for the performance of the approved employment. From the perspective of bona fide employers, this also has direct economic implications, as recruitment processes—often involving high administrative and financial costs—may not result in actual employment, creating uncertainty and financial losses.

6.3.2 Institutional Mechanisms for PEA Compliance and Reporting

PEAs oversight is primarily a shared responsibility between the Ministry that issues the license, and the Labour Inspectorate, which oversees legal compliance and working conditions. This oversight is commonly structured through a combination of mandatory reporting obligations and periodic inspections.

Mandatory reporting obligations serve as a primary tool for collecting systematic data and verifying the active status of PEAs. **In Montenegro, agencies are legally required to submit statistical data to the Ministry, temporary work agencies report annually, while recruitment agencies do so semi-**

annually. Similarly, in **Kosovo***, private intermediaries are required to submit annual reports on their mediation and recruitment activities to the Employment Agency. Failure to comply with this obligation initiates a follow-up process that may ultimately result in the line Ministry revoking the licence. Unlike these partners, in **Serbia**, there is no general legal obligation for licensed agencies to regularly report their activities to the Ministry, except in limited cases such as mediation for employment abroad or notification of specific changes to business operations.

Periodic inspections, typically led by the Labour Inspectorate, provide a more direct method of oversight by physically assessing an agency's facilities and records to ensure operational compliance. In many WB partners, these inspections are mandatory: for instance, **Albania introduced systematic pre-approval inspections that apply to every PEA seeking a licence**. In **North Macedonia**, the Labour Inspectorate is legally mandated to conduct pre-licence and periodic inspections to verify compliance before the respective Ministry issues or renews any authorisation. In **Serbia**, while the Inspectorate is explicitly assigned oversight for temporary work agencies, these inspections are predominantly administrative and procedural, focusing heavily on verifying prescribed spatial and technical requirements at the licensing or renewal stage.

6.4 Limitations in Employment Oversight

Labour inspection – Institutional capacity and operational challenges

The functioning of labour inspection systems depends on institutional capacity, organisation, and the availability of data for planning and targeting inspections. In this regard, available evidence points to system-specific challenges rather than uniform patterns across the region. However, the need to further strengthen inspection capacities is evident across WB partners, with differences in the areas where such support is most needed.

For example, in **Kosovo***, the Labour Inspectorate faces structural and operational limitations, including an outdated legal framework, the absence of standardised methods for collecting and analysing inspection data, and limited capacity for risk-based planning and targeted inspections. Despite a relatively high volume of inspections, these constraints affect the ability to effectively identify non-compliance. In **Montenegro**, a recurring systemic constraint in monitoring concerns the limited interoperability of IT systems used by inspection services. Inspectors currently have access to basic information on registered employees within a specific company; however, this level of access is insufficient for comprehensive risk analysis. Similarly, in **BiH**, the labour inspectorate's limited institutional capacity is frequently identified as a key constraint on its ability to effectively monitor working conditions.

In some systems, available findings and stakeholder inputs indicate that additional operational challenges arise from the availability and quality of information needed for effective inspection planning. Inspection oversight is often concentrated in high-risk sectors, such as construction and hospitality. However, before on-site inspections, inspectors may lack comprehensive information on the actual employer, the legal entity operating at a given location, or the structure of business

74 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

activities. In practice, the identity of the employer and the nature of the business are frequently established only during field inspections, which limits the possibility of advance risk profiling and targeted supervision. Further challenges relate to the organisation of work and the territorial scope of inspection. In practice, employers may be registered in one location while work is carried out across multiple sites, and foreign workers are often not present at the employer's registered seat at the time of inspection, as work is performed in the field. This complicates the exercise of supervisory powers and sets certain limitations.

Practical constraints affecting inspection effectiveness also include language barriers during on-site controls and limited direct access to migration-related databases necessary for timely verification of the legal status of foreign workers. In some contexts, recurring patterns of non-compliance are not systematically tracked through existing oversight mechanisms, which may result in the same employers reappearing in procedures for the approval of applications despite a history of violations.

Additional findings highlight system-specific limitations identified in particular contexts. In **North Macedonia, limitations relate to both legal and operational aspects**, including restricted authority to access private households where foreign workers are employed, staffing shortages and limited access to integrated institutional data, which affects the ability to identify employers engaging foreign nationals. In **Kosovo***, **challenges are also observed in relation to institutional capacity, including difficulties in recruiting specialised staff and limitations in the scope of oversight**, as the Labour Inspectorate's mandate does not extend to monitoring recruitment practices before to the establishment of an employment relationship.

Limited Mandate

Migrant workers in the private household sector, particularly women from countries like the Philippines employed in home care, face acute vulnerability due to the sector's lack of regulation and institutional oversight. Labour Inspectorates often lack the legal mandate to enter private residences or monitor private contracts within homes. This can foster an environment susceptible to rights violations. Consequently, these workers can become heavily dependent on their employers and remain largely hidden from official protection mechanisms. For example, in Kosovo*, the home care and babysitting sector is considered a "black hole" for oversight because labour inspectors cannot access it to verify working conditions.

Challenges in the PEAs Monitoring

The ILO Convention No. 181 mandates that each legal system determine the status of PEAs through a licensing or certification system and a clear institutional framework for oversight. Under this Convention, oversight is primarily the responsibility of labour inspection services or other competent authorities, which must provide the machinery and procedures needed to investigate complaints, abuses, and fraudulent practices. While WB partners have generally adopted these formal frameworks, PEAs oversight in the region is frequently undermined by institutional fragmentation, a narrow focus on administrative compliance and a gap in regulating unlicensed intermediaries who operate outside formal legal frameworks.

Across the WBs, regulatory oversight of PEAs prioritises formal administrative compliance over a

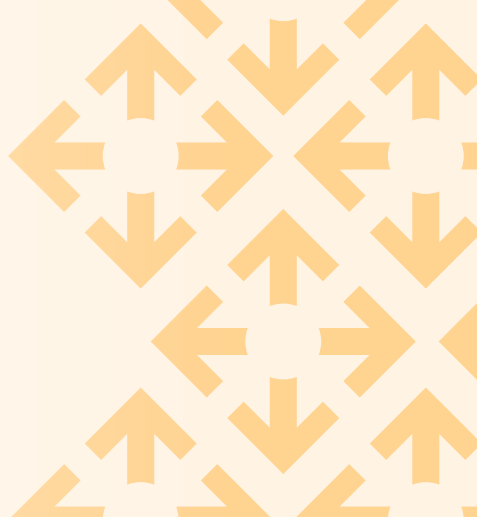
75 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

substantive evaluation of ethical recruitment standards, fairness, and transparency. This procedural approach is a shared challenge across the region, where oversight often focuses heavily on verifying prescribed requirements, rather than assessing actual recruitment practices or the treatment of workers. One example from the region is Serbia, where the inspection system is predominantly procedural, focusing on compliance with the prescribed spatial and technical requirements during the licensing stage. Furthermore, legislative loopholes in Serbia allow the PEA founder to circumvent regulatory restrictions by re-establishing businesses under the names of different founders who formally meet legal requirements, even if the original operator has a history of non-compliance or license revocation. In addition, while individuals convicted of certain labour-related, corruption, or embezzlement offences are barred from agency ownership, this prohibition only applies if they were sentenced to an unconditional prison term of at least six months. In practice, individuals receiving conditional sentences for these crimes are still legally permitted to act as founders or representatives, severely limiting the preventive effect of background checks.

Another challenge in some of the WB partners, is **reliance on recruitment agencies based in neighbouring countries, leading to limited transparency and weakened domestic oversight. In BiH, many recruitment processes are conducted through these external intermediaries**; this has been directly linked to the exploitation of foreign workers, specifically regarding poor housing conditions and excessive working hours. This issue is mirrored **in Serbia, where agencies registered abroad participate in recruitment but can fall outside the domestic legal framework**, enabling them to circumvent statutory requirements and accountability mechanisms for rights violations.

Furthermore, the existing mandatory reporting mechanism is predominantly procedural rather than substantive. Although PEAs are required to submit reports, this process remains a formalised procedure rather than a meaningful oversight tool. PEAs are generally required to report to the Ministry or a designated Employment Agency. The frequency of these reporting obligations varies, for example, **Montenegro applies a system in which temporary work agencies report annually**, while recruitment agencies report semi-annually. **In Kosovo***, reporting relies almost entirely on data reported by the agencies themselves, and the Employment Agency has a limited mandate to act if these reports are incomplete.

76 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



➔ 7. Protection of Migrant Workers

Legal frameworks across the WBs are designed to ensure that migrant workers enjoy the same level of protection and human rights as domestic citizens, specifically mandating that they are not employed under less favourable conditions than nationals in equivalent positions. The WB partners provide migrant workers with equal access to labour legislation, social insurance, and judicial grievance mechanisms to safeguard their rights and ensure fair treatment within the workforce.

7.1 Zero-Cost Principle

The Zero-Cost Principle dictates that workers should not be charged any fees for recruitment or mediation services, ensuring that the financial burden of hiring remains with the employer. The Zero-Cost Principle, a cornerstone of ILO standards and guidance, strictly prohibits PEAs from charging workers any recruitment fees or related costs. However, across the Western Balkans, this principle is described by stakeholders as difficult to monitor due to the absence of structured mechanisms to systematically detect illegal charges.

Throughout the region, for example, **in Montenegro, North Macedonia, and Kosovo*, the protection of workers from recruitment costs is regulated through a strict legal prohibition against charging mediation or recruitment fees to jobseekers.** Despite these protections, the principle is bypassed; **in North Macedonia, for instance, some recruitment agencies place workers in exploitative conditions by deducting up to 30 per cent of their wages to cover travel and administrative expenses.** This practice can lead to debt bondage, making it financially difficult for workers to leave their positions or change employers.

This Zero-Cost Principle is also integrated directly into the licensing framework, for example in **Albania, Kosovo *, North Macedonia, and Serbia, where compliance with this principle serves as a mandatory condition for agencies** to obtain and maintain legal authorisation to operate.

To ensure this principle is upheld, regulatory oversight is primarily led by the Labour Inspectorates, which monitors agency activities and investigates potential rights violations. The legal consequences for breaching this principle are severe, typically involving the suspension or mandatory revocation of an operating license, as the regulatory systems do not provide for gradual or intermediate sanctions for such violations. For instance, in 2022, the Albanian Labour Inspectorate conducted a comprehensive monitoring of 89 private employment agencies. The inspections revealed that 14 percent of the agencies checked were illegally charging workers fees, leading to fines and the

referral of five agencies for license revocation.⁷⁷ Additionally, some WB partners incorporate financial safeguards, such as requiring agencies to maintain bank guarantees that serve as a protective reserve for workers' wages and benefits in the event of an employer's default.

7.2 Rights Violations

Systemic rights violations across the Western Balkans are increasingly driven by coercive practices, the rise of unregulated intermediaries, and the use of fictitious employment structures. The illegal retention of passports by employers is a common and coercive form of rights violation. In Albania, this practice is framed as "insurance" to ensure workers remain until their contracts expire, thereby restricting their freedom of movement and creating a state of dependency. Similarly, in North Macedonia, employers and unlicensed recruitment agencies withhold travel documents until recruitment, travel, and housing costs are reimbursed.

At the same time, formal legal protections are undermined by the growing role of unlicensed intermediaries who have emerged to fill the gap left by formal systems, often ill-equipped to manage inbound migration. These informal actors operate in a regulatory vacuum, mediating between employers and foreign workers to handle digital applications and logistics. Because they operate without governmental oversight, the recruitment process remains opaque, hiding how workers are identified and creating further opportunities for exploitation. Beyond these intermediaries, migrant workers are exposed to fictitious employment schemes where inactive or "shell" companies are used solely to secure residence rights. **In Serbia, for example, institutional screening and territorial checks have identified cases of entities that do not conduct any actual business activity**, lack physical premises, and fail to provide the promised accommodation for workers. Additionally, **Montenegrin authorities have identified fictitious accommodation arrangements**, in which lease agreements are registered solely to satisfy residence application requirements and are terminated immediately after the permit is issued.

Finally, the employers' failure to register foreign staff for mandatory social insurance leaves workers without access to essential healthcare and other statutory social protections. Inspections in Serbia, for example, have identified cases of foreign workers employed without formal contracts or social insurance registration, with Turkish nationals accounting for a significant share of those identified.

⁷⁷ Council of Europe /GRETA. Evaluation Report: Albania. (France. Council of Europe, 2025). <https://rm.coe.int/greta-evaluation-report-on-the-implementation-of-the-council-of-europe/1680b65f41>

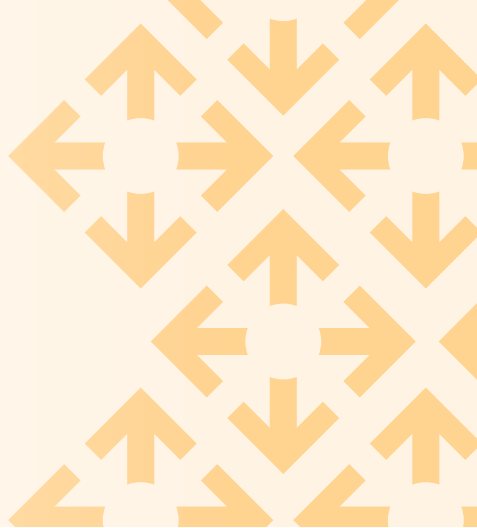
7.3 Grievance Mechanisms: Accessibility and Barriers to Redress

Data across the WB region shows that while law enforcement, judicial, and administrative mechanisms are legally available to both local and foreign workers, practical access remains significantly constrained. This section examines the administrative mechanisms through the Labour Inspectorate's complaint and reporting mechanisms, which serve as the primary institutional channel for protecting migrant workers' rights across the WBs.

The Labour Inspectorate serves as the primary regional authority across all WB partners, mandated to enforce labour standards and protect the rights of both domestic and foreign workforces. To facilitate reporting, the region has established a variety of channels, including formal written submissions, oral statements made directly to inspectors during on-site interventions, and electronic portals or email addresses. Some WB partners have expanded these traditional methods by using social media platforms (such as Facebook and Instagram) and dedicated hotlines to reach a broader audience.

While reporting channels are formally available to some extent, their linguistic and informational barriers severely hinder their practical accessibility. Although institutional websites are often available in English, other administrative tools, such as anonymous complaint links, digital grievance templates, or instructional forms, remain in local languages, limiting their accessibility. For example, in **Albania, rights guides have been published in seven languages** (Arabic, Bengali, English, Filipino, Turkish, Hindi, and Albanian), however these measures have not yet resolved the deeper barriers regarding the specific roles of different institutions and the difficulty of seeking redress. Beyond the linguistic obstacles, there is a lack of clear guidance on how to navigate the local institutional landscape to seek redress, which could lead to confusion over institutional roles. Migrant workers might be unaware of the Labour Inspectorate's existence and may often recognise only the police as a legitimate authority for grievances.

A fear of retaliation is also a barrier to reporting. Migrant workers might avoid filing reports because they feel that a conflict with an employer could result in cancellation of their residence permit or deportation. Given that work permits are tied to a specific employer, workers perceive that filing a complaint will result in the cancellation of their legal residence.



➔ 8. Frameworks for Collaborative Labour Migration Management

This section provides a short overview of labour migration collaboration frameworks employed by the WBs. Considering the region's emergence as a labour migration destination for workers from countries such as India, the Philippines, Bangladesh, and China, this section distinguishes between regional cooperation frameworks – which refer to WBs collaborating in the area of labour migration – and modes of engagement with more distant countries of origin.

8.1 Regional Partnerships

One of the most relevant at the regional level is **the Open Balkan Initiative (OBI) – a regional partnership among Albania, North Macedonia and Serbia** – which allows workers to obtain permits for stay and employment of up to two years, without fees. However, implementation in Albania has largely relied on the Single Permit provisions, limiting the impact of the initiative on migration flows; moreover, the influx of workers under this framework remains modest, suggesting that regional mobility agreements have had limited practical effect to date⁷⁸. While facilitating free access to labour markets for regional nationals, OBI does not introduce mechanisms relevant to third-country nationals.

At the regional level, **Albania, North Macedonia, and Montenegro signed a cooperation agreement to combat informality in the labour market**⁷⁹. In addition, **Albania and Kosovo* signed an MoU between their respective Labour Inspectorates**, establishing joint or coordinated inspections, information exchange through clear inter-institutional protocols, awareness-raising initiatives for employers and employees, and capacity building for labour inspectors⁸¹. Broader bilateral cooperation between the two parties has also included agreements on border security and the free movement of goods and people, with simplified procedures allowing citizens to cross borders without passports or IDs during specific periods of the year. Another relevant cooperation is the **bilateral agreement on temporary employment between Serbia and BiH**. It should be noted, however, that across the Western Balkan partners, there is typically no single centralised repository for all such agreements.

78 CD Institute. Free Movement of Workers: Albania. (Tirana: Cooperation and Development Institute, 2025). Accessed October 10, 2025. https://cdinstitute.eu/wp-content/uploads/2025/04/Free-movement-of-workers_Albania.pdf.

79 Albania, North Macedonia and Montenegro join forces against informality <https://inspektoriati.punes.gov.al/shqiperia-maqedonia-e-veriut-dhe-mali-i-zi-bashkojne-forcat-kunder-informalitetit/>.

80 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

81 Albania and Kosovo sign a joint commitment to strengthen regional cooperation <https://inspektoriati.punes.gov.al/shqiperia-dhe-kosova-nenshkruajne-nje-angazhim-te-perbashket-per-forcimin-e-bashkepunimit-rajonale-fushen-e-inspektimit-te-punes-dhe-mbrojtjes-se-te-drejtave-te-punetoreve/>.

Regional partnerships				
	Open Balkan Initiative	Cooperation agreement to combat informality in the labour market	MoU between Labour Inspectorates	Temporary employment
Countries involved	Albania, North Macedonia and Serbia	Albania, North Macedonia, and Montenegro	Albania and Kosovo*	Serbia and BiH

Table 6: Overview of existing regional partnership agreements

Consequently, this may not represent an exhaustive overview of every contract within the region, as certain documents may not be available online or may not have been disclosed during stakeholder interviews.

8.2 Engagement with Countries of Origin

Cooperation frameworks on labour mobility can range from formal agreements (such as legally binding accords) to non-binding instruments (such as Memoranda of Understanding – MoUs) to projects. Below, we provide examples of such frameworks⁸³ which specifically address either labour mobility or skills migration, with a focus on countries of origin from South Asia. In 2022, for instance, **Albania and Bangladesh signed an MoU** to formalise labour mobility, streamline the recruitment of Bangladeshi workers, and facilitate student enrolment in Albanian universities. The agreement is designed to meet labour demand in Albania while providing employment opportunities for Bangladeshi nationals. It also includes provisions for mutual support in international forums and aims to simplify visa procedures. Stakeholders interviewed in Albania informed that Albania is pursuing agreements with other countries, with negotiations either ongoing (for an agreement with Indonesia) or pending approval by the Ministry of Foreign Affairs (for an agreement with the Philippines).

While Kosovo* currently does not have any formal bilateral agreements or MoUs with emerging countries of origin for the WBs, specifically regarding work mobility or labour migration, it is worth noting that **negotiations on a social security agreement with Türkiye have been concluded**. While the technical negotiations are finalised, at the time of drafting this report, the agreement was awaiting formal signature by the government and subsequent ratification by the Assembly.

Similarly, Montenegro and North Macedonia did not conclude any bilateral labour agreements with countries of origin outside the WB region. Moreover, stakeholders interviewed in Montenegro highlighted that the existing quota system, combined with labour migration pathways regulated under the Law on Foreigners, is considered adequate to meet employers' demand, and bilateral labour

⁸² * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

⁸³ The section is not exhaustive but provides examples of cooperation frameworks between WBs and third countries.

agreements are not seen as necessary. Should the market needs change, a higher demand for labour force could be addressed through adjustments to annual quotas. However, it is worth noting that **in 2024**, Montenegro started **discussions with some third countries of main origin of migrants** coming to Montenegro (**Bangladesh, Pakistan, and Nepal**) to draft labour mobility agreements, which could include a return component⁸⁴. Regarding **Serbia**, the recent engagement **with Uzbekistan through the Memorandum of Cooperation on Labour Migration** from October 2025 represents an initial step toward cooperation with a third country of origin, but the framework agreement lacks operational mechanisms to date.

An analysis of Skills Migration Partnerships (SMP) in the Western Balkans⁸⁵ indicates that, from this perspective, the WBs primarily functions as a region of origin. SMPs are bilateral or multilateral partnerships aimed at creating mutually beneficial outcomes by linking skills development with mobility, allowing migrants to enhance or acquire professional skills⁸⁶. However, all WB partners participate in frameworks that support mobility in both directions, acting as an origin and a destination. Drawing on the broad definitions of SMPs (according to IOM⁸⁷ and the OECD⁸⁸), ICMPD's mapping of SMPs took a broad approach to analysing partnerships at the intersection of skilling and mobility. This mapping includes SMPs that:

- (1) engage government bodies on both sides (at any level);
- (2) combine practical skills development with mobility for some or all participants;
- (3) include a Western Balkans partner; and
- (4) were launched or in operation between January 2015 and December 2025⁸⁹.

Based on these criteria, 14 SMPs were identified in the Western Balkan region. In 4 out of these 14 SMPs the purpose is reciprocal – mobility is designed to go both directions (See Annex 4 on SMPs identified in the Western Balkans). Notable is the **Cooperation Protocol to enhance labour mobility between Egypt and BiH**, signed in 2025, where Egypt acts solely as a country of origin. The Protocol focuses on enhancing labour mobility, skills exchange, and workforce development.

84 According to the EU Progress Report 2025, Montenegro should ensure that any legal pathways developed for third-country nationals are designed in a way that prevents irregular secondary movements towards the EU.

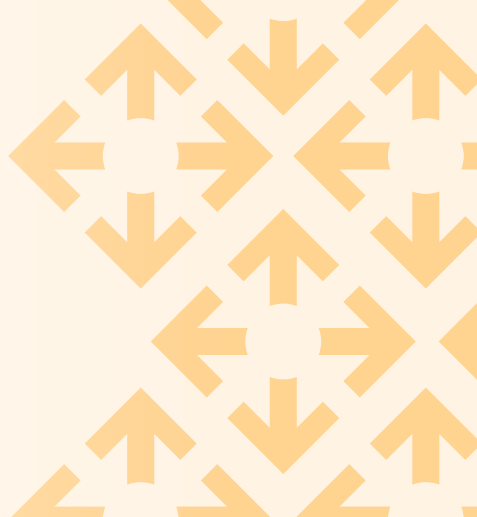
85 This analysis was conducted in the context of the research undertaken in the Horizon project Link4Skills. The analysis refers to a mapping of SMPs which covers government-to-government partnerships (at any level) involving at least one Western Balkan partner that combine practical skills development with mobility opportunities.

86 Hohwieler, L., Katsiaficas C. & Hendow, M. (2026). Skills mobility partnerships in the Western Balkans.

87 International Organization for Migration (n.d.), Skills mobility partnerships: Towards a global approach to skills development and labour mobility, <https://roasiapacific.iom.int/sites/g/files/tmzbdl671/files/documents/skills-mobility-partnerships.pdf>.

88 OECD (2024), Engaging with Employers in Skills Mobility Partnerships, policy paper no. 2024/01, Paris: OECD Publishing, <https://doi.org/10.1787/9e6da0ff-en>.

89 Hohwieler, L., Katsiaficas C. & Hendow, M. (2026). Skills mobility partnerships in the Western Balkans.



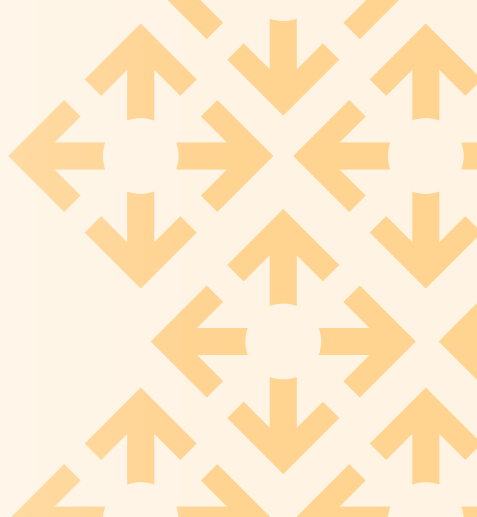
→ 9. Risk of Secondary Movement

Research conducted in the WBs within the PSIMM project did not identify statistical indicators that would allow for a reliable assessment of the existence or the scale of secondary irregular migration of the foreign labour force in the WBs towards the EU. However, there are some indications that at least some cases of secondary movements are plausible. In **Serbia**, for instance, such indications may include refusals of D visa and single permits, particularly when linked to forged documents and cases where employers report that applications were submitted in their name without their knowledge. According to information from the Border Police, entry refusals at Belgrade Nikola Tesla Airport have at times involved **the detection of forged personal documents, including passports, identity cards, visas, entry stamps**, or the use of travel documents belonging to other persons. These cases reportedly most often involve nationals of India, Pakistan, Bangladesh, Türkiye, Iran, China, Morocco, and Cameroon, who are believed to attempt to transit Serbia towards EU Member States using falsified documentation.⁹⁰

In Albania, evidence of irregular onward migration to the EU remains anecdotal. Interviewees noted that **Albania may be used as a “bridge” country**, with isolated cases of workers terminating contracts without explanation and disappearing from the system. This onward movement is difficult to monitor due to the lack of a comprehensive tracking system, leaving employers responsible for reporting missing workers. Similarly, **several interviewees in BiH reported frequent cases of “no-shows,”** where recruited workers fail to arrive after their visas are issued, as well as early departures within weeks of employment. This volatility creates significant business uncertainty, especially in labour-intensive sectors such as construction, manufacturing, and hospitality. Particularly in BiH, officials noted that weak monitoring and non-interoperable data, make it difficult to track the real status of foreign workers, whether they remain employed, move to another employer, or exit the country. In the absence of interoperable databases linking employment services, tax authorities, and the Service for Foreigners, the state cannot effectively monitor retention or detect patterns of onward movement. **In Kosovo*, early contract termination is highlighted** by interviewee accounts of reports they receive from employers, citing instances where **workers, such as those from Bangladesh, sign contracts but unilaterally terminate agreements after only three months.**

90 Pink.rs, “What Are ‘Fantasy Passports’? Mladen Mijatović Explains How Border Police Detect Forged Identity Documents and Who Most Often Uses Them,” Pink.rs, accessed December 21, 2025, <https://pink.rs/drustvo/736125/evo-sta-su-fantazi-pasosi-mladen-mijatovic-otkriva-kako-pripadnici-granicne-policije-prepoznaju-falsifikovana-licna-dokumenta-i-ko-najcesce-sa-njim> .

91 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.



➔ 10. Towards the Roadmap

Thus far, this report has provided an overview of labour migration governance across all Western Balkan partners, with a particular focus on institutional and legal frameworks, the recruitment and entry of foreign workers, employment oversight, migrant workers' protection, and international labour mobility partnerships. By examining the entire chain of foreign recruitment in the Western Balkans – from recruitment to contract expiration – the overall aim of the PSIMM project is to strengthen the capacity of Western Balkan partners to manage and retain a foreign workforce in key sectors, while safeguarding domestic workers.

To this end, the *Roadmap to Prevent Secondary Irregular Migratory Movements in the Western Balkans* was developed through a collaborative approach. This process enabled key stakeholders to first validate the findings of in-depth research, as captured in this report, and subsequently contribute to the roadmap by identifying priority areas for intervention and feasible measures and approaches within different legal and policy contexts. The Roadmap identifies policy measures across six main thematic areas, which are briefly presented below.

1. Evidence-based labour migration policy design

The research revealed that Western Balkan partners face a common structural challenge: labour migration policies are largely reactive, responding primarily to immediate employer demand rather than being informed by anticipatory planning. Labour market data across the region remains fragmented, dispersed among multiple institutions, or difficult to access, which limits governments' ability to accurately assess sectoral shortages or project future labour needs. A key gap across the region is the absence of integrated data systems capable of linking permit issuance, employment activation, social insurance registration and labour market outcomes into a single, policy-relevant information base.

As a result, targeted measures to strengthen the legal basis and governance arrangements for relevant data production and information sharing among institutions are expected to enhance both institutional oversight and labour migration planning. The Roadmap identifies the following partner-level measures as particularly relevant in this area:

- Strengthen the legal basis and governance frameworks for data sharing and labour migration planning cycles, including data related to labour demand, permits, registrations and mobility trends, with clearly defined roles, authorisations and decision-making points.
- Leverage existing databases and administrative records (such as tax and social insurance data) to improve labour market needs assessment and post-entry monitoring.

- Expand data collection to currently under-tracked categories (including cross-border and seasonal workers, where relevant) and incorporate outbound mobility trends and analysis into labour mobility planning.
- Establish a formal process for conducting sector-specific labour market analyses and for periodically reviewing needs-assessment methodologies across institutions or partners, in order to enhance the quality, consistency and reliability of labour needs data.
- Review existing policy tools (such as quotas and labour market tests) against available evidence, including the use of shortage occupation approaches where appropriate.
- Consider integrating information on employers' eligibility, compliance records and labour needs reporting (or equivalent mechanisms) into planning and targeting processes, to strengthen evidence-based policy and operational decision-making.
- Strengthen demand-side measures addressing identified labour shortages, including skills and qualifications recognition (in coordination with relevant ministries where necessary) and training pathways aligned with priority sectors, while also taking account of unemployment levels.
- Agree on a minimum set of core labour migration planning indicators as key performance indicators (KPIs), and embed these within a regular review process (for example, quarterly or annually), with scope for gradual expansion, including forecasting and sector-specific modules.

2. Oversight of recruitment – intermediaries and employers

Regulatory oversight of private employment agencies and employers exists across all Western Balkan partners; however, it remains largely formal rather than substantive. Although licensing requirements are in place, compliance monitoring tends to focus on administrative obligations rather than on ethical recruitment standards. As a result, the recruitment chain—from the country of origin to the workplace—remains largely opaque.

In response, the Roadmap identifies a set of targeted measures aimed at strengthening institutional oversight, including:

- The introduction of a minimum due diligence checklist for employers and intermediaries, consisting of basic advance checks to verify that they are genuine, compliant and suitable to participate in recruitment processes;
- Peer learning initiatives for labour inspectorates and relevant authorities on recurring patterns of employer non-compliance and abuse within recruitment chains (such as repeated non-activation, contract substitution, non-registration, recruitment fee abuses, document retention or misleading job offers), alongside checks on fee and contract transparency;
- The definition of a common set of reference data points for optional tools that support labour migration system integrity and facilitate the detection of misuse, including lists or registers recording recurring patterns of abuse, fraud, non-compliance or other irregularities;
- Where feasible, the establishment and use of structured registers of employers and recruitment agencies that have been sanctioned or found non-compliant, to inform eligibility screening and risk-based targeting;
- Strengthening the legal and regulatory frameworks governing licensing conditions, eligibility criteria and sanctions;

- Standardising key elements of hiring and recruitment procedures to reduce the risk of misuse;
- Clarifying and strengthening oversight of recruitment mediation channels, including, where feasible, ensuring that applications are submitted through employers or licensed agencies;
- Ensuring compliance with international regulations on the recruitment of seconded and posted workers, as well as with broader supply-chain regulatory requirements;
- Improving the supervision of licensed intermediaries through coordinated oversight mechanisms that go beyond a single institution;
- Reducing reliance on informal recruitment channels and unlicensed mediators by strengthening oversight of recruitment chains and improving early detection of misuse, thereby lowering the risk of abuse and trafficking in human beings;
- Introducing ‘trusted actor’ approaches (such as accredited registries or white lists) for employers or agencies with a strong compliance track record, in order to facilitate and accelerate recruitment procedures, supported by clear criteria, safeguards and review mechanisms;
- Strengthening cooperation with authorities in countries of origin, including pre-screening or verification measures where feasible;
- Considering targeted outreach and compliance communication on labour migration pathways to reduce reliance on informal channels, alongside the promotion of lawful recruitment routes.

3. Post-entry visibility and follow-up – activation, changes and termination of workers’ contacts

Once a work permit is issued, institutional visibility over a worker’s actual situation typically diminishes across the region. Research points to limited institutional capacity throughout the Western Balkans to verify whether work permits are activated, whether employment has commenced or continues, and whether contracts are terminated earlier than initially envisaged. Risks of exploitation, undeclared work or onward irregular migration to the EU are most pronounced during the post-admission phase, which is currently the least monitored by public authorities. Addressing these challenges requires not only technical interoperability between systems, but also clear legal mandates for follow-up and a coordinated approach to post-entry oversight.

In this area, the Roadmap identifies the following potential measures:

- Advance and clarify the legal and procedural basis for the activation and termination of employment, as well as for notifications of significant changes (such as changes of employer, worksite, address or contract status), including clear rules on who must notify whom, within what timeframe, and the consequences of non-compliance. Where appropriate, introduce clear procedures for confirming activation that are tailored to the domestic institutional set-up;
- Where feasible, introduce clearly regulated and controlled options allowing workers to change employers where contracts fail, while strengthening post-entry traceability across job changes, including the systematic recording and review of underlying reasons;
- Introduce or reinforce a unique foreign worker identifier (ID) as the primary reference point across the labour migration pathway, and link key records (such as permits, employers, worksites, contract status, inspection findings and status changes) to improve traceability and follow-up, using existing data for basic cross-checks where full system integration is not yet possible;

- Where feasible, maintain structured records of identified ‘false’ applications (i.e. applications containing false information or involving non-genuine employment arrangements) to support traceability, screening integrity and follow-up;
- Strengthen coordination mechanisms between labour inspectorates and decision-making authorities for post-entry follow-up, including structured information flows from inspection findings to permit and residence authorities, and expanded inspectorate access to relevant databases where lawful and feasible;
- Use thematic and risk-based inspections to improve detection of permit non-activation, substitution and early contract termination patterns, and ensure that employer and agency compliance signals can be effectively used for follow-up and targeting (for example, repeated non-activation or early termination patterns feeding into inspections and risk-informed monitoring). Where recruitment intermediaries remain involved after entry, clearly define their role and accountability for key notifications and handover processes (including employment activation, changes or contract termination), as well as mechanisms for remedies where issues arise.

4. Institutional communication and information exchange

Research indicates that the fragmentation of institutional responsibilities is a structural feature of labour migration governance across the Western Balkans. Although multiple institutions are involved, communication and data exchange are often conducted through ad hoc requests, informal contacts and non-standardised formats, notwithstanding some exceptions. This is a cross-cutting issue which, if effectively addressed, has the potential to generate improvements across several other areas of labour migration governance.

To this end, the Roadmap identifies the following targeted measures to strengthen institutional communication and information exchange:

- Map critical points at which responsibility is transferred from one institution or procedure to another, and formalise these handover points where feasible, including by clarifying institutional roles at key stages of the labour migration pathway;
- Establish or reinforce data governance arrangements, including clear rules on who may access which information, for what purposes, and under what accountability mechanisms, in line with applicable legislation;
- Introduce targeted legal, by-law and procedural amendments where necessary to operationalise defined roles, handovers, access rights and reporting obligations;
- Improve the speed and practical functioning of inter-institutional information exchange, including through greater automation, to ensure that key updates can be shared and acted upon without undue delay;
- Establish routine, operational-level communication mechanisms and, where appropriate, introduce two-tier coordination structures (for example, a technical working group alongside a strategic steering body) to link operational challenges with decision-making processes;
- Consider the inclusion of non-traditional partners—such as tax and social insurance authorities, business registries and, where relevant, consular services—within operational coordination frameworks;
- Reduce duplication of administrative procedures by introducing shared checklists and standardised formats where feasible.

5. Improving access to the safeguards for foreign workers and employers

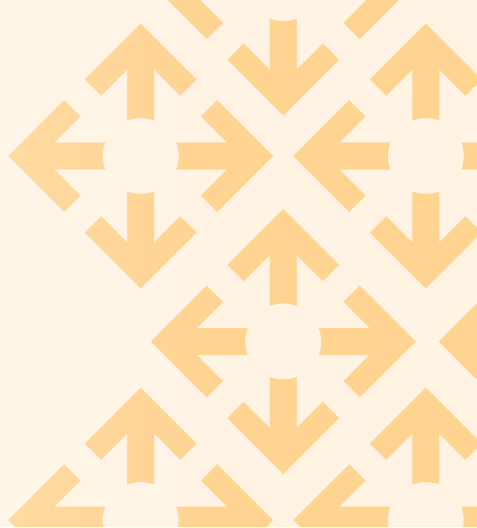
While formal safeguard mechanisms exist across all Western Balkan partners, their practical accessibility for migrant workers remains limited. Language barriers, low awareness of rights, unclear institutional responsibilities and distrust of authorities jointly contribute to systematic under-reporting of potential rights violations throughout the region. To address these challenges, the Roadmap identifies the following targeted measures:

- Upon arrival, provide foreign workers, in relevant languages, with clear and practical information on their rights, obligations and available support mechanisms. Key rules and documents should be made accessible in plain and understandable language, including general conditions for working and residing in the country, occupational safety provisions and contract-related information;
- Establish simple contact-point arrangements and one-stop-shop information services, offering a single access point for information relevant to foreign workers arriving in the region (for example, a designated helpdesk within the employment agency);
- Establish clear complaint and referral pathways, with clearly defined responsibilities for institutions, workers and employers, as well as transparent response timelines and escalation procedures;
- Strengthen the prevention of abuse and under-reporting through clear communication on confidentiality safeguards and non-retaliation guarantees, ensuring that workers are not penalised or treated unfairly for raising concerns in good faith;
- Broaden and diversify complaint channels, where appropriate, to improve accessibility for workers with limited literacy, language skills or disabilities;
- In cases of suspected or confirmed misuse or abuse, link complaint mechanisms with existing social protection, migration and anti-trafficking systems to ensure that affected workers receive appropriate protection and support tailored to their needs;
- Where relevant, provide support services for workers (such as vocational training or language courses) to improve retention and reduce early drop-out;
- Connect foreign worker support mechanisms with broader migrant integration systems, ensuring coherence and effective use of available services;
- Provide clear, sector-specific employer guidance on legal obligations, timelines, lawful recruitment procedures and channels, as well as the consequences of non-compliance;
- Establish dedicated support mechanisms for employers (such as designated contact points or helpdesks) to address procedural questions and reduce inadvertent non-compliance;
- Clarify employers' obligations, including contract transparency, registration procedures and relevant institutional contact points, in order to minimise misunderstandings and promote predictable compliance;
- Where feasible, link employer non-compliance to proportionate follow-up measures (such as warnings, corrective actions and graduated escalation), to enhance predictability, accountability and deterrence.

6. Cooperation with countries of origin

As countries of origin for the migrant labour force to the Western Balkans continue to diversify, cooperation frameworks on labour mobility have become an increasingly relevant area of focus. Although unevenly developed across the region, Western Balkan partners already make use of several cooperation instruments, such as memoranda of understanding (MoUs) and bilateral labour agreements, including with more distant countries of origin such as Bangladesh and Egypt. To further strengthen cooperation with countries of origin, the Roadmap identifies a set of targeted measures, including:

- Develop or strengthen bilateral arrangements (such as labour cooperation agreements, protocols or MoUs) supported by concrete and implementable action plans. Where relevant, ensure that these arrangements address the full labour migration pathway by linking labour migration with return and readmission, as well as cooperation on trafficking in human beings, including labour exploitation;
- Establish working-level verification channels with designated contact points, where feasible, and develop practical routines for verifying key documents and contract terms;
- Improve visibility of origin-country actors involved in recruitment (for example, through lists or directories of agencies or counterpart institutions), where feasible and useful;
- Strengthen selection mechanisms and monitoring of priority corridors, including clearer prioritisation of recruitment channels and communication measures to reduce reliance on informal intermediaries;
- Align pre-departure information provided in countries of origin with worker-facing guidance in destination countries (covering rights, obligations, contract terms and complaint mechanisms), where feasible, to ensure realistic expectations and reduce misinformation;
- Strengthen consular coordination and address capacity constraints in priority corridors with limited coverage through practical resource-sharing arrangements, such as shared consular support models or pooled verification capacities, and ensure clear contact points for verification and case support;
- Expand formal data-sharing agreements with priority countries of origin to support verification processes, case management and broader labour migration cooperation;
- Incorporate operational procedures for joint verification of recruitment agencies, exchange information on fraudulent intermediaries (including blacklists where appropriate), and establish clear frameworks for the assistance, protection and dignified repatriation of identified victims of exploitation and trafficking.



11. Conclusions

This report took stock of the current labour migration management infrastructure in the Western Balkans. It outlined the main governing and implementing institutions — both governmental and private actors — as well as the principal legislation and procedures regulating the employment of foreign workers. It also identified recurring gaps and challenges in migration management throughout the employment cycle, from recruitment and post-entry verification to employment oversight and contract termination. In this respect, the report contributes to existing knowledge on labour migration in the region by focusing on meso-level determinants of mobility, such as migration management regimes and the role of private employment agencies as key intermediaries.

Research findings highlight that the Western Balkans occupies a distinct position in the European labour migration landscape, defined by a dual role: the region functions both as a major source of labour to the European Union and as a rapidly emerging destination for workers from third countries. While nearly 25% of the region's citizens live abroad, domestic economies are experiencing acute labour shortages, necessitating a growing reliance on foreign labour inflows. This duality creates a unique governance context in which shared challenges arise that no single partner can effectively address in isolation. For example, a policy change introduced by one partner — such as a new visa regulation or quota adjustment — can trigger unintended consequences across the wider region.

A persistent feature of labour migration governance in the Western Balkans is the continued emphasis on frameworks designed to protect the domestic workforce, even as that workforce continues to emigrate in large numbers. These pressures are compounded by rapid population decline, with an estimated 40% of employers reporting difficulties in finding the required skills despite record-low unemployment rates. In this high-pressure environment, existing quota-based systems and slow administrative procedures are proving inadequate for meeting the needs of key economic sectors. Such constraints can prevent employers from legally securing the foreign labour required to sustain operations during periods of acute shortage.

Governance is further shaped by a pronounced demographic shift in recruitment patterns, marked by a transition from reliance on neighbouring countries to sourcing labour from more distant regions. Historically, labour shortages were addressed through regional mobility; however, a surge in demand, with work permits more than doubling from approximately 46,000 in 2018 to over 100,000 in 2024, has driven increased recruitment from countries such as India, Bangladesh, Nepal, and the Philippines. This shift has introduced a complex ecosystem of licensed and unlicensed private employment intermediaries, as well as informal brokers, many of whom operate outside effective regulatory oversight. Managing these new migration corridors requires the development of stronger governance structures, including enhanced screening, monitoring, and protection mechanisms for workers who have limited prior ties to the region.

The Western Balkans is also distinguished by a shared commitment to aligning legal and institutional frameworks with European Union standards as part of the accession process. This collective orientation towards the EU acquis — particularly in relation to Chapters 2, 19, and 24, although their relevance to labour migration governance is not perceived uniformly across all partners — requires Western Balkan economies to restructure their labour migration management systems in a coherent manner. Alignment with EU standards on freedom of movement, social policy, and security presents a strategic opportunity to shape modern, efficient, and rights-based labour migration systems across the region.

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Annex 1: **Labour Migration Governance** **Main Institutions**

Annex 1 presents key institutions relevant for labour migration in different WB economies. These are institutions with a direct mandate to manage labour migration. Since there are other institutions, indirectly involved in managing labour migration, the lists presented are not exhaustive.

ALBANIA

Institution/ department	Responsibilities
Ministry of Economy, Culture and Innovation (MECI)	Primary governance and policy responsibilities rest with the MECI, which is designated as the institution overseeing labour migration. MECI ensures the right to vocational education and training, as well as access to decent employment, including opportunities for migration for work purposes. Additionally, MECI is responsible for the licencing of the private employment agencies, which play a significant role as non-public actors in the labour migration system.
National Agency for Employment and Skills (NAES)	Under MECI, is the National Agency for Employment and Skills (NAES) specifically responsible for managing the process of issuing work permits to foreign nationals, providing services related to employment programs, and monitoring labour market. NAES is the cluster of administrative institutions and providers of employment, self-employment, education, and professional training services, which are an integral part of the system of the MECI. NAES local offices have established migration desks to provide services and assistance to both foreign nationals and returning migrants.
State Labour and Social Services Inspectorate (Labour Inspectorate)	is responsible for ensuring compliance with legislation on working conditions and employee protection, including monitoring the hiring process of foreign migrant workers. Labour Inspectorate also inspects private employment agencies. Complementing the licensing process, the Labour Inspectorate conducts periodic checks to monitor compliance with relevant labour law regulations. In 2024, the efforts to improve the PEAs monitoring was reinforced through the revision of the Administrative Instruction regulating PEAs, alongside a Council of Ministers decision on their functioning and licensing. The revised framework strengthened ongoing monitoring of PEAs, improved the Labour Inspectorate's internal registry, and introduced systematic pre-approval inspections, carried out by the Labour Inspectorate, and applied to all agencies seeking a licence

Institution/ department	Responsibilities
Ministry of Interior (Mol)	the leading institution for migration management, operates through its Department for Border and Migration (DBM), which handles applications for residence permits.
Ministry for Europe and Foreign Affairs (MEFA)	is responsible for negotiating relevant international cooperation agreements in the field of migration and for issuing visas through diplomatic and consular channels.
Ministry of Health and Social Protection	designs and implements health and social care policies, ensuring services for resident foreigners and other vulnerable groups. Its agency, the State Social Service, provides essential support to vulnerable groups of people, including migrants.

BOSNIA AND HERZEGOVINA

Institution/department	Responsibilities
Coordination Body for Migration Issues in BiH	By the Decision of the Council of Ministers of Bosnia and Herzegovina from 2013, the Coordination Body for Migration Issues in Bosnia and Herzegovina was appointed. The coordinating body is in charge of continuously reviewing the overall situation in the field of migration and asylum, encouraging and ensuring inter-ministerial cooperation between relevant institutions dealing with migration and asylum, as well as assessing future migration trends and proposing measures to improve migration policies and strategic documents. It also oversees implementation of strategic documents. The Coordination Body is composed of high-ranking officers of the BiH Border Police, the Service for Foreigners, the Immigration Sector, the Asylum Sector and the State Investigation and Protection Agency (SIPA) within the Ministry of Security; the Sector for International Legal and Consular Affairs of the Ministry of Foreign Affairs; Sector for Refugees, Displaced Persons, Readmission and Housing Policy and the Sector for Emigration of the Ministry of Human Rights and Refugees. Technical assistance to the work of the Coordinating Body is provided by the Immigration Sector.

Institution/department	Responsibilities
Ministry of Security of Bosnia and Herzegovina	The Law on Asylum designates the Ministry of Security's Asylum Sector as the first instance authority responsible for deciding on asylum applications. Appeals against these decisions are handled by the Court of BiH. The principle of "non-refoulement" protects refugees from being returned to a country where they would face risks such as the death penalty, torture, or inhumane treatment. As already mentioned above, asylum seekers can be considered irregular migrants until they are approved for refugee status or subsidiary protection. Consequently, if these individuals are denied asylum and do not have the legal right to stay, they fall into irregularity with a voluntary departure deadline established by the immigration and asylum laws of BiH. The asylum procedure focuses on evaluating whether there are valid grounds for granting refugee status based on risks related to race, religion, nationality, political opinion, or membership in a particular social group. Additionally, the principle of "non-refoulement" is also considered when granting subsidiary protection. The Ministry of Security's Asylum Sector can make various decisions on asylum applications, including approval of refugee status or subsidiary protection.
Ministry of Security of Bosnia and Herzegovina, Sector of Immigration	This Sector is in charge of: reception of persons in BiH by the agreements on readmission, foreigners who have voluntarily left BiH.
Ministry of Security of Bosnia and Herzegovina, Border Police of BiH	The Border Police is a law enforcement agency that plays a vital role in ensuring border security and overseeing the movement of individuals into and out of Bosnia and Herzegovina (BiH). Operating at the borders and entry points, the Border Police enforce immigration laws, conducts document inspections, and actively works to prevent "illegal" migration. As an operationally independent body within the Ministry of Security, the BiH Border Police is primarily responsible for monitoring and controlling the country's international borders. Its pivotal role involves screening migrants and refugees upon arrival and identifying potential victims of human trafficking.
Ministry of Security of Bosnia and Herzegovina, Service for Foreigners' Affairs	The Service for Foreigners' Affairs (SFA) is a specialized agency operating under the Ministry of Security in Bosnia and Herzegovina (BiH). It holds a significant role in managing the movement and stay of migrants across the country. As the administrative body within the BiH Ministry of Security, the SFA is responsible for administrative tasks and inspections related to foreigners and asylum seekers. As they are part of the MoS, they work in close coordination with the other sectors of MoS, such as Sector for Asylum.

Institution/department	Responsibilities
Intelligence and Security Agency (OSA)	The Intelligence and Security Agency (OSA) in Bosnia and Herzegovina (BiH) plays a significant role in relation to immigration legislation, particularly concerning the security aspect. It is responsible for conducting security checks on foreigners to assess potential risks to the security of BiH. These checks aim to identify any potential threats or concerns that may arise from the presence of certain individuals in the country. The OSA's role is crucial in ensuring the safety and stability of BiH by assessing the security implications associated with the entry and presence of foreigners, thereby contributing to effective immigration control and safeguarding national security.
State Investigation and Protection Agency (SIPA)	The State Investigation and Protection Agency (SIPA), is an independent agency operating within the Ministry of Security of Bosnia and Herzegovina. It has operational independence in carrying out its duties and was established to fulfil police responsibilities. SIPA plays a crucial role in criminal investigations, counter-terrorism efforts, and combating organized crime. It collaborates with various security and law enforcement agencies, including those involved in addressing immigration-related crimes such as human trafficking and migrant smuggling. SIPA's mandate, as defined by relevant laws, includes the prevention, tracking, and investigation of criminal acts falling under the jurisdiction of the Court of Bosnia and Herzegovina. These acts encompass organized crime, terrorism, war crimes, human trafficking, and other crimes against humanity and values protected by international law.
Ministry of Foreign Affairs	The Ministry of Foreign Affairs has the authority and responsibility for the readmission of Bosnian and Herzegovinian nationals, as established in the Readmission Agreement between BiH and the European Community, as well as in bilateral readmission agreements with other countries. These agreements are implemented through protocols. The ministry, through its diplomatic and consular representations, issues the necessary travel documents for the return of individuals who will be readmitted. If there is insufficient evidence to meet the requirements for readmission, the relevant Bosnian and Herzegovinian diplomatic and consular representations arrange an interview, upon request, with the potential returnee to determine their nationality. The ministry's Division for International Law Relations and Consular Affairs acts as a mediator between the competent institutions involved in implementing the agreements, facilitating discussions on specific details such as the date of return, designated border crossing points, and the need for possible escorts.

Institution/department	Responsibilities
Ministry of Human Rights and Refugees of Bosnia and Herzegovina	Once an asylum seeker receives a positive decision on their claim, they are officially recognized as a refugee or a person granted subsidiary protection. At this point, the Ministry of Human Rights and Refugees (MHRR) assume responsibility for their well-being and support. Refugees and persons granted subsidiary protection have the option of being accommodated either at the Salakovac Refugee Reception Centre, if space is available, or at a registered private address if they can arrange it themselves. According to Article 12 of the Law on the Ministries and Other Bodies of the BiH Government, the MHRR is responsible for providing reception and care for up to 30 days to BiH nationals returning to BiH under readmission agreements. To ensure effective coordination and cooperation between the MHRR and the Ministry of Security, a protocol on cooperation has been signed. This protocol regulates the exchange of information regarding the reception and provision of care to returnees, as well as harmonizes procedures and safety aspects related to the reception and treatment of returnees. The MHRR plays a critical role in providing support and care to refugees, persons granted subsidiary protection, and BiH nationals under readmission agreements, ensuring their well-being and facilitating their integration into the society. After the refugee status or subsidiary protection is granted, the Ministry for Human Rights and Refugees assumes responsibility for safeguarding the rights and addressing the concerns of refugees and individuals with subsidiary protection in BiH. The MoS collaborates with several independent bodies to effectively carry out its duties in this regard.
Ministry of Civil Affairs of Bosnia and Herzegovina	MoCA is responsible for matters of citizenship, residence, and issuance of travel documents, which are essential preconditions for labour mobility. It ensures that Bosnia and Herzegovina fulfils its international obligations concerning migrants and migrant workers, including the implementation of treaties and cooperation with international organisations. It also supports processes related to repatriation, return, and the issuance of documentation for BiH citizens abroad and for foreigners residing in BiH.
Labour and Employment Agency of Bosnia and Herzegovina	Migration-related competences of the Agency: i) Coordinates the employment of Bosnian and Herzegovinian citizens abroad within the limits of its legal competences and in cooperation with the entity employment services and the Brčko District Employment Service; ii) In cooperation with the entity employment services and the Brčko District Employment Service, provides opinions and proposals to the relevant ministry of Bosnia and Herzegovina regarding the employment of foreigners (quotas).

Institution/department	Responsibilities
Ministry of Labour and Social Policy of FBiH	Migration–Labour Related Responsibilities of the Ministry of Labour and Social Policy of FBiH: Labour and employment policy – designing and implementing employment measures, including those relevant for labour mobility; Labour relations and rights from employment – ensuring protection of workers’ rights, including those employed abroad or foreign workers in FBiH, in line with applicable laws; Licensing and monitoring recruitment agencies – authorising, supervising, and monitoring private employment agencies that mediate employment of BiH citizens abroad and recruitment of foreign workers in the Federation; International conventions – implementing and monitoring ratified international labour standards (e.g. ILO, EU conventions) that affect migrant workers’ rights and labour mobility; Contracts and bilateral agreements in labour and employment – negotiating, concluding, and implementing bilateral agreements with other countries on the regulation of employment and social security of migrant workers.
Ministry of Labour and Veterans’ and Disability Protection of Republika Srpska	Migration–Labour Related Responsibilities of the Ministry of Labour and Veterans’ and Disability Protection of Republika Srpska: Employment and labour relations – regulating employment relations, rights and salaries, including for workers employed abroad; Employment policy and protection at work – developing employment measures and ensuring occupational safety standards that also apply to migrant workers; Pension and disability insurance – managing pension and disability insurance schemes relevant for portability of rights of migrant workers; Temporary employment abroad – overseeing and coordinating the temporary employment of workers abroad in cooperation with the competent state-level ministry; Rights of workers employed abroad – safeguarding rights of workers temporarily employed abroad, including responsibilities for their return and reintegration into domestic employment; International labour conventions – implementing and monitoring international labour standards affecting migrant workers; Licensing and monitoring recruitment agencies – issuing licences, supervising the work of private employment mediation agencies, and revoking approvals in cases of non-compliance.

Institution/department	Responsibilities
Federal Employment Institute (Federation of Bosnia and Herzegovina)	The Federal Employment Institute is the central authority for employment services in the Federation of Bosnia and Herzegovina. In the area of labour migration, its most important function is the issuance of work permits to foreign nationals who seek employment within the Federation. These permits are issued in line with annual quotas adopted by the Government of the Federation, following the decision of the Council of Ministers of BiH. The Institute processes applications submitted by employers, verifies that all legal conditions are met, and ensures that priority is first given to available domestic workers. It also keeps detailed records on foreign employees and monitors trends in labour demand, thus contributing to the overall regulation of foreign labour in the Federation.
Employment Service of Republika Srpska (Republic of Srpska)	The Employment Service of Republika Srpska performs has a mandate to regulate the employment of foreign nationals in the entity. It issues work permits within the quotas established at the state level and approved by the RS Government. Employers who wish to hire foreign workers must apply to the Service, which then evaluates whether all statutory requirements have been fulfilled. An essential part of this process is verifying that no suitable domestic labour is available before granting approval to employ a foreign national. The Service maintains data on all foreign workers who have been granted permits and regularly informs the relevant institutions, thereby ensuring transparent management of labour migration in Republika Srpska.
Employment Service of Brčko District (Brčko District)	The Employment Service of Brčko District is responsible for the regulation of employment matters within the District, including the employment of foreign nationals. It issues work permits for foreigners in accordance with the quotas determined through consultations between the state-level Labour and Employment Agency and the Brčko District authorities. As in the other entities, the Service processes applications from employers, confirms that conditions for employment have been met, and checks the availability of domestic workers before issuing a permit. It also provides regular reports on the number and profile of foreigners employed in the District, ensuring alignment with BiH's broader quota and migration management system.

Institution/department	Responsibilities
Centre for Information and Recognition of Documents in the Field of Higher Education (CIP)	The Centre for Information and Recognition of Documents in the Field of Higher Education (CIP) mandate is to provide information and recognition services in higher education, coordinate international exchange of academic staff, students, and programmes, and represent Bosnia and Herzegovina in international projects and networks, particularly the ENIC/NARIC system. It issues opinions and recommendations on foreign diplomas and qualifications for the purposes of further study, employment, and the exercise of rights deriving from acquired qualifications, in line with the Lisbon Recognition Convention.

KOSOVO*

Institution/ department	Responsibilities
Ministry of Internal Affairs (MIA)	Is the central authority responsible for migration policies, border management, overseeing migration flows and integration of foreigners. Within the Ministry, the Department for Citizenship, Asylum, and Migration (DCAM) is responsible for deciding on residence permits, which are typically combined with work authorizations for foreign nationals. The Department for Reintegration of Repatriated Persons and Integration of Foreigners is responsible for designing, implementing, and monitoring policies for the integration of foreigners, including foreign workers with legal residence in Kosovo*. The Directorate for Migration and Foreigners (DMF) within the Police, supervises migratory movements and is notified upon the issuance of short-term work permits
Ministry of Finance, Labour, and Transfers (MFLT)	Is the competent authority responsible for drafting employment and vocational training policies and for assessing the financial implications of migration policies. MFLT is the lead ministry responsible for the licensing of non-public employment service providers.

92 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Institution/ department	Responsibilities
Kosovo* Employment Agency (EARK)	is an independent body operating under the MFLT. Its primary responsibilities in relation to foreign nationals include implementing employment policies tailored for foreign nationals seeking employment and issuing the Short-Term Work Permit for Foreigners (Certificate for Employment Notification). The Agency also provides official confirmation to the DCAM regarding the authorization of employment for foreigners applying for residence permits for work purposes (long-term visas). Additionally, EARK offers information and counselling related to labour migration and ensures access to the labour market and professional training services for foreigners.
Central Labour Inspectorate (Labour Inspectorate)	an independent executive agency operating under the MFLT. Its mandate include supervising and controlling the implementation of specific provisions of the Law on Foreigners related to working conditions, workplace protection, and other rights of foreign workers. The Inspectorate is authorized to impose fines and other sanctions on employers.
Ministry of Foreign Affairs and Diaspora (MFAD)	responsible for concluding agreements within this area (e.g. bilateral readmission agreements); issuing guidelines for the Visa Information System; and providing instructions on visa issuance procedures at diplomatic/consular missions and border crossings, etc.
Appeals Commission on Foreigners	a high-level, formal body ensuring inter-ministerial oversight in migration decisions. The Commission reviews appeals submitted by foreign nationals (or their representatives) against first-instance decisions on temporary residency permits (including denial or revocation), visas, and entry/exit denial. Its members include representatives of MIA, the Ministry of Justice, the MFAD, and the MFLT.

MONTENEGRO

Institution/ department	Responsibilities
Ministry of Interior (Moi)	is a central institution in labour migration management, exercising both decision-making and oversight functions. It issues permits for temporary residence, temporary residence and work, and permanent residence, and assesses compliance with statutory residence- and employment-related conditions. In addition to its gatekeeping role, the Moi has procedural competence to initiate actions in cases of non-compliance, including revocation of permits and the application of immigration enforcement measures. Through the Police Directorate, it monitors the lawful stay and movement of foreign workers and coordinates return and readmission procedures.

Institution/ department	Responsibilities
Ministry of Foreign Affairs	through its Visa Department, oversees the issuance of D visas via diplomatic and consular missions, maintains the Visa Information System (VIS), coordinates with other authorities and consular staff involved in visa processing
Ministry of Labour and Social Welfare	responsible for shaping Montenegro's policy on the employment and work of foreigners. Its competences include regulating the labour market, employment conditions, and wages; issuing and maintaining registers of licences for employment and temporary work agencies; preparing annual proposals for the quota of temporary residence and work permits for foreigners; aligning national legislation with the EU acquis in this area; and coordinating EU accession negotiation chapters 2 (Freedom of Movement for Workers) and 19 (Social Policy and Employment).
Labour Inspection Department	operating within the Ministry of Labour and Social Welfare after the transformation of the former Administration for Inspection Affairs, is responsible for supervising the implementation of labour and employment legislation and related by-laws. Its mandate includes conducting inspections, initiating misdemeanour and criminal proceedings, and proposing amendments to laws and regulations. The department also prepares analytical and reporting documents, coordinates risk management processes, and ensures cooperation with other public authorities, institutions, and private entities to improve compliance and working conditions
Employment agency Montenegro	a state agency that implements employment mediation and labour-market functions under the Law on Employment Mediation and Rights During Unemployment, other regulations, and its Statute, including delegated tasks. It provides the Ministry of Labour with an opinion on the annual quota for foreign workers and, for quota monitoring, receives from the Mol at least monthly data on issued temporary residence and work permits (by purpose), as well as structured data on foreigners (sex, age, nationality, education/ qualifications, occupation) and employers (sector, municipality of seat, place of work). Based on these inputs, EAM compiles and submits to the Ministry a quarterly report on issued permits, as required by the Decree on Criteria and Procedure for Determining the Annual Number of Temporary Residence and Work Permits for Foreigners.
Agency for National Security of Montenegro	In procedures for deciding on applications for a D visa and for a residence and work permit, the Agency for National Security of Montenegro receives the application from the competent authority for consent. Based on this, it conducts a procedure to determine whether there are any obstacles related to national or internal security

NORTH MACEDONIA

Institution/ department	Responsibilities
Ministry of Economy and Labour (MEL)	provides strategic oversight of the labour market, regulates working conditions and supervises private employment agencies. Two institutions operate under MEL, the Employment Agency (EA) and the State Labour Inspectorate (Labour Inspectorate).
Employment Agency (EA)	Is the principal labour-market “gatekeeper” for foreign employment. It (i) issues work permits for foreign nationals who already hold lawful residence on grounds other than employment and (ii) provides the formal labour-market opinion that underpins employment-related temporary residence decisions, based on demand signals and the availability of quota places. Beyond standard work permits, the Agency is also responsible for issuing Work Registration Certificates for specific categories of short-term professional engagement that are exempt from the full work permit requirement. This mandate derives from the Law on Employment and Work of Foreigners, its bylaws, and annual government decisions establishing foreign labour quotas. ^[i] The Labour Inspectorate is responsible for enforcing labour legislation, conducting inspections, and protecting the rights of all workers, including foreign nationals
Ministry of Internal Affairs (MIA)	regulates the stay of foreign nationals. This includes the issuance of temporary residence permits for employment purposes, as well as border control functions carried out by the Border Police.
Ministry of Foreign Affairs (MFA)	facilitates labour migration by processing visa applications through diplomatic and consular missions abroad. Its role includes verifying travel documents and identity and coordinating with the MIA and the EA to ensure compliance with national regulations. The MFA also supports bilateral agreements and international cooperation initiatives related to labour migration.
Ministry of Social Policy, Demography, and Youth	Is responsible for the design and implementation of social protection policies, including the provision of integration services for migrant workers. Delivery is channelled through a decentralised network of 30 Centers for Social Work across the country, which serve as the main operational structures for assessing social needs and delivering support services to migrants.

[i] “Програма на АВРСМ” [Programme of the AVRSM], Employment Service Agency of the Republic of North Macedonia, <https://av.gov.mk/programa-na-avrm.nspix>

SERBIA

Institution/ department	Responsibilities
Ministry of Interior	plays a central role as the authority responsible for deciding on applications for long-stay visas and single residence and work permits, controlling the movement and residence of foreign nationals, and preventing irregular migration. Its decision-making powers are exercised within a framework of mandatory inter-institutional verification and security screening.
Ministry of Labour, Employment, Veteran and Social Affairs	holds legislative and supervisory responsibilities in the field of employment. Within its institutional structure, the NES is responsible for assessing labour market conditions, issuing consents related to employment purposes, approving changes of employer or type of work, and conducting labour market needs assessments. The Labour Inspectorate , operating under the same ministry, is tasked with inspection oversight in the field of labour relations, occupational safety and health, and compliance with legal conditions for employing foreign nationals
Ministry of Foreign Affairs	Is responsible for facilitating the issuance of Type D visas through Serbia's diplomatic and consular network and plays a role in the initial verification of documentation submitted abroad. The SIA participates in the process by conducting security risk assessments, which are a mandatory component of decision-making for both visas and single permits

In addition to these core institutions, several other bodies contribute to the governance of labour migration through their respective mandates, including the Central Register of Mandatory Social Insurance, the Tax Administration, inspection bodies, judicial authorities, the Republic Public Prosecutor's Office and Business Registers Agency. Although these institutions do not have a direct mandate in the field of labour migration, they contribute to its governance indirectly through the exercise of their respective competences. What appears to be lacking in practice is a systematic awareness of this indirect role and of the relevance that information collected within their mandates may have for labour migration oversight and enforcement



Annex 2:

Data on Residence Permits Issued to Foreign Nationals

Note: Annex 2 presents data on residence and employment permits across the Western Balkan partners, drawn from various national sources. Due to differences in the categories used and in data production processes, these figures are not fully comparable. For this reason, the data are presented separately for each Western Balkan partner.

The diversity of data presented in this Annex reflects the differing administrative procedures and data collection practices across the Western Balkan partners, which limit cross-country comparability of figures and categories. Each partner collects distinct sets of data with varying degrees of disaggregation, often within separate institutional mandates, such as ministries of the interior, employment agencies or national statistical offices. Importantly, the absence of certain data or specific disaggregation in this report does not indicate that such information is not collected at the national level. Rather, these gaps reflect limitations in the data made available to the research team during the qualitative study, or in what was publicly accessible through online records at the time of data collection.

ALBANIA

The table 1 below presents the number of work permits issued to foreign nationals in Albania rose from 3,341 in 2020 to 8,305 in 2022, an increase of 148%; this sharp growth occurred in the immediate post-COVID period and may be related to the reopening of borders.

Table 1: Overview of work permits issued to foreign citizens in Albania in the period 2019-2022

Year	Work Permits Issued	Change Compared to Previous Year
2019	3,818	—
2020	3,341	–12%
2021	5,034	+51%
2022	8,305	+65%

Source: Albania, Ministry of Interior. *Extended National Migration Profile for the Years 2019–2022*. Tirana: Government of Albania, 2022

According to official data from the Institute of Statistics, indicate that Albania is attracting a rising number of foreign residents, primarily for work. The total number of foreigners with residence permits in Albania dramatically increased over the five-year period, from 13,609 in 2020 to 21,940 in 2024.

BOSNIA AND HERZEGOVINA

Table 2: Overview of work permits issued by activity to foreign citizens in BiH in the period 2020-2024

Activity	2020	2021	2022	2023	2024
Agriculture, forestry and fishing	24	33	45	48	74
Mining and quarrying	60	67	157	96	107
Manufacturing industry	278	233	312	297	844
Production and supply of electricity, gas, steam and air conditioning	21	16	32	29	23
Water supply, wastewater disposal, waste management and environmental remediation activities	2	2	3	4	5
Construction	209	286	884	1,368	1,305
Wholesale and retail trade; repair of motor vehicles and motorcycles	555	527	560	622	568
Transportation, storage and connections	59	56	64	52	43
Hotel and catering	149	153	130	188	570
Information and communications	82	100	117	129	104
Financial and insurance activities	37	40	30	24	26
Real estate business	321	343	356	298	313
Professional, scientific and technical activities	102	104	102	86	165
Administrative and auxiliary service activities	74	108	113	135	116
Public administration and defence, mandatory social security	1	0	0	4	1
Education	154	158	163	150	154
Activities of health and social protection	58	74	91	96	123
Arts, entertainment and recreation	196	281	370	436	532
Other service activities	178	180	236	506	709
Household activities	9	3	3	3	8
Activities of extraterritorial organizations and bodies	17	11	12	15	8

Source: Labour and Employment Agency of Bosnia and Herzegovina

KOSOVO*

Table 3: Number of temporary and permanent residence permits issued in the period 2021- 2024

Year	2021	2022	2023	2024
Total residence permits	4,511	6,475	7,027	8,011
Employment purposes	2,217	3,062	3,733	4.273

Source: GAP Institute, Emigration and the Labor Market in Kosovo*: The Untapped Potential of the Inactive Workforce, 2025.

MONTENEGRO

Table 4: Overview of Temporary Residence and Work Permits Issued within quota by Sector of Activity in the period 2019-2024

Activity	2019	2020	2021	2022	2023	2024
Agriculture, forestry and fisheries	428 (307 seasonal)	299 (141 seasonal)	397 (237 seasonal)	642 (292 seasonal)	548 (293 seasonal)	582 (260 seasonal)
Mining	87 (0 seasonal)	71 (0 seasonal)	56 (0 seasonal)	71 (0 seasonal)	65 (0 seasonal)	102 (0 seasonal)
Manufacturing	359 (22 seasonal)	270 (0 seasonal)	308 (6 seasonal)	373 (18 seasonal)	566 (20 seasonal)	582 (17 seasonal)
Electricity, gas, steam and air conditioning supply	57 (0 seasonal)	53 (0 seasonal)	48 (0 seasonal)	38 (0 seasonal)	65 (0 seasonal)	25 (0 seasonal)
Water supply; sewerage, waste management and remediation activities	67 (0 seasonal)	73 (0 seasonal)	81 (0 seasonal)	68 (0 seasonal)	104 (0 seasonal)	80 (0 seasonal)
Construction	5408 (83 seasonal)	5238 (27 seasonal)	4748 (17 seasonal)	5442 (48 seasonal)	5719 (70 seasonal)	6495 (47 seasonal)
Wholesale and retail trade; repair of motor vehicles and motorcycles	1112 (73 seasonal)	702 (5 seasonal)	778 (17 seasonal)	920 (20 seasonal)	1984 (22 seasonal)	1678 (24 seasonal)

93 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Activity	2019	2020	2021	2022	2023	2024
Transportation and storage	401 (63 seasonal)	241 (2 seasonal)	277 (27 seasonal)	337 (37 seasonal)	503 (40 seasonal)	454 (36 seasonal)
Accommodation and food service activities	4452 (2154 seasonal)	1367 (97 seasonal)	2303 (681 seasonal)	3508 (1144 seasonal)	4490 (1313 seasonal)	5493 (1293 seasonal)
Information and communication	335 (10 seasonal)	306 (1 seasonal)	396 (3 seasonal)	1270 (0 seasonal)	1948 (0 seasonal)	1404 (0 seasonal)
Financial and insurance activities	73 (0 seasonal)	34 (0 seasonal)	29 (0 seasonal)	80 (0 seasonal)	104 (0 seasonal)	77 (0 seasonal)
Real estate activities	120 (6 seasonal)	102 (0 seasonal)	85 (2 seasonal)	177 (12 seasonal)	387 (7 seasonal)	256 (7 seasonal)
Professional, scientific, innovative and technical activities	392 (4 seasonal)	358 (0 seasonal)	322 (0 seasonal)	923 (1 seasonal)	1235 (5 seasonal)	1324 (4 seasonal)
Administrative and support service activities	127 (4 seasonal)	155 (1 seasonal)	155 (1 seasonal)	320 (8 seasonal)	695 (7 seasonal)	535 (10 seasonal)
Public administration and defence; compulsory social security	0	0	0	0	0	0
Education	60 (0 seasonal)	77 (0 seasonal)	61 (0 seasonal)	125 (0 seasonal)	214 (0 seasonal)	263 (0 seasonal)
Human health and social work activities	118 (0 seasonal)	137 (0 seasonal)	151 (0 seasonal)	134 (0 seasonal)	291 (0 seasonal)	184 (0 seasonal)
Arts, entertainment and recreation	274 (31 seasonal)	185 (7 seasonal)	224 (19 seasonal)	217 (17 seasonal)	281 (11 seasonal)	277 (10 seasonal)
Other service activities	1708 (312 seasonal)	1616 (66 seasonal)	2354 (280 seasonal)	4072 (473 seasonal)	4601 (497 seasonal)	4928 (483 seasonal)

Activity	2019	2020	2021	2022	2023	2024
Activities of households as employers; undifferentiated goods- and services-producing activities of households for own use	4 (0 seasonal)	5 (0 seasonal)	9 (2 seasonal)	12 (0 seasonal)	0	9 (0 seasonal)
Activities of extraterritorial organisations and bodies	0	0	3 (0 seasonal)	0	6 (0 seasonal)	0 (0 seasonal)
TOTAL	15582	11289	12785	18729	23822	24748

Source: Employment Agency Montenegro.

NORTH MACEDONIA

Table 5: Overview of Work Permit Statistics in the period 2019-2025

Top Five Countries of Origin and Permits (2019–2025)

Country of Origin	Number of Permits
Turkey	2,961
India	929
Bangladesh	821
Nepal	671
Albania	194

Source: Ministry of Internal Affairs, 2026.

SERBIA

Table 6: Overview of Work Permit Statistics in the period 2019-2024

WORK PERMITS ISSUED BY THE YEAR						
	2019 ^[1]	2020 ^[2]	2021 ^[3]	2022 ^[4]	2023 ^[5]	2024 ^[6]
For employment	7.406 (1.205 women)	6.688 (1.130 women)	11.646 (1.568 women)	21.991 (3.761 women)	35.163 (6.671 women)	10.655 (2.141 women)
For seconded persons	1.080 (96 women)	1.784 (55 women)	5.952 (144 women)	5.514 (123 women)	5.012 (157 women)	1.904 (94 women)
For relocations within single company	1.516 (93 women)	1.087 (60 women)	5.952 (144 women)	2.687 (236 women)	2.832 (166 women)	675 (59 women)
For independent professionals	44 (0 women)	21 (0 women)	18 (0 women)	9 (0 women)	6 (1 women)	1 (0 women)
For self-employment	2.243 (610 women)	1.897 (555 women)	1.968 (548 women)	3.182 (872 women)	7.344 (1.902 women)	3.548 (985 women)
For training	49 (17 women)	28 (13 women)	39 (19 women)	52 (20 women)	67 (31 women)	12 (4 women)
Total work permits	12.338 (2.021 women)	11.505 (1.803 women)	22.026 (2.581 women)	33.435 (5.012 women)	50.424 (8.928 women)	16.795 (3.283 women)
Personal work permits	1.471 (663 women)	1.426 (666 women)	1.636 (788 women)	1.745 (907 women)	1.761 (949 women)	456 (227 women)
TOTAL	13.809 (2.684 women)	12.931 (2.479 women)	23.662 (3.369 women)	35.180 (5.919 women)	52.185 (9.877 women)	17.251 (3.510 women)

^[1] National Employment Service (NES), *Annual Report for 2019*

^[2] National Employment Service (NES), *Annual Report for 2020*

^[3] National Employment Service (NES), *Annual Report for 2021*

^[4] National Employment Service (NES), *Annual Report for 2022*

^[5] National Employment Service (NES), *Annual Report for 2023*

^[6] National Employment Service (NES), *Annual Report for 2024*.

Annex 3: **Labour Migration Governance** **– List of Key Legislation**

ALBANIA

Title of policy/law	Year	Description	Web link to source
Council of Ministers Decision No. 70	February 12, 2014	On Determining the Criteria, Documentation and Procedure for Issuing a Work Registration Certificate	LINK
Council of Ministers Decision No. 101	February 23, 2018	On the Method of Organization and Functioning of Private Employment Agencies. As amended.	LINK
Council of Ministers Decision No. 286	May 21, 2018	“On Some Special Rules for Temporary Employees Employed by Temporary Employment Agencies.” As amended.	LINK
Council of Ministers Decision No. 538	May 26, 2009	On Licenses and Permits Handled by or Through the National Licensing Center (NLC) and Some Other Joint Sub-Legal Regulations.” Updated.	LINK
Council of Ministers Decision No. 857	29 December 2021	“On the Establishment and Operation of the National Electronic Registry for Foreigners in the Republic of Albania”.	LINK
Council of Ministers Decision No. 858	29 December 2021	“On defining the criteria, procedures, and documentation for the entry, residence, and treatment of foreigners in the Republic of Albania”.	LINK
Joint Instruction No. 3	January 11, 2023	“Joint Instruction on Inter-Institutional Cooperation between the Responsible Authorities of the Ministry of Interior and the Responsible Authorities of the Ministry of Finance and Economy, for Determining the Procedures for Approving the Unique Permit”.	LINK

Title of policy/law	Year	Description	Web link to source
Joint Instruction No. 196	October 14, 2024	“On Cooperation Between the Structures of the Ministry of the Interior, the Ministry of Economy, Culture, and Innovation, and the State Information Service Regarding the Procedures for Issuing Residence Permits for Foreigners”	LINK
Labour Code, Nr. 7961/1995.			LINK
<i>Law on Foreigners</i> , No. 79/2021			LINK
Law on Foreigners, No. 79/2021.	Updated 2025.		LINK
Law on Inspection, No. 99/2024			LINK
Law No. 39/2025 on the State Border Control			LINK
Law No. 82/2024 on State Police	dated July 26, 2024.		LINK
Law No. 10081	23 February 2009	“On Licenses, Authorizations and Permits in the Republic of Albania.” Updated edition.	LINK
National Employment and Skills Strategy	(2023–2030)		LINK
National Strategy for Migration of the Republic of Albania	(2024–2030) and its Action Plan (2024–2026)		LINK

BOSNIA AND HERZEGOVINA

Title of policy/law	Year	Description	Web link to source
Law on Foreigners	2015, revisions in 2021	The Law on Foreigners provides the legal framework for regulating the entry, stay, and movement of foreign nationals in BiH. It outlines the procedures for obtaining visas, residence permits, and work permits. The law also sets criteria for granting international protection to foreigners, establishes grounds for deportation, and defines the responsibilities of relevant authorities in enforcing immigration laws.	The BiH Official Gazette", No. 88/15, and 34/21 LINK
Law on Asylum	2016	The Law on Asylum governs the process of granting asylum and international protection to individuals who seek refuge in BiH due to persecution, conflicts, or generalized violence. It establishes the criteria for determining refugee status, procedures for lodging and examining asylum applications, and the rights and obligations of asylum seekers and recognized refugees. The law also addresses the establishment and functioning of reception centres for asylum seekers.	Official Gazette of BiH", No. 11/16 LINK
Strategy and Action Plan on Migration and Asylum	2008-2011	The strategy defines the main topics as: visas, border control. Immigration and asylum, and readmission. The goal specified was to develop a system for managing borders, visa regime, immigration and asylum in BiH according to the EU standards.	LINK
Strategy and Action Plan on Migration and Asylum	2012-2015	Mid-term strategic goals, defined for the period 2012 – 2015 are the following: Enhancement of the system of entry and stay control of foreigners in Bosnia and Herzegovina; Enhancement of the quality of international and temporary protection (asylum) in Bosnia and Herzegovina; Increasing efficiency of monitoring and control of the state border of Bosnia and Herzegovina;	LINK

Title of policy/law	Year	Description	Web link to source
		Enhancement of the fight against illegal migrations in Bosnia and Herzegovina; Contribution to the reduction of human trafficking in Bosnia and Herzegovina; Strengthening institutional capacities in Bosnia and Herzegovina with the purpose of connecting migration and development; Ensuring overall integration of foreigners who reside in Bosnia and Herzegovina legally and Establishment of Permanent Coordination System in the realization of migration policy of Bosnia and Herzegovina.	
Strategy and Action Plan on Migration and Asylum	2016-2020	Medium term strategic goals, as defined for the period 2016 – 2020, are the following: 1) Improving the system of control of entry and stay of aliens in Bosnia and Herzegovina; 2) Strengthening capacities in the area of asylum in Bosnia and Herzegovina; 3) Increasing efficiency of control of the state border of Bosnia and Herzegovina; 4) Improvement of the fight against illegal migrations in Bosnia and Herzegovina; 5) Contribution to the reduction of human trafficking in Bosnia and Herzegovina; 6) Strengthening institutional capacities in Bosnia and Herzegovina with objective of linking migration and development; 7) Establishing of a system for monitoring of integration of aliens who reside legally in the territory of Bosnia and Herzegovina; and 8) Establishing of a Permanent Coordination System in the implementation of migration policy of Bosnia and Herzegovina.	LINK

Title of policy/law	Year	Description	Web link to source
Strategy and Action Plan on Migration and Asylum	2021-2025		LINK
Rulebook on the content, manner of keeping and use of official records on foreigners	2016	It regulates the content, manner of keeping and use of official records on foreigners	Official Gazette of BiH" No. 51/16 LINK
Rulebook on entry and stay of aliens		This Rulebook shall stipulate: the procedures for entry of aliens in Bosnia and Herzegovina (hereinafter: BiH); refusal of entry; certification of invitation letter; issuance of visas at the border; visa extension; visa cancellation and revocation; approval of residence and issuance of residence permits; issuance of certificates on identity; work registration certificates; registration and deregistration of permanent and temporary residence; issuance of Alien ID Card; termination of residence; cancellation of residence; certification of the Book of Aliens, as well as other issues related to the entry, movement and stay of aliens in BiH.	Official Gazette of BiH" No. 36/08, 87/12 LINK
Rulebook on the Central Database on Foreigners	2017	This rulebook determines the authority for the conduct, content and rules on management, use, protection and storage of data and the procedure for deleting data, as well as the rules for accessing data in the Central Database on Foreigners. The central database on foreigners is part of the Information System for Migration; it is maintained in electronic form and contains data from official records maintained on the basis of the Law on Foreigners and the Asylum Law.	Official Gazette of BiH" No. 19/17

KOSOVO***Relevant laws**[LINK to all laws](#)*Law No. 04/L-216, on Cooperation between Authorities Involved on Integrated Border Management. No. 04/L-216*[LINK](#)*Law No. 04/L-205, on the Employment Agency. 04/L-205*[LINK](#)*Law No. 04/L-219, on Foreigners. No. 04/L-219*[LINK](#)*Law No. 08/L-067, on Inspections No. 08/L-067*[LINK](#)*Law No. 03/L-212 on Labour, No. 03/L-212*[LINK](#)*Law No. 2002/9, on Labour Inspectorate. No. 2002/9*[LINK](#)*Law No. 03/L-017, on Amendment and Supplementation of the Law on Labour Inspectorate No. 2002/9*[LINK](#)*Law No. 06/L-036, on Amending and Supplementing the Law No. 04/L-219 on Foreigners. No. 06/L-036*[LINK](#)*Law No. 05/L-077 on Registration and Providing of the Services for Unemployed, Jobseekers and Employers. Official Gazette No. 26.*[LINK](#)**Administrative instructions***Administrative Instruction (MLSW) No. 02/2018, on Amendment and Supplementation of Administrative Instruction No. 03/2015 on Licensing of Non-Public Employment Service Providers*[LINK](#)*(GRK) No. 05/2022, on the Appeals Commission on Foreigners*[LINK](#)*Administrative Instruction (MIA) No. 09/2019, On the Procedure and Criteria for Issuing Residence Permits for Foreigners*[LINK](#)*Administrative Instruction (MIA) No. 10/2020, on Conditions and Procedures for the Issuance of the Visas at the Border Crossing*[LINK](#)*Administrative Instruction (MLSW) No. 03/2015, on Licensing of Non-Public Employment Service Providers*[LINK](#)*Regulation (GRK) No. 09/2019, for the Integration of Foreigners*[LINK](#)**Policy***Development Strategy of the Labour Inspectorate 2023–2027*[LINK](#)*Employment Strategy 2024–2028*[LINK](#)*Ministry of Internal Affairs. Policy Action Plan for the Implementation of the Migration Strategy 2024–2025*[LINK](#)*National Strategy Against Trafficking in Human Beings 2022–2026*[LINK](#)*The State Strategy on Integrated Border Management 2020–2025.*[LINK](#)*Ministry of Internal Affairs. Strategy on Migration 2021–2025. Pristina: Ministry of Internal Affairs of Kosovo, 2021*[LINK](#)

94 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

MONTENEGRO

Relevant laws and agreements

Strategy on Migration and Reintegration of Returnees 2021-2025	LINK
National Sustainable Development Strategy until 2030	LINK
Regulation on the Visa Regime	LINK
Regulation on the Criteria and Procedure for Determining the Number of Work Permits for Foreigners	LINK
Strategy for Combating Trafficking in Human Beings 2019-2024	LINK
Decree on the Criteria and Procedure for Determining the Annual Number of Temporary Residence and Work Permits for Foreigners	LINK
Law on Foreigners	LINK
Law on Employment Mediation and Rights During Unemployment	LINK
The Labour Law	LINK
Law on General Administrative Procedure	LINK
Law on International and Temporary Protection of Foreigners	LINK
Law on Border Control	LINK
Rulebook on the Detailed Conditions for Issuing a Long-Stay Visa (Visa D)	LINK
Rulebook on Forms, Detailed Conditions, and the Procedure for Issuing Temporary Residence Permits and Temporary Residence and Work Permits	LINK
Rulebook on Accommodation for Unemployed Persons Offered Employment Outside Their Place of Residence	LINK

NORTH MACEDONIA

Relevant laws and agreements	Year	
Law on Amending and Supplementing the Law on Employment and Work of Foreigners. Official Gazette of the Republic of North Macedonia, no. 163 (July 16).	2021	LINK
Law on Amendments to the Law on Foreigners. Official Gazette of the Republic of North Macedonia, No. 193	September 18, 2025	LINK
Law on Amending and Supplementing the Law on Records in the Field of Labour. Official Gazette of the Republic of Macedonia, no. 147 (August 27)	2015	LINK
Law on Border Control (Cleaned Text).” Official Gazette of the Republic of Macedonia.		LINK
Law on Employment and Work of Foreigners. Official Gazette of the RM, no. 217 (December 11).	2015	LINK
Law on Foreigners. Official Gazette of the Republic of Macedonia, no. 97 (May 28).	2018	LINK
Law on Labour Inspection (Consolidated Text). Official Gazette of the Republic of Macedonia.	2017	LINK
Law on Labour Relations (Consolidated Text). Official Gazette of the Republic of Macedonia.	2023	LINK
Law on Police (Editorial Cleaned Text). Official Gazette of the Republic of North Macedonia.		LINK
Law on Private Employment Agencies. Official Gazette of the Republic of Macedonia, no. 113 (June 20).	2018	LINK
Law on Records in the Field of Labour. Official Gazette of the Republic of Macedonia, no. 16/04.	2004	LINK
Resolution on Migration Policy 2021–2025. Official Gazette of the Republic of North Macedonia.	2021	LINK
Rulebook on the Form and Content of the Application Form and the Necessary Documentation for the Establishment of a Private Employment Agency. Official Gazette of the Republic of Macedonia, no. 173 (September 17).	2018	LINK
Rulebook on the Form and Content of the Misdemeanour Payment Order. Official Gazette of the Republic of North Macedonia, no. 195 (July 30).	2020	LINK
Rulebook on the Procedures for the Issuance of Work Permits, the Form and Content of the Work Permit, and the Procedure for the Registration and Completion of Work Performed by Foreigners. Official Gazette of the Republic of Macedonia, no. 108 (September 10).	2007	LINK
Strategy for the Formalization of the Informal Economy in the Republic of North Macedonia 2023–2027. Ministry of Finance.	2023	LINK

SERBIA

Relevant laws and agreements

Memorandum on Cooperation in the Field of Employment between the Ministry of Labour, Employment, Veteran and Social Affairs of the Republic of Serbia and the Ministry for National Economy of Hungary	LINK
Protocol on Cooperation between the Ministry of Labour, Employment, Veteran and Social Affairs of the Republic of Serbia and the Ministry of Labour, Social Affairs and Family of the Slovak Republic	LINK
Law on the Ratification of the Agreement between the Government of the Republic of Serbia and the Council of Ministers of Bosnia and Herzegovina on the Temporary Employment of Nationals of the Republic of Serbia in Bosnia and Herzegovina and Nationals of Bosnia and Herzegovina in the Republic of Serbia	LINK
Law on the Ratification of the Agreement between the Government of the Republic of Serbia and the Government of the Republic of Belarus on the Temporary Employment of Nationals of the Republic of Serbia in the Republic of Belarus and Nationals of the Republic of Belarus in the Republic of Serbia	LINK
Law on the Ratification of the Agreement between the Government of the Republic of Serbia and the Government of the Republic of Slovenia on the Employment of Nationals of the Republic of Serbia in the Republic of Slovenia	LINK
Agreement on Conditions for Free Access to the Labour Market in the Western Balkans	LINK
The Strategy on Economic Migration	LINK
Migration Management Strategy	LINK
Integrated Border Management Strategy of the Republic of Serbia for the period 2022–2027	LINK
Action Plan for the Accession of the Republic of Serbia to the Schengen Area	LINK
Law on the Employment of Foreign Nationals	LINK
Law on Foreigners	LINK
Law on Simplified Work Engagement in Seasonal Jobs in Certain Activities	LINK
Law on Agency Employment	LINK
Law on Employment and Unemployment Insurance	LINK
Law on Occupational Safety and Health	LINK
Labour Law	LINK
Law on Companies	LINK
Law on the Central Register of Mandatory Social Insurance	LINK
Law on General Administrative Procedure	LINK
Law on Misdemeanours	LINK
Criminal Code	LINK
Law on Inspection Supervision	LINK
Law on Border Control	LINK



Annex 4: **Skills Mobility Partnerships in the Western Balkans**

Skills mobility partnerships in the Western Balkans

by Laetitia Hohwieler, Caitlin Katsiaficas & Maegan Hendow

Executive summary

This paper presents an analysis of a mapping of Skills Mobility Partnerships (SMPs) in the Western Balkans, undertaken to inform the *Preventing Secondary Irregular Migration Movements to the EU* (PSIMM) project. SMPs are bilateral or multilateral partnerships designed to create mutually beneficial outcomes by linking skills development with mobility, enabling migrants to enhance or acquire professional skills. The mapping focuses on government-to-government partnerships (at any level) involving at least one Western Balkan partner that combine practical skills development with mobility opportunities. It covers SMPs that were in effect at any point between January 2015 and December 2025.

The findings indicate that the Western Balkans has predominantly functioned as a region of origin. Nevertheless, all partners participate in arrangements that support mobility in both directions, acting as both countries of origin and destination. Bosnia and Herzegovina represents a particular case, with one partnership involving Egypt in which it acts solely as a country of origin, illustrating emerging priorities as the region increasingly positions itself as a destination.

SMP designs vary considerably depending on their objectives. Within the Western Balkans, project-based initiatives are the most common form of government-led SMPs. Across the identified partnerships, there is a clear emphasis on individuals with intermediate skill levels, reflecting labour market needs in key sectors such as construction and healthcare. Approximately half of the partnerships include components targeting young people, underlining their importance for youth engagement and opportunity creation. In terms of skills development, on-the-job training is the most prevalent approach, followed by language training. A significant proportion of SMPs are designed with a return component, which can support skills circulation and the transfer of knowledge between countries of origin and destination.

A central finding of the analysis is that the effectiveness of SMPs depends significantly on the provision of adequate integration support and the recognition of qualifications. As the region seeks to transition into a destination, these factors will be critical to retaining skilled workers in the labour market and ensuring the long-term success of such initiatives. Addressing these issues will be essential to maximising the benefits of SMPs for both the Western Balkans and their partner countries.

i. Introduction

Labour mobility has long been used as a strategy to address labour and skills needs and to provide economic opportunities. In recent years, Skills Mobility Partnerships (SMPs) and similar frameworks, including Global Skills Partnerships and Talent Partnerships, have gained momentum, although they currently represent only a small share of global labour and skills mobility. SMPs are bilateral or multilateral partnerships that combine skills development with mobility, with the aim of fostering mutual benefits for countries of origin and destination, as well as for migrants and employers. Compared to more traditional labour migration approaches, SMPs can therefore offer greater mutual benefits, which is particularly important for countries of origin given the potential impacts of emigration on their labour markets and societies.

The Western Balkans region has recently begun to position itself as a destination region. This shift reflects growing efforts to attract foreign workers to address labour shortages, which are due in part to sustained emigration from the region. Against this backdrop, this paper contributes to the Preventing Secondary Irregular Migration Movements to the EU (PSIMM) project, which examines labour recruitment systems across the Western Balkans. The paper complements analysis conducted across the region and feeds into the development of a roadmap for future work in this area.

By mapping and analysing governmental SMPs in the Western Balkans, this paper aims to provide an overview of the current landscape in the region, including the identification of key features, common patterns, and notable differences. Ultimately, it seeks to inform discussions on the potential for SMPs in the Western Balkans as the region seeks to attract global talent in line with evolving labour market needs.

The paper proceeds as follows. First, SMPs and their potential purposes and functions are introduced. Second, the methodology used for the mapping is outlined. Third, the main findings are presented, including a comparison of results from the Western Balkans with a broader mapping conducted by ICMPD under the EU-funded Link4Skills project. Finally, the paper concludes with key takeaways for the Western Balkans region.

ii. Skills mobility partnerships: A promising model?

Skills mobility partnerships (SMPs) are typically government-led initiatives designed to promote joint and balanced, as well as development-sensitive and sustainable, models of labour migration. Their aim is to deliver a ‘quadruple-win’ outcome, benefiting migrants, countries of origin, destination partners and employers alike, while fostering long-term development impacts that extend beyond individual mobility.⁹⁵

SMPs have gained traction in the context of labour shortages and demographic challenges in many origin and destination countries, alongside growing concerns about the potential negative impacts of traditional international recruitment models.⁹⁶

95 European Migration Network (EMN) & Organisation for Economic Co-operation and Development (OECD) (2022), Skills Mobility Partnerships: Exploring Innovative Approaches to Labour Migration, <https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/migration/2022-March-Joint-EMN-OECD-Inform-Skills-Mobility-Partnerships.pdf>.

96 Katsiaficas, C. & Kessler, S. (forthcoming), “Skills Mobility Partnerships: Addressing global skills shortages more fairly?,” In Grabowska, I. & Setrana, M.B., eds, Fair Skilled Migration Manifesto. Routledge.

At the same time, it should be noted that SMPs face challenges related to both effective implementation and scalability. Securing employers' buy-in remains a key constraint, particularly due to employers' limited familiarity with, or uncertainty about, the training pathways and qualifications of SMP participants, as well as the often lengthy processing times for visas and work permits required for international recruitment.⁹⁷ Such employer participation is crucial, as employers provide the direct link to employment opportunities and contribute the funding needed to ensure the long-term sustainability of SMPs. A further, closely related challenge is that SMPs largely depend on existing migration pathways and their eligibility requirements, which tend to prioritise highly skilled profiles, limiting the scope for engaging workers with medium- or lower-level qualifications⁹⁸ and may overlook people with the skills needed by the private sector.⁹⁹ Another factor that can limit their impact is the typically small size of SMPs as they currently stand. It is clear that SMPs are a long-term, and often resource-intensive, strategy rather than a quick fix.¹⁰⁰

Despite these limitations, there are several reasons why SMPs present a valuable opportunity. Many SMPs are designed to address specific skills and labour needs in both origin and destination contexts and are therefore considered better placed to contribute to brain gain, and to mitigate brain drain, by investing in training to expand the pool of available skills. Furthermore, SMPs can be used to test and refine schemes and to create the necessary enabling ecosystem—such as trust, skills development systems, and institutional cooperation—before scaling up. Participation in an SMP can also support the formalisation of existing migration corridors, improving their structure and strengthening the protection of migrants' rights. Moreover, SMPs can serve as a diplomatic tool to facilitate the creation of labour migration pathways and skills development opportunities.

iii. Methodology

Drawing upon the broad definitions of SMPs articulated by IOM¹⁰¹ and the OECD,¹⁰² ICMPCD's mapping of SMPs takes a broad approach to analysing partnerships at the intersection of skilling and mobility. It includes SMPs that:

- engage government bodies on both sides (at any level);
- combine practical skills development with mobility for some or all participants;
- include a Western Balkans partner (Albania, Bosnia and Herzegovina (BiH), Kosovo^{103*}, Montenegro, North Macedonia, and Serbia); and
- were launched or in operation at any point between January 2015 and December 2025.

97 EMN & OECD, Skills Mobility Partnerships; Hooper, K. & Sohst, R. (2024), Competing for talent: What role can employment- and skills-based mobility projects play? Migration Policy Institute (MPI), <https://www.migrationpolicy.org/research/competing-talent-mobility-projects>.

98 Knoll, A. (2024), Re-thinking approaches to labour migration? Potentials and gaps in EU member states' migration infrastructures. Migration Partnership Facility, ICMPCD & European Centre for Development Policy Management, <https://www.migrationpartnershipfacility.eu/knowledge/resources/47-mapping/299-mapping-legal-pathways-horizontal-report-2024>.

99 Business Advisory Group on Migration, International Organisation of Employers (2024), Engaging with Employers in Skills Mobility Partnerships, <https://www.ioe-emp.org/index.php?eID=dumpFile&t=f&f=159890&token=0af6889dcf2957fc44cae460b9d6ef24fa0cc83c>.

100 EMN & OECD, Skills Mobility Partnerships; Hooper & Sohst, Competing for talent.

101 International Organization for Migration (n.d.), Skills mobility partnerships: Towards a global approach to skills development and labour mobility, <https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/skills-mobility-partnerships.pdf>.

102 OECD (2024), Engaging with Employers in Skills Mobility Partnerships, policy paper no. 2024/01, Paris: OECD Publishing, <https://doi.org/10.1787/9e6da0ff-en>.

103 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

This paper builds on research conducted under the Link4Skills project,¹⁰⁴ which looked at SMPs involving one or more project country (Austria, Canada, Germany, Ghana, India, Indonesia, Morocco, the Netherlands, Nigeria, the Philippines, Poland, and Ukraine). Both the Link4Skills and Western Balkans mappings are based on extensive desk research, drawing on publicly available primary sources such as international agreements, memoranda of understanding (MoUs), project websites, and news articles, as well as secondary sources. In addition, initial findings were presented to partners in the region for feedback during the Workshop for Validation of Comparative Analyses Report and the Regional Roadmap, held 19-20 February 2026 in Tirana, Albania.

The inventory captures 18 data points (see Annex 4.2), which were selected and validated with partners and guided by both conceptual and practical considerations. The chosen parameters primarily reflect the design of the SMPs, as these could be captured through desk research. They also include aspects that capture practical constraints and recurring criticism of labour mobility initiatives in the current policy debate; these include, for instance, the number of participants.¹⁰⁵ Further limitations are discussed in Annex 4.3.

iv. Analysis of skills mobility partnerships in the Western Balkans

Based on the abovementioned criteria, 14 SMPs were identified in the Western Balkan region (see Annex 4.1 for the full list). This section draws out key findings from the analysis of these SMPs, highlighting how these trends compare to the broader Link4Skills mapping (of 156 SMPs), where relevant. In particular, this section analyses how SMPs in the Western Balkans have been structured in terms of stakeholders involved, planned mobility, and skilling elements. While most of the SMPs identified were developed in consideration of Western Balkans partners as origins rather than destinations, the insights point to lessons that can be taken up if Western Balkans partners opt to engage in SMPs as a destination.

In addition to the 14 SMPs identified in the Western Balkans, the research team also identified several partnerships that supported skills development and mobility but did not meet the criteria applied in this study. These included, in particular, initiatives involving primarily non-governmental actors on one or both sides. In most cases, these partnerships continued to position the Western Balkans mainly as a region of origin and therefore broadly align with the overall SMP analysis in that respect. While these initiatives are not included in the analysis below, as they fall outside the scope of this research, they nonetheless illustrate that partnership models engaging non-governmental actors may be particularly relevant for the Western Balkans context.¹⁰⁶

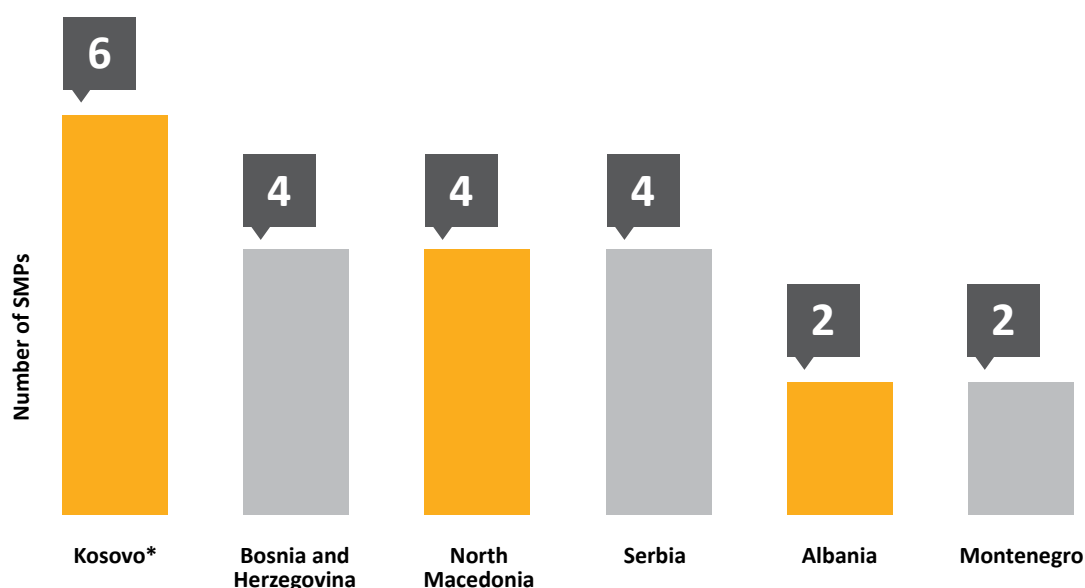
¹⁰⁴ See <https://link4skills.eu/>.

¹⁰⁵ See for example OECD & European Migration Network (2022), Skills mobility partnerships: Exploring innovative approaches to labour migration, EMN-OECD Inform, <https://www.oecd.org/content/dam/oecd/en/topics/policy-issues/migration/2022-March-Joint-EMN-OECD-Inform-Skills-Mobility-Partnerships.pdf>.

¹⁰⁶ These include projects were between non-governmental organisations, such as the VETtoVET capacity building project, with vocational training institutes in Montenegro, Kosovo*, BiH, Italy, the Netherlands, Finland, Slovenia, and Croatia, and the Western Balkanship project, a student mobility programme between the Western Balkans and Italy.

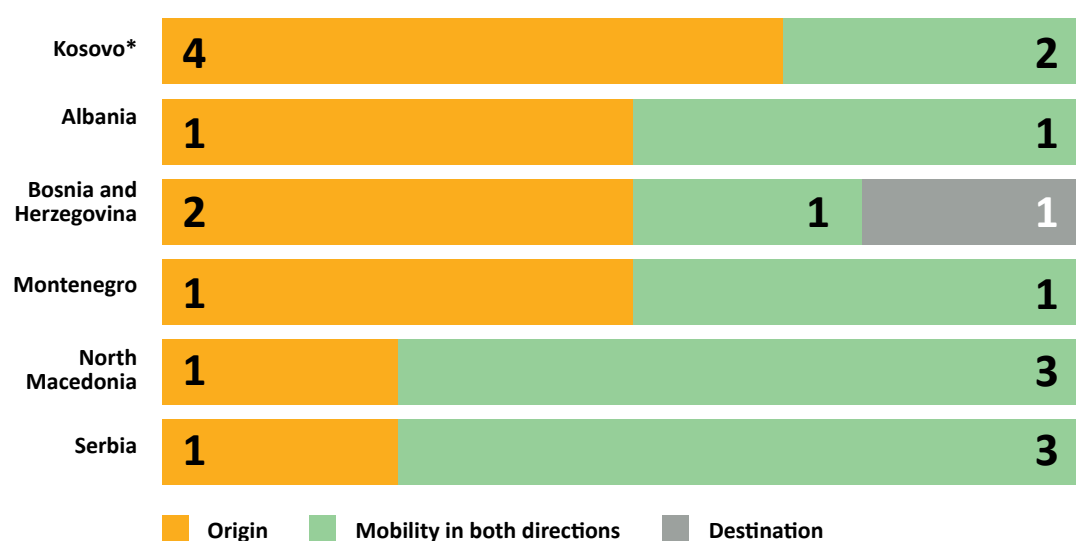
* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Figure 1: Some engage more frequently in SMPs than others.



The above data show how often the partners engage in SMPs, whether as a destination, origin, or both. Additionally, many SMPs in the Western Balkans include more than one origin. While there is some variation, partners are currently engaged in a relatively small number of SMPs.¹⁰⁷

Figure 2: The region still acts mainly as an origin; however, all partners are engaged in SMPs featuring mobility in both directions.

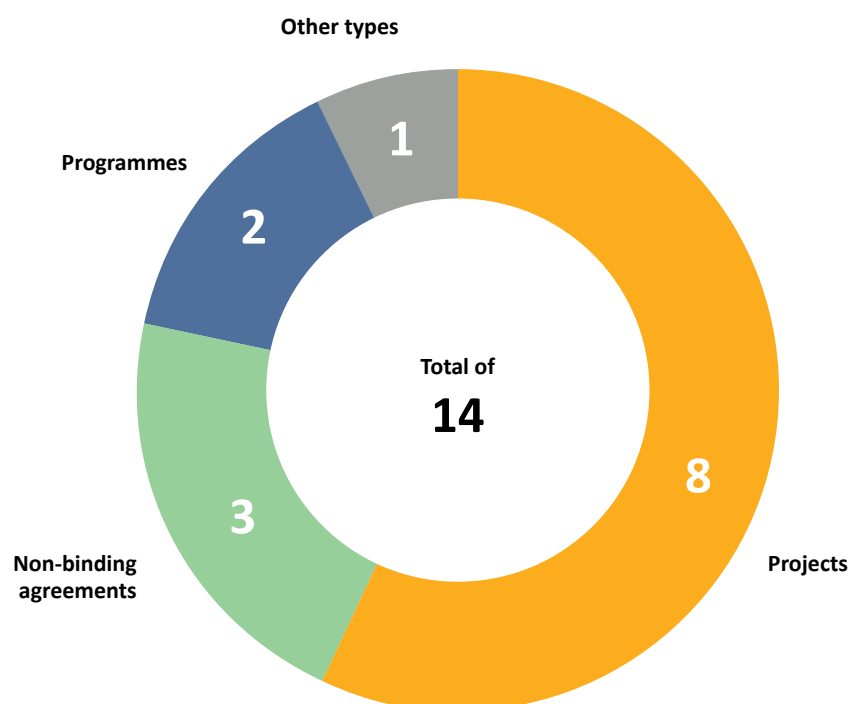


¹⁰⁷ *This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

In the SMPs identified, the Western Balkans acts mainly as a region of origin. However, several SMPs are reciprocal, meaning that mobility is designed to go in both directions. Reciprocal SMPs are not uncommon: close to one-third of those mapped for the Link4Skills mapping were reciprocal (46 out of the 156). In the Western Balkans mapping, 4 of the 14 SMPs were reciprocal. In both mappings, the reciprocal partnerships often include more than one origin; this is why all partners have at least one reciprocal partnership. The reciprocal partnerships in Western Balkan region are mainly EU programmes, such as the European Solidarity Corps, or the ERASMUS+ traineeship schemes and ERASMUS+ training courses, where some of the Western Balkan partners take part. Aside from these EU initiatives, the Joint Declaration of Intent between the Federal Ministry of Health of the Federal Republic of Germany and the Ministry of Health from Kosovo^{108*} includes reciprocal mobility, in this case the mutual exchange in the training of health care professionals.

Notably, in December 2025, BiH signed a bilateral Cooperation Protocol with Egypt to enhance labour mobility, skill exchange, and workforce development where BiH acts solely as a destination – this is the only such case identified in the region. This may be the first indicator of the region leveraging of SMPs to situate itself increasingly as a region of destination, particularly given that all other partnerships identified were concluded prior to 2022.¹⁰⁹ While only one SMP treats the Western Balkans as a destination, its recent occurrence compared to the others could indicate this new direction.

Figure 3: Projects are the most common types of governmental SMPs in the Western Balkans.



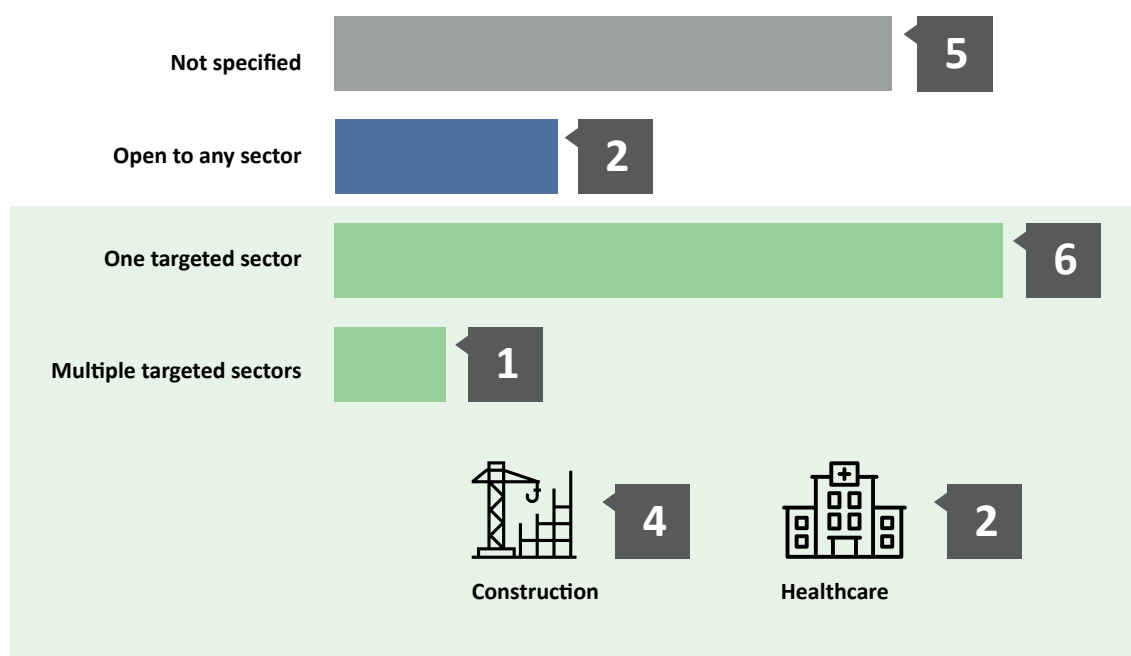
108 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

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Skills mobility partnerships (SMPs) can take a range of forms, reflecting different modes of existing and potential cooperation between partners. These approaches span from formal agreements, such as legally binding bilateral accords that establish clear obligations between the parties, to non-binding instruments, including memoranda of understanding or cooperation, which set out shared objectives and frameworks for collaboration without legal enforceability. They also include project-based initiatives, which are typically time-bound and designed to achieve specific outcomes, including pilot actions. Each cooperative approach offers distinct advantages, depending on the concrete objectives of the partners involved and the interests of relevant stakeholders.

Figure 3 illustrates the various types of SMPs identified in the Western Balkans mapping. In the Western Balkans, the most prevalent category is projects, accounting for 57%, followed by non-binding agreements at 21%, programmes at 14%, and other types of partnerships at 7%. These eight projects vary widely in terms of scope, scale, and sector: from facilitation of mobility in the crafts (Craftsmanship offers a future), healthcare (*Triple Win Nurses*), or construction (*tQMP Bau Academy; Vocational Training Partnership: LBB Initiative; Youth, Employment and Skills in Kosovo** (YES)) sectors to student mobility (*Erasmus+ training courses; tQMP Bau Academy*) and the mobility of volunteers for non-profit work (*European Solidarity Corps*). Six of the eight projects involve Germany as destination country, suggesting that a projectised SMP approach is highly relevant for this partner.

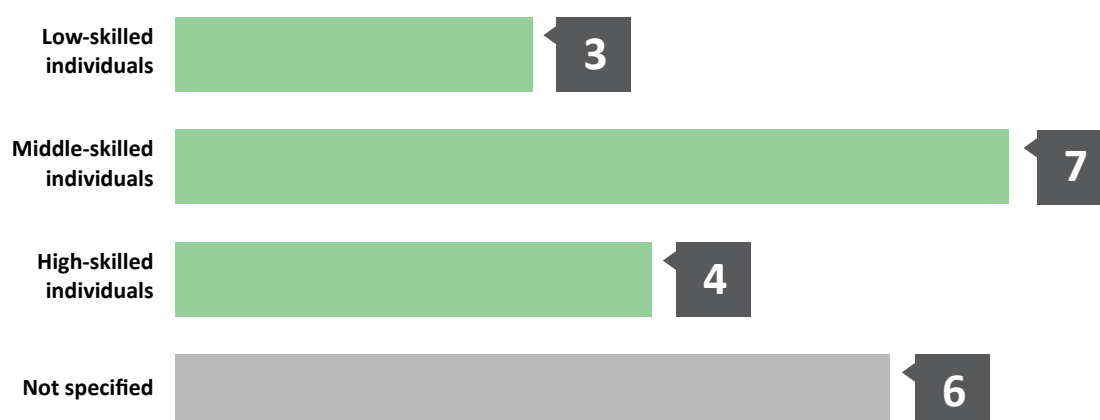
Figure 4: There is an even split between the SMPs targeting specific sectors or occupations and the SMPs that leave this open or unspecified.



110 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

While some SMPs opt to target specific labour market sectors, others opt for open participation or leave this unspecified. Among the SMPs focusing on particular sectors, most SMPs in the Western Balkans currently target one specific sector. The most commonly targeted sectors are construction (4) and healthcare (2). For the construction sector, all of the SMPs identified were with Germany, three of which were projects (*tQMP Bau Academy*; *Vocational Training Partnership: LBB Initiative*; *YES*). For the healthcare sector, these were also both with Germany as a country of destination (Joint Declaration of Intent between the Federal Ministry of Health of the Federal Republic of Germany and the Ministry of Health from Kosovo^{111*}; *Triple Win Nurses*). In all but one of these sector-specific partnerships (*Triple Win Nurses*), training was organised in the country of destination. Both the four SMPs in the construction sector and the two SMPs involving healthcare are with Germany, suggesting that initiatives with Germany are often aimed at addressing specific in-demand skills.

Figure 5: SMPs in the Western Balkan region primarily target middle-skilled individuals.



Note: Overlap exists, as SMPs may enable the participation of more than one skill level.

The graph above illustrates the skill levels targeted by SMPs as entry requirements for participants, that is, at the point of their initial participation. High-skilled participants are defined as individuals possessing advanced expertise and qualifications, typically demonstrated through higher education degrees or specialised professional certifications. These participants have acquired in-depth knowledge and technical competencies that enable them to perform complex and specialised roles.

Middle-skilled participants generally hold technical or vocational qualifications, such as associate degrees or vocational training certificates, and possess intermediate-level skills that allow them to carry out specialised tasks across a range of sectors. This category also includes current students who are still in the process of completing a higher education degree and who participate in SMPs alongside their studies. Low-skilled participants, by contrast, typically have basic skills and limited

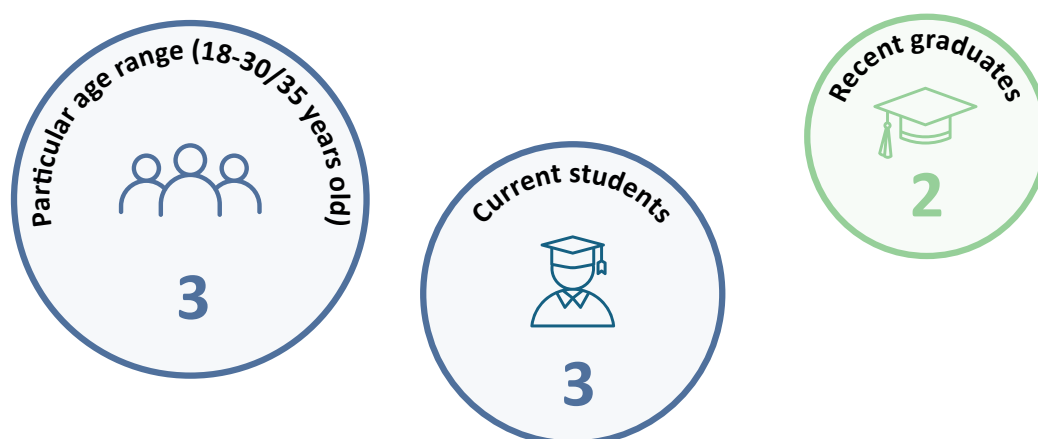
¹¹¹ * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

formal education or training. They are more often engaged in routine, manual or low-qualification occupations that do not require extensive formal credentials.

Within the mapping of SMPs in the Western Balkans, middle-skilled individuals constitute the most common target group, featuring in seven partnerships, followed by high-skilled individuals (four) and low-skilled individuals (three). In six of the identified SMPs, the targeted skill level was not specified. Examples of middle-skilled target groups in Western Balkan SMPs include individuals employed in craft occupations, current students and nurses. Some overlap exists across categories, as several SMPs are open to participants with more than one skill level (for example, current students and recent graduates; see Figure 6).

In addition, some SMPs apply alternative terminology to describe skills requirements that cannot be readily classified within the low-, middle- or high-skilled framework due to insufficient detail. For instance, under the Memorandum of Understanding between the Ministry of Labour and Social Policies of the Italian Republic and the Ministry of Labour, Social Affairs and Equal Opportunities of the Republic of Albania on the implementation of the agreement on labour migration, entry requirements—including skill level—are determined on an ongoing basis by the Italian authorities in response to current labour market needs.

Figure 6: Half of the SMPs aim to engage younger individuals in some form.



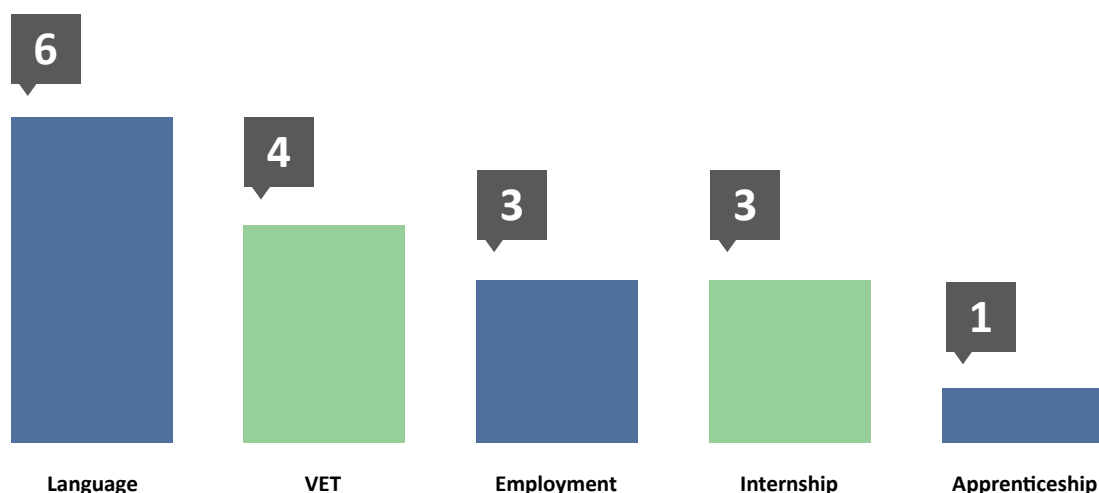
Half of the SMPs (7) identified in the Western Balkans target younger people in some way. This could be either through targeting current students (3) or recent graduates (2), or through targeting a certain age range (3), most commonly individuals between 18 and 30 or 35 years of age. There is an overlap, as some SMPs target for instance both current students and recent graduates or “youth”.

Figure 7: Out of the 14 SMPs, only 2 focus on the participation of underrepresented groups.



The YES project actively supports the inclusion of underrepresented communities, including women, people with disabilities, and vulnerable groups. The Cooperation Protocol to enhance labour mobility from Egypt to BiH prioritises support for women, youth, and people with disabilities. None of the mapped initiatives place a specific focus on individuals with protection concerns or other underrepresented groups. These findings are similar to the Link4Skills mapping, where a small share of SMPs targeted underrepresented groups (8 of 156 SMPs).

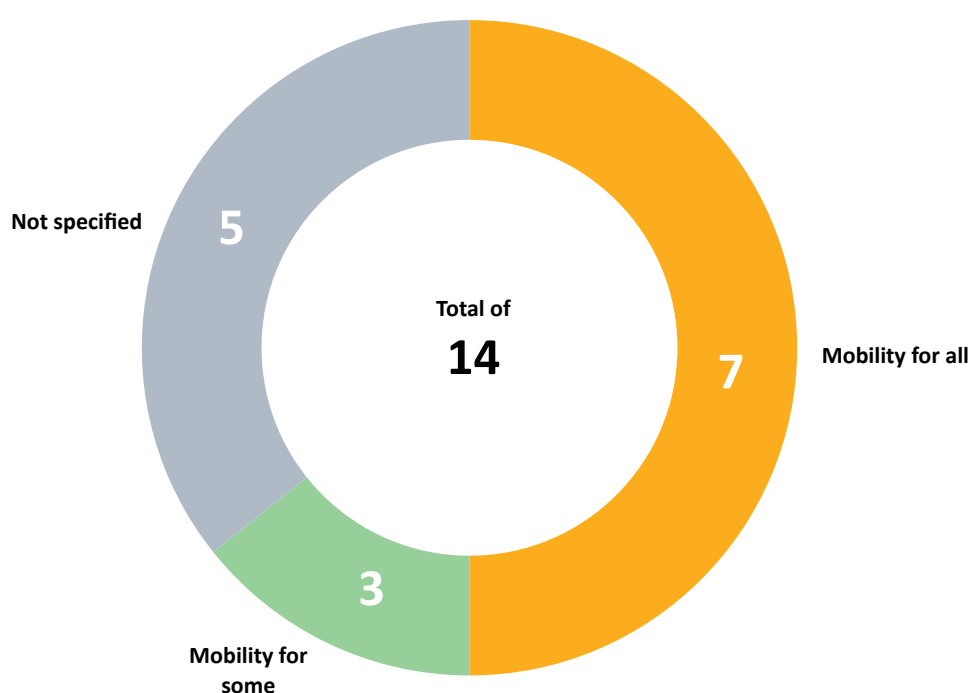
Figure 8: Nearly 2 in 3 SMPs offer on-the-job training as a skilling element.



SMPs adopt different types of skilling approaches. Some primarily provide training that enables individuals to practise the same occupation in another country, while others aim to more substantially expand the global skills pool. Skilling may take place in the country of origin, in the destination country, or in both. In the Link4Skills mapping, 80% of SMPs offered some type of on-the-job-training, such as employment placements (38%), vocational training (26%), internships (23%), apprenticeships (6%), and traineeships (4%). Other skilling components included language training, courses to support professional development, and specialised courses such as ICT training, driving training, or change management. Many SMPs also combined different types of skilling, such as a work placement and a language course.

The majority of the SMPs identified in the Western Balkans (9) offer some form of on-the-job training, such as vocational education and training (VET), job placements, internships, apprenticeships, or traineeships, and in some cases they provide more than one type of skilling. On-the-job training most often takes place in the destination country. Beyond on-the-job training, the most common skilling component is language training, which may take place in the origin, destination, or in some cases in both.

Figure 9. The majority of SMPs facilitate mobility for all participants (where this is specified).



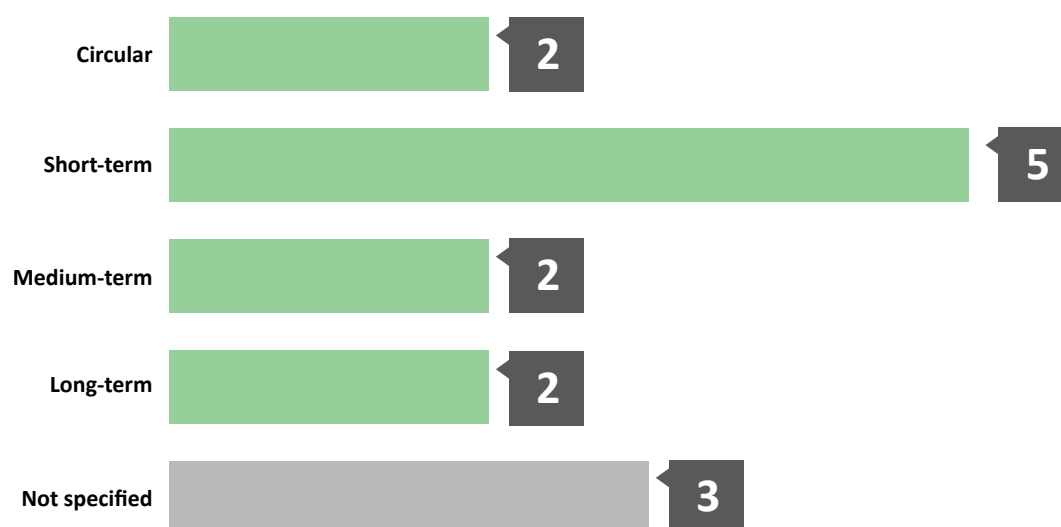
With the promotion of the Global Skill Partnership¹¹² and EU Talent Partnership¹¹³ approaches, SMPs combining “home” and “away” tracks have been becoming increasingly common in recent years as a strategy for generating mutual benefits by providing skilling both for those meant to move to a destination abroad for a certain period of time and those meant to remain in origin labour markets. The above figure indicates whether SMPs facilitate mobility for all participants or only for a subset of them. In the Western Balkans, half of the SMPs identified facilitate mobility for all participants, meaning that every individual participating in the initiative moves to the destination for a certain period. By contrast, mobility for a subset of participants, where all participants receive skilling in the origin but only some move (i.e. “home” and “away” tracks), is less common, with only two SMPs using the two-track model. For instance, the YES project provides vocational training in the origin;

¹¹² See: Home - Global Skill Partnerships

¹¹³ See: Talent Partnerships - Migration and Home Affairs - European Commission

after completing training in Kosovo* some participants move to Germany and start working there for a short work placement, while some stay in Kosovo*. Five of the SMPs do not specify the scope of mobility; four of these are an MoU or non-binding bilateral agreement. This is in line with the general trend seen in the broader mapping, where agreements are less likely to provide detail on the various SMP design elements. In the Link4Skills mapping, 60% facilitate mobility for all participants, and 15% do so for only some participants.

Figure 10. SMPs most frequently facilitate short-term mobility.



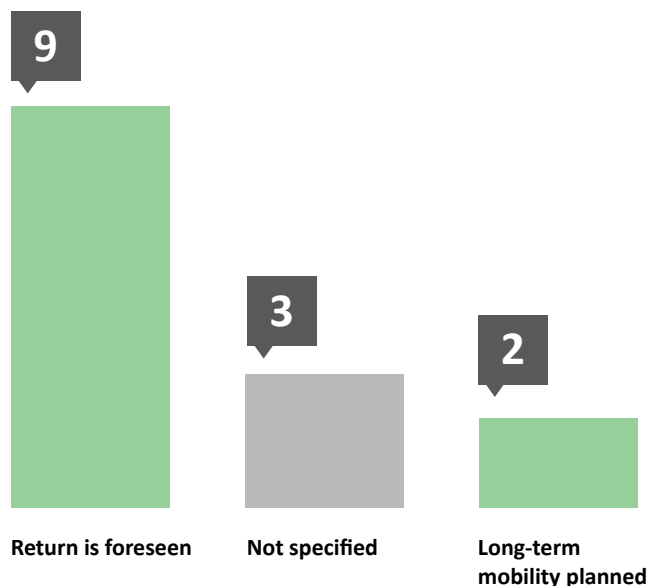
Note: Overlap exists, as SMPs may encompass more than one type of mobility.

Short-term mobility refers to periods of less than one-year; medium-term mobility encompasses to one to five years; and long-term mobility refers to movements of five years or longer, often intended to lead to permanent settlement and sometimes including a pathway to citizenship. In the Western Balkans, short-term mobility is the most common mobility duration (5). Circular-, medium-term, and long-term mobility are each used twice. Three of the collected SMPs do not indicate the length of mobility (these were non-binding agreements or MoU). In the Link4Skills project, short-term and medium-term mobility were the most common (81 times each), followed by long-term mobility (43) and circular mobility (22).

While these findings reflect the design of SMPs, actual mobility trajectories may differ in practice. For instance, individuals who are expected to return may instead transition to another status and remain in the destination, while those initially envisaged as long-term migrants may at some point decide to return. Such developments are not captured in this mapping, as they go beyond the data collected on the design of the partnerships.

114 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

Figure 11: Nearly 2 in 3 SMPs foresee the return of participants to the origin.

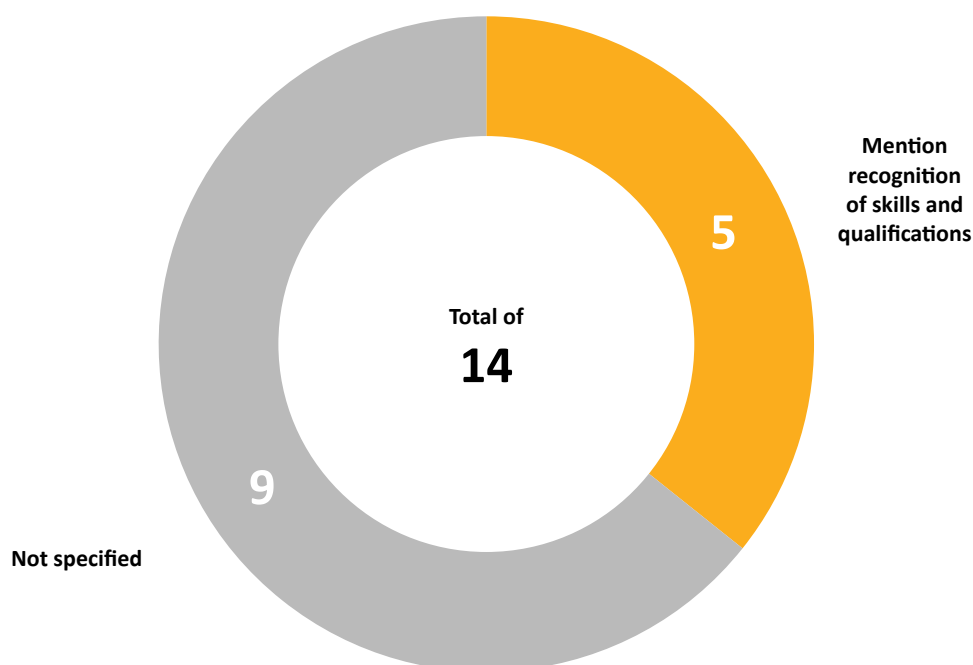


The above figure categorises the SMPs into three types of mobility designs found in the larger Link4Skills mapping exercise:

1. *Return foreseen*, meaning that participants ultimately are envisioned to return to the origin. For example, where short-term mobility is planned, one can assume that return is expected for participants. In some of these SMPs, return is explicitly noted.
2. *Long-term mobility planned*, where SMPs facilitate long-term mobility for all in the destination's labour market.
3. *Mixed mobility planned*, where SMPs facilitate long-term mobility for some in combination with short-term, medium-term, or circular mobility for others.

As seen in Figure 10, only 2 of 14 SMPs in the Western Balkans envision long-term mobility; in most cases, SMPs are designed for return to the origin (i.e. return to the Western Balkans in most cases). This trend is also generally aligned with the findings of the Link4Skills mapping, in which return was foreseen in 58% of SMPs. In the Link4Skills mapping, mixed mobility was planned in 13% of SMPs and long-term mobility planned 11% of SMPs. Notably, none of SMPs collected in the Western Balkan region planned for mixed mobility.

Figure 12: Roughly 1/3 of SMPs account for the recognition of skills and qualifications.



One key challenge many migrants face in the context of labour mobility and labour market integration is the recognition of their skills and qualifications.¹¹⁵ This validation and recognition is crucial to ensure that individuals can get a job in line with their existing experience in order to avoid deskilling and ensure sustainable labour market integration and thus talent retention.

Five of the 14 SMPs in the region specify the recognition of skills or qualifications in some form. However, it should be noted that of these five, three simply mention that participants will be required to complete the standard recognition procedure upon their arrival, and generally speaking there are frequent challenges with skills and qualifications recognition. One of the projects, Handwerk bietet Zukunft, supports participants with the recognition of their qualifications and offers adaptation training, where participants can learn skills missing for a full recognition of German vocational training. Another project, tQMP Bau Academy, uses a curriculum co-design strategy to create alignment, meaning that the Bau Academy offers a three-year apprenticeship in Pristina, according to the professional standards of the German vocational training system and at the same time the training is tailored to the labour market needs in Kosovo*. Both of these methods aim to ensure that participants can ideally put their qualifications to use in the destination and that the skills taught during the skilling element of the SMP. For partners in the region, this is a crucial element with regard to labour migrants arriving to the region: applying lessons from their own experiences in terms of

¹¹⁵ PSIMM Workshop 18-19/02/2026;

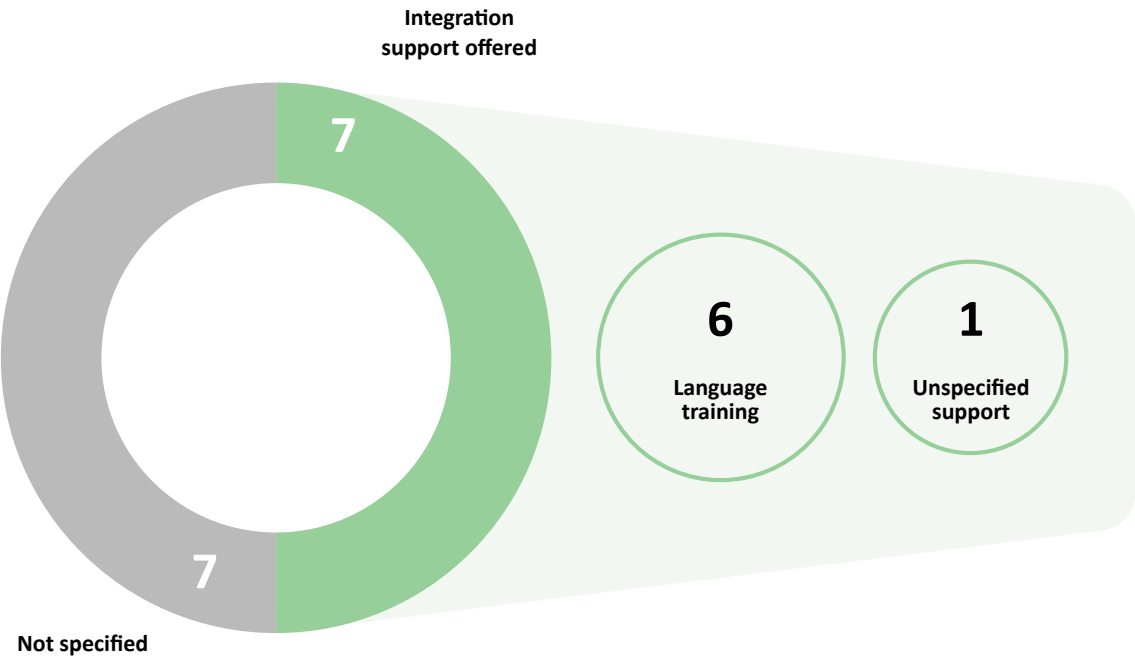
Katsiaficas, C. & Kessler, S. (forthcoming), "Skills Mobility Partnerships: Addressing global skills shortages more fairly?," In: ; OECD (2017). Making Integration Work: Assessment and Recognition of Foreign Qualifications. OECD Publishing, Paris. https://www.oecd.org/en/publications/2017/06/making-integration-work-assessment-and-recognition-of-foreign-qualifications_g1g7ca71.html.

¹¹⁶ * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

aligning qualification recognition and training systems, as a region of origin, as well as ensuring that these elements are systematically planned for in newly developed partnerships, could be points to consider for new SMPs.¹¹⁷

One of the projects, Handwerk bietet Zukunft, supports participants with the recognition of their qualifications and offers adaptation training, where participants can learn skills missing for a full recognition of German vocational training. Another project, tQMP Bau Academy, uses a curriculum co-design strategy to create alignment, meaning that the Bau Academy offers a three-year apprenticeship in Pristina, according to the professional standards of the German vocational training system and at the same time the training is tailored to the labour market needs in Kosovo*. Both of these methods aim to ensure that participants can ideally put their qualifications to use in the destination and that the skills taught during the skilling element of the SMP are recognised and useful in the origin and the destination. For partners in the region, this is a crucial element with regard to labour migrants arriving to the region: applying lessons from their own experiences in terms of aligning qualification recognition and training systems, as a region of origin, as well as ensuring that these elements are systematically planned for in newly developed partnerships, could be points to consider for new SMPs.¹¹⁸

Figure 13. Social integration is offered by half of SMPs, largely via language training.



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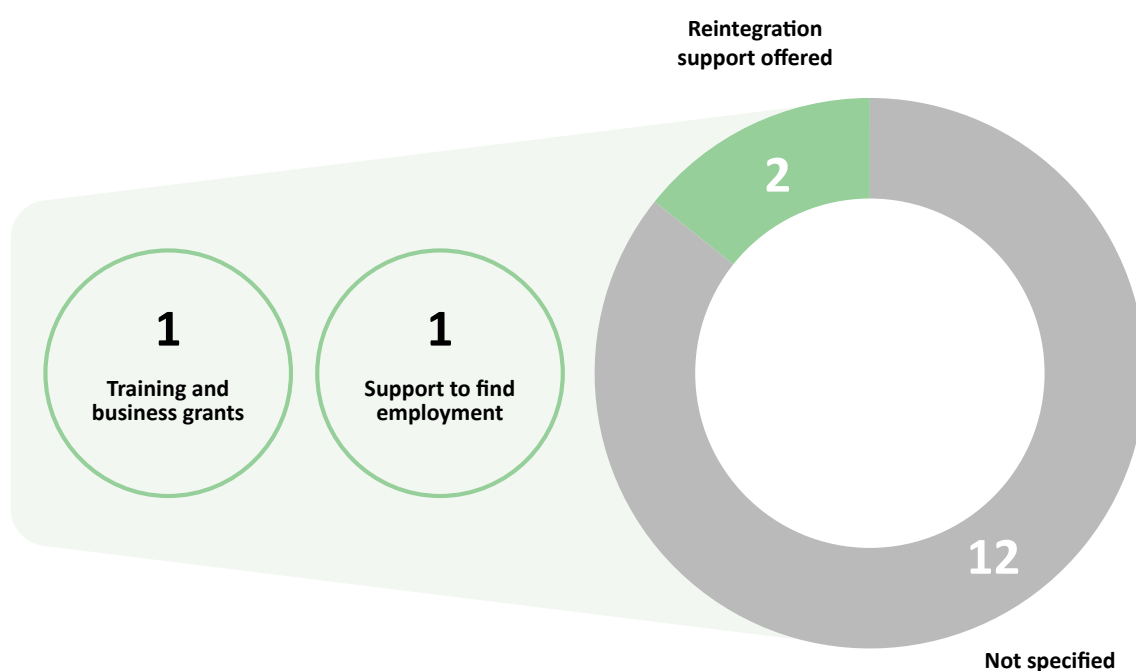
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Social integration support, aimed at assisting in the settlement process, can take many forms. Examples from the Link4Skills mapping include language instruction, cultural orientation activities, administrative support, and mentorship programmes. Such support becomes increasingly important with longer-term mobility; it is also connected to talent retention.¹¹⁹ In the Link4Skills mapping, social integration support was specified in 42% of SMPs, and most commonly took the form of language training.

Half of the SMPs in the Western Balkans specify some form of social integration support in their design. In most cases (6), this was a language course. One additional SMP stated that integration support was offered but did not further specify what this entails. These numbers refer to whether integration support was specifically mentioned as part of the SMP's design, as could be identified through desk research. Participants in SMPs where integration support was not specified might still have access to general integration services offered in the destination.

Since the Western Balkans was still mainly represented as a region of origin in this mapping, most of the social integration support took place outside of the region.

Figure 14: Reintegration support for (prospective) returnees is much less common, provided by just 2 of 14 SMPs.



119 Kessler, S. & Boukari, S. (forthcoming), Beyond recruitment: Why integration holds the key to talent retention, ICMPD Policy Insights blog.

Reintegration support refers to measures to help (prospective) returnees settle back into their origin; this could be offered before return (in the destination) or after return (in the origin). Examples from the Link4Skills mapping include job search support, financial support, alumni networks, CV and interview preparation, progression guidance, and reintegration opportunities at the former employer.

In the Western Balkans, even though return was foreseen by 64% of SMPs, only 2 SMPs (14%) specify some form of reintegration support for participants. In one case, this is support to find employment upon return, and in another, it is the opportunity to receive a training and business grant. Similarly, in the Link4Skills inventory reintegration support was only specified in 17% of SMPs. Thus, it can be said that as an origin, the Western Balkan region has experienced SMPs that facilitated mostly short-term mobility where the return of the participants was envisioned, but the partnership design did not include reintegration support. This experience could be an important lesson learned to feed into new partnerships the Western Balkans as it transitions to becoming a destination region.

v. Key takeaways on SMPs for the Western Balkans region

Looking ahead, what lessons can be drawn from the SMP mapping for Western Balkans partners as they move forward in concluding new partnerships while increasingly positioning themselves as a region of destination?

SMPs hold significant potential, including for addressing labour shortages and promoting skills development and youth exchange, while taking into account the priorities of both countries of origin and destination. Given the Western Balkans' traditional role as a region of origin, the region is uniquely positioned to draw on this experience when engaging in future partnerships as a destination region. Leveraging this perspective allows the Western Balkans to contribute to the development of successful and mutually beneficial SMPs that recognise and balance the needs and interests of both origin and destination countries.

Partnership models are flexible, underscoring their potential to respond to the specific needs of both countries of origin and destination. The findings demonstrate that, both generally and in the Western Balkans specifically, SMPs can take multiple forms (ranging from agreements to projects), target particular sectors (such as construction or healthcare), and adopt diverse approaches to skills development (from language learning to apprenticeships, delivered in either countries of origin or destination). They may also include elements to facilitate the recognition of qualifications and employ a variety of mobility designs that generate different forms of mutual benefit, including "home" and "away" tracks, mixed-mobility arrangements, and circular migration. Where partners are interested in engaging countries of origin from outside the region—for example, to improve qualification recognition, align training systems with Western Balkans standards, or address acute sectoral labour shortages—SMPs can provide a structured framework for negotiating approaches that are mutually beneficial from both origin and destination perspectives.

Among the SMPs mapped in the Western Balkans, there has been a clear focus on recruiting from the region to meet specific sectoral labour needs in destination countries, particularly in the construction sector. In the Western Balkans, the effects of international recruitment are strongly felt. Labour shortages—especially in construction and other key sectors—have frequently been linked to the scale of recruitment by EU destination countries. These experiences offer important lessons for

how the Western Balkans negotiates partnerships in its role as a recent region of origin, as well as for how it designs recruitment frameworks involving third countries outside Europe, whether through SMPs or other mechanisms. Moreover, in its partnerships with destination countries, the Western Balkans may consider the use of “home” and “away” tracks as a means of encouraging the retention of critical skills within the region.

Short-term mobility has been the predominant form of mobility facilitated by SMPs in the region, highlighting the importance of reintegration support. Although return is foreseen in the majority of partnerships, reintegration is not commonly incorporated into SMP design, either in the Western Balkans or in the broader *Link4Skills* mapping. This gap underscores the need for more systematic reintegration support for SMP participants returning to the Western Balkans, to enable individuals to effectively apply the skills acquired abroad within origin labour markets. Furthermore, as Western Balkans partners engage with countries of origin in new SMPs where return is envisaged, explicit consideration of reintegration measures will be an important element of partnership design.

Conversely, in light of longer-term labour market needs, Western Balkans partners may consider facilitating longer-term mobility options for migrants from outside the region, in which case social integration becomes particularly important. Providing integration support for SMP participants in a more systematic manner—whether delivered directly through SMPs or through referrals to broader integration services—can play a key role in supporting worker retention. While most existing integration measures focus primarily on language learning, Western Balkans partners may also wish to consider additional forms of social integration support, tailored to the specific national and local contexts.

Finally, future innovations in this area are not yet captured by the current mapping but should be considered by Western Balkans partners as they seek to conclude new SMPs with countries of origin In recent years, “home” and “away” tracks have become increasingly common as a means of ensuring that recruitment approaches contribute to building the global labour pool and strengthening sustainability. While this model is not yet widely used in the Western Balkans, it represents an approach that could be explored in the future.

In addition, recruitment from vulnerable populations remains uncommon, both in SMPs involving Western Balkans partners and in the broader *Link4Skills* mapping. However, given the Western Balkans’ geographic role along migration routes used by people seeking protection, the region may consider opportunities to re-skill or upskill these populations in line with labour market needs. While such initiatives may not necessarily take the form of SMPs, other actors could play a role in facilitating the identification and recognition of skills among migrants on the move, including individuals with protection claims.

Lastly, SMPs as a model allow for the involvement of multiple partners as both countries of origin and destination. Western Balkans partners could therefore consider jointly negotiating partnerships with one or more origin countries. Such partnership approach would be novel and could offer enhanced mutual benefits for all parties involved, including through shared approaches to skills development, language learning, the promotion of worker retention, and other complementary measure.

➔ Annex 4.1: SMPs Identified in the Western Balkans

SMP name	Origin	Destination	Partnership type	Start year	End year	Target sector(s) or occupation(s)	Mobility type ¹
Cooperation Protocol to enhance labour mobility	Egypt	Bosnia and Herzegovina	Cooperation Protocol	Signed 2025	Not specified	Not specified	Not specified
Craftsmanship offers a future (Handwerk bietet Zukunft)	Bosnia and Herzegovina	Germany (Koblenz, Potsdam, Munich)	Project	2020	2023	Electrical trade, metal construction and plant mechanics, heating and air conditioning technology	Long-term
Erasmus+ Traineeships	European Union, Norway, Iceland, Liechtenstein, North Macedonia, Türkiye, Serbia	European Union, Norway, Iceland, Liechtenstein, North Macedonia, Türkiye, Serbia	Programme	2014	Ongoing (with 6-year timeline - first phase: 2014-2020; second phase: 2021-2027)	Not specified	Short-term
Erasmus+ training courses	European Union, Norway, Iceland, Liechtenstein, North Macedonia, Türkiye, Serbia	European Union, Norway, Iceland, Liechtenstein, North Macedonia, Türkiye, Serbia	Project	2014	Ongoing (with 6-year timeline - first phase: 2014-2020; second phase: 2021-2027)	Open to all	Short-term

SMP name	Origin	Destination	Partnership type	Start year	End year	Target sector(s) or occupation(s)	Mobility type ¹
European Solidarity Corps	European Union, Iceland, North Macedonia, Türkiye, Liechtenstein; partner countries neighbouring the EU: Albania, Algeria, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Egypt, Georgia, Israel, Jordan, Kosovo*, Lebanon, Libya, Moldova, Montenegro, Morocco, Norway, State of Palestine, Russia, Serbia, Syria, Tunisia, Ukraine	European Union, Iceland, North Macedonia, Türkiye, Liechtenstein; partner countries neighbouring the EU: Albania, Algeria, Armenia, Azerbaijan, Belarus, Bosnia and Herzegovina, Egypt, Georgia, Israel, Jordan, Kosovo ^{120*} , Lebanon, Libya, Moldova, Montenegro, Morocco, Norway, State of Palestine, Russia, Serbia, Syria, Tunisia, Ukraine	Project	2016	Ongoing	Not specified	Short-term
Joint Declaration of Intent between the Federal Ministry of Health of the Federal Republic of Germany and the Ministry of Health of the from Kosovo*	Germany, Kosovo*	Germany, Kosovo*	Declaration of intent	2019	Not specified	Health and care	“Exchange”
Memorandum of understanding between the Ministry of Labour and Social Policies of the Italian Republic and the Ministry of Labour, Social Affairs and Equal Opportunities of the Republic of Albania concerning the Implementation of the Agreement on labour migration signed on 2nd December 2008	Albania	Italy	Memorandum of understanding	2009	Not specified	Not specified	Circular, should be encouraged
Memorandum of understanding for the establishment of a bilateral skills and mobility partnership	Kosovo*	Germany	Memorandum of understanding	2016	Not specified	Construction	Not specified
Professional Qualification for Future Specialists and Managers for North Macedonia	North Macedonia	Germany	Project	2021	2022	Not specified	Short-term

120 * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

SMP name	Origin	Destination	Partner-ship type	Start year	End year	Target sector(s) or occupation(s)	Mobility type ¹
Sustainable recruitment of nurses from foreign countries for employment in Germany (Triple Win Nurses)	Bosnia and Herzegovina, India (Kerala and Telangana), Indonesia, Jordan, Philippines, Tunisia	Germany	Project	2013	Not specified	Healthcare	Long-term
tQMP Bau Academy	Kosovo ^{121*}	Germany	Project	2018	2021	Construction	Medium-term
Vocational Training Partnership: LBB Initiative	Kosovo*	Germany	Project	2017	Not specified	Construction	Circular mobility
Young Professional System	Algeria, Argentina, Benin, Canada, Cape Verde, Congo, Gabon, Georgia, Morocco, Mauritius, Montenegro, New Zealand, Russia, Senegal, Serbia, Tunisia, United States	France	Programme	2013	Ongoing	Open to all; in New Zealand there is a focus on agriculture	Medium-term
Youth, Employment and Skills in Kosovo* (YES)	Kosovo	Germany	Project	2017	2021	Construction	Short-term

¹²¹ * This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

➔ Annex 4.2: Inventory Data Collection Points

- Partnership **name** is listed (in English).
- **Origin** and **destination** are specified, with subnational places of origin and destination highlighted where relevant.
- **Partnership type** refers to the formal arrangement underpinning the cooperation between partners, which can take several forms.
 - ▶ Formal agreements, such as bilateral agreements, are binding arrangements between two or more states or organisations.
 - ▶ Non-binding agreements, including MoUs or memoranda of cooperation, are less legally binding; however, they outline shared intentions and frameworks for future collaboration between the signatories.
 - ▶ Projects are more specific and often more time-bound initiatives designed to achieve a specific goal, including pilots.
 - ▶ Finally, the “other” category encompasses a range of arrangements, such as scholarship agreements and recruitment agreements, which support cooperation between signatories in a targeted and specified way.
- The **start year** and **end year** are marked, along with other relevant information such as the planned end date for ongoing initiatives or automatic renewal, when relevant.
- **Target sector(s) or profession(s)** refers to the main labour market area(s) of focus of the partnership, where this is specified. Some SMPs are explicitly open to participants from all professional backgrounds, while others specify a certain field or occupation, and yet others do not specify a focus.
- **Main stakeholders** outlines who leads, manages, and/or implements the partnership, including the signatories of agreements.
- **Funding** indicates who finances the initiatives, whether this is a specific entity, a stakeholder type, and/or co-financed.
- **Number of participants** records how many people were either planned to participate, or actually participated, in the partnership. Depending on the data available, this figure can refer either to the number of individuals named (e.g. capped participation) or targeted in the agreement regarding skilling and/or mobility, or to the number who have actually taken part in the SMP over a given period (for a particular year, cumulative, etc.).
- Where applicable, the inventory notes whether the SMP aims to **target underrepresented populations** such as women, persons with disabilities, particular minority groups, or persons in need of international protection.
- **Mobility type** describes the intended duration and scope of mobility planned under the SMP, including details where available.
 - ▶ Short-term mobility refers to mobility lasting less than 1 year.
 - ▶ Medium-term mobility refers to mobility lasting from 1 year up to 5 years.
 - ▶ Long-term mobility is 5 years or longer, often intended to lead to permanent settlement and sometimes including a pathway to citizenship.
 - ▶ Circular mobility refers to repeated movements between countries, where participants return and move again as part of a structured cycle, often short-term in temporality.

The inventory indicates whether an SMP provides **mobility opportunities for some or all** participants to another country. For example, some SMPs plan skilling for a certain number of participants in a country of origin but plan mobility only for a smaller subset of them.

- The inventory marks which **type of mobility design** each SMP uses, based on three approaches identified by the researchers across the mapped SMPs:
 1. mixed mobility planned;
 2. return foreseen; and
 3. long-term mobility planned.
- **Participant eligibility requirements** details whether the SMP targets a particular group, for instance related to career stage, occupation, or skill level. Eligibility requirements in the collected initiatives vary widely, from specific preconditions to have experience in a particular sector to broader classifications based on skill levels. To simplify this diversity of data, the requirements were categorised in three main sub-categories:
 4. career stage (e.g. current student or recent graduate);
 5. occupation (e.g. currently working in a certain field or profession); and
 6. skill level as defined in the SMP agreement (e.g. high, medium, or low where this could be determined, or the specific language of the SMP if this did not align with the team's high/medium/low classification, e.g. "skilled talent").

Where additional criteria are explicitly stated in SMP documents, for instance relating to language proficiency or the lack of a criminal record, these are also included.

- **Training type and location** summarises what kind of skills development is offered, such as on-the-job training including work placements, vocational training, and internships, as well as other skilling components such as language courses, professional development, and specialised training. The location is also mentioned where this information is available (i.e. in the origin or destination).
- **Recognition of qualifications and skills** outlines whether and how participants' qualifications are recognised (if specified). Some SMPs do not mention the recognition of skills and qualifications or specify how this is to be dealt with.
- Social **integration support** covers settlement assistance offered to participants, such as language instruction or cultural orientation activities, which may be offered pre-departure or post-arrival. This was not always specified.
- **Reintegration support** refers to measures to help (prospective) returnees settle back into their home country, which may be offered before or after return. This was not always specified.
- **Evaluation** lists publicly available evaluations and assessments, where applicable.
- **For more information** lists the information sources used for each SMP.

➔ **Annex 4.3: Limitations**

While the inventory offers a robust evidence base, certain limitations must be acknowledged. First, the inventory is limited to government-to-government partnerships. Although some of these include private sector or civil society actors, the mapping does not include SMPs in which there is only a government partner on one side. This scope was chosen to focus on the role of government-to-government partnerships as an interesting point of analysis and contribution to the research base. Second, the mapping concentrated on initiatives with a clear and structured practical skilling element. For this reason, while study-related internship programmes were included, the inventory does not cover SMPs that only include academic university study, such as student exchanges or scholarship programmes. Third, the inventory focused on partnership design; fewer data points are focused on outcomes and impact. This was purposeful in the research design due to the limited information typically available on SMPs via desk research, in particular public evaluations, as well as the understanding that broader success factors may not always be captured by evaluations or specific metrics (e.g. participation numbers). Finally, the depth of information available varies considerably across initiatives. Detailed data on design, implementation, and outcomes are often particularly scarce for high-level agreements and for newer initiatives that have not yet undergone evaluation (or where the evaluation is not publicly available).

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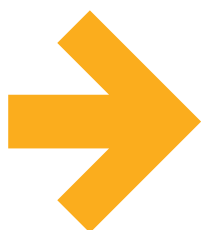
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Between Emigration and Attraction: Governance, Gaps, and EU Convergence
International Centre for Migration Policy Development, 2026

The Western Balkans occupies a unique position in the European labour migration landscape: while nearly a quarter of the region's population lives abroad, local economies are increasingly dependent on foreign workers to address growing labour shortages. As recruitment expands beyond neighbouring countries to workers from Asia and other regions, migration governance systems are facing mounting pressure to adapt.

This report examines the legal, institutional, and operational frameworks governing labour migration across the Western Balkans, with particular attention to the role of private employment agencies and migration management.



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