



WORK-BASED LEARNING PRACTICES IN THE CONTEXT OF ACTIVE LABOUR MARKET POLICIES IN THE WESTERN BALKANS

**A cross country assessment per EU quality
assurance standards**

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¹ This designation, applied without prejudice to positions on status, is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence. All further references to 'Kosovo' in this report are to be understood as subject to this footnote.

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EXECUTIVE SUMMARY

Work-based learning (WBL) is a priority in the European Union, where it is seen as a key instrument for strengthening employability and skills. This report presents a comparative analysis of WBL in active labour-market policies (ALMPs) for the Western Balkans. Because it equips unemployed people and disadvantaged groups to gain practical knowledge, skills, and competencies that are essential for integration into the labour market, WBL forms a central instrument in ALMPs.

Assessing WBL in ALMPs across six Western Balkan countries – Albania, Bosnia and Herzegovina (BiH), Kosovo, North Macedonia, Montenegro, and Serbia – the analysis here draws on national reports prepared by local experts under ETF co-ordination, combining desk research with stakeholder interviews. Benchmarking national practices via the European Quality Framework for Traineeships and the related EU and ILO standards, the project mapped the evidence against EU quality criteria for such elements as written agreements, learning objectives, supervision, work conditions, compensation, programme duration, recognition, transparency, and monitoring.

The findings point to solid shared progress:

- All six countries formalise WBL through written contracts or other agreements outlining the rights and obligations of trainees, employers, and providers of employment services.
- Though unevenly applied, learning objectives and training plans are evident in several programmes, among them Kosovo's individual training plans, North Macedonia's 'training for occupations in high demand', required components of training and mentorship programmes in ALMP-supported internships implemented under either the Serbian Federal Employment Institute's 'Training and Work with a Known Employer' or the Republika Srpska Employment Institute, and some programmes in Bosnia and Herzegovina.
- There is widespread provision of health and accident insurance, alongside pension contributions and holiday entitlements in some cases.
- Compensation mechanisms exist in most programmes, though considerable variation in their level and conditions reduces predictability for participants.
- Programme durations broadly align with EU guidance, at three to six months, with exceptions seen in some longer programmes: BiH's involving ALMP-supported internships and Serbia's.
- Recognition is uneven but present: Montenegro and North Macedonia link some training directly to qualifications; in Serbia and BiH, attestations and certificates are issued.
- Transparency and programme information feature in most countries' implementations, especially in Montenegro and Serbia.

Challenges nevertheless remain:

- Learning objectives are not systematically defined or supervised. This restricts the learning dimension of internships and traineeships.
- Recognition of outcomes is quite limited in Albania and Kosovo, where certificates often lack full-fledged qualification value even when explicitly intended to have such value.
- Compensation practices prove inconsistent, showing disparities between sectors and across programmes.
- Monitoring and evaluation mechanisms remain fragmented, with participant self-evaluation and tracer studies being particularly rare.

Several possible ways forward stand out:

- Strengthening ALMP-related WBL's pedagogical component could help ensure systematic application of objectives, supervision, and mentoring.
- Such mechanisms as certification and recognition of skills, competencies, etc. acquired via work-based learning opportunities could expand the recognition and validation of outcomes.
- Clearer, fairer compensation and cost-sharing mechanisms serve to safeguard equity and attract employer participation.
- Systematic self-assessment, follow-up, and tracer studies should improve monitoring and evaluation.
- Developing region-wide co-operation on employer engagement, financing, and mobility contributes to aligning with EU priorities and fostering socio-economic convergence.

In sum, while WBL in ALMPs is firmly in place across the region, its potential remains only partly realised. Further alignment with EU standards would strengthen employability-linked outcomes, increase fairness, and enhance the contribution of ALMPs to inclusive labour-market integration.

1. INTRODUCTION

1.1 Scope and objectives of the study

This cross-country analysis assesses how work-based learning (WBL) integrated into active labour market measures (ALMPs) is designed and implemented in Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro and Serbia, using EU quality standards as a benchmark. The analysis aims to identify achievements, gaps, and areas for improvement in ensuring that WBL within ALMPs delivers tangible benefits for both jobseekers and employers.

All six of these EU-candidate or potential-candidate countries face the two-horned challenge of modernising their labour market and education system while progressively synchronising with EU quality standards. In this region, WBL within ALMPs holds particular significance: persistent labour-market challenges – high youth unemployment, large ‘not in education, employment, or training’ (NEET) populations, and skills mismatches and shortages alike – hamper smooth school-to-work and work-to-work transitions. In such environments especially, ALMPs provide an important channel to deliver targeted WBL opportunities to vulnerable groups, supporting both individuals’ employability and broader socio-economic convergence with EU norms.

This cross-country comparative report (hereafter ‘the Report’) is intended for a broad, variety-rich readership, reflecting the cross-cutting relevance of WBL in ALMPs. Its analysis could strongly inform the policy efforts of national governments and ministries responsible for training, occupational-skills development, labour-market preparation, employment efforts, and economic development. It also supports Western Balkan co-operation bodies’, other regional organisations’, and EU institutions’ work toward national reforms that dovetail with EU quality standards while also advancing the region’s integration. For concrete operations meanwhile, the findings hold special utility for public employment service (PES) practitioners, employment and training providers implementing ALMP measures, and employers providing traineeship or on-the-job training (OJT). Civic organisations and other social partners’ efforts to safeguard learner rights and promote inclusion could benefit likewise from them, while researchers and academics may draw on the Report’s comparative evidence for further analysis in the fields of labour-market policy, vocational education and training (VET), and regional development.

The analysis conducted drew from six national reports for the ETF that assess the state of WBL against the backdrop of EU quality standards. Its scope is limited to ALMPs and assessing the associated WBL per those quality standards, from the above-mentioned traineeship framework (presented in Table 1.1). Work-based learning in the context of initial and continuous vocational education and training (IVET/CVET) is addressed elsewhere (ETF, 2026).

The assessment is organised into three sections. To provide the necessary background, 1.

INTRODUCTION outlines the conceptual foundations, while 2. Methodology describes the methodology. 3. Analysis forms the core of the report, providing an overview of the Western Balkans region in relation to the key variables examined and analysing work-based learning (WBL) against EU quality standards relevant to active labour market policies (ALMPs). It also offers food for thought through a deeper reflection on key issues and critical enabling factors.

1.2 Work-based learning as a central tool for active labour-market policies

Work-based learning plays a pivotal role for the European Union labour market and employment strategies, particularly in connection with active labour-market policies. Actual work environments form the heart of WBL in ALMPs, defined broadly as all forms of learning set in these environments. Hence, it covers traineeship, internship, and structured on-the-job training arrangements linked to employability measures while excluding learning in simulated settings that lack essential workplace dynamics (such as their customer interaction, day-to-day problem-solving, and social relations). For instance, a hotel or restaurant at a training centre might supply learners with WBL if they get exposed to real customers there.

Rather than being primarily embedded in initial- or continuing-education systems, the WBL in this context is integral to targeted labour-market interventions aimed at reducing unemployment, preventing exclusion from the labour market, and supporting reintegration of disadvantaged groups. Via this WBL, public employment services, donor agencies, and employers equip jobseekers and other vulnerable individuals with practical experience and transversal knowledge, skills, and competencies that aid in rapidly entering or re-joining the labour market.

At EU level, the European Commission and the ETF promote the WBL mechanism for its highly effective reduction of skills mismatches, enhancement to employability, and support for social inclusion. A flagship form of WBL within ALMPs, traineeship offers participants – often young people who face issues in entering the labour market, the long-term unemployed, or NEETs – with a stepping-stone to employment. Structured OJT is another widely used support tool applied by labour-market policy for reskilling and upskilling in response to work or market transformation.

Benefits from WBL in ALMPs accrue to all stakeholders: jobseekers gain employability and work experience; employers access motivated applicants and can assess potential recruits' suitability via some form of trial period; and societies benefit from lower unemployment, greater social cohesion, and richer human capital.

1.3 Quality criteria for work-based learning in ALMPs

Given the vulnerability of the learners in ALMPs, quality assurance is crucial to preventing misuse of traineeship and to ensuring that the WBL leads to genuine development of knowledge, skills, and competence rather than, for instance, to undercutting of regular employment. Under the WBL umbrella, two policy frameworks hold particular relevance here, therefore providing a benchmark for designing and evaluating WBL in general:

1. **The Council Recommendation on a Quality Framework for Traineeships (2014)** constitutes the cornerstone of quality assurance for WBL opportunities, including those implemented within ALMP portfolios. It sets out minimum standards for written agreements and definitions for learning objectives, supervision, fair work conditions, reasonable duration, recognition of outcomes, and transparency (Table 1.1 provides details).
2. While **the European Framework for Quality and Effective Apprenticeships (2018)** is linked more closely to IVET, it features some provisions that are relevant for ALMP traineeship linked to dual training or retraining programmes – for instance, terms for written agreements, social partners' involvement, and quality-assurance mechanisms (see Annex 1: Detailed Criteria of the European Framework for Quality and Effective Apprenticeships (2018) for details).

Only the criteria established in the 2014 recommendation, all of which are reproduced in the table below, directly informed this report.

Table 1.1: The criteria as detailed in the Council Recommendation on a Quality Framework for Traineeships (2014)

Criterion	Explanation
1. Written traineeship agreement	- Require that all traineeships are based on a written agreement concluded at the beginning between trainee and provider. - Agreement must indicate: educational objectives, working conditions, allowance/compensation (if any), rights and obligations under EU/national law, and the duration.
2. Learning and training objectives	- Promote best practices in defining learning objectives so that trainees acquire practical experience and relevant skills. - Tasks must be linked to these objectives. - Encourage providers to designate a supervisor to guide and monitor the trainee's progress.
3. Working conditions	- Ensure trainees' rights under EU/national law: working time limits, rest periods, minimum holidays. - Clarify health and accident insurance and sick leave coverage. - Require that agreements specify if compensation is provided, and its amount.
4. Rights and obligations	Agreements should clearly define the rights and duties of both parties, including confidentiality and intellectual property rights.
5. Reasonable duration	- Duration should not exceed six months in principle, unless longer is justified. - Clarify conditions for extension or renewal. - Specify that either party may terminate the agreement in writing with reasonable notice.
6. Recognition of traineeships	- Promote recognition and validation of knowledge, skills and competences acquired. - Encourage providers to attest learning outcomes through a certificate.
7. Transparency requirements	- Vacancy notices should specify terms and conditions, allowance, insurance coverage, and recruitment policies (e.g., share of trainees hired). - Career guidance and employment services should also apply these transparency standards.
8. Cross-border traineeships	- Facilitate cross-border mobility by clarifying legal frameworks, reducing administrative barriers, and supporting portability of rights. - Explore use of the EURES portal to share information on paid traineeships.
9. Use of EU Funds	Mobilise ESF, ERDF and Youth Employment Initiative funds to increase number and quality of traineeships, including allowances and complementary training.
10. Applying the Framework	- Member States should apply the framework promptly and report measures taken to the Commission. - Actively involve social partners in implementation, including through model agreements. - Promote involvement of employment services, education and training institutions in applying the framework.
11. Commission commitments ²	- Monitor application of the framework with Member States. - Report on progress based on information provided by Member States. - Promote cooperation, exchange of practices, and support Member States in using EU funds.

Source: OJEU (C88/2014)

² Obligations exclusive to EU members and therefore not applicable to the Western Balkans' candidate or potential-candidate countries.

In March 2024, the European Commission issued two follow-up proposals:

- A proposal for a Directive on improving and enforcing working conditions for trainees and combatting regular employment relationships disguised as traineeships ('Traineeships Directive')³.
- A proposal for a Council Recommendation on a reinforced Quality Framework for Traineeships⁴.

The European Commission is leading the associated initiative. The second proposal is now under discussion in the Council of the EU and the European Parliament, which endorsed a mandate for negotiations with the Member States in October 2025⁵.

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52024PC0132>

⁴ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=comnat:COM_2024_0133_FIN

⁵ <https://www.europarl.europa.eu/news/en/press-room/20251003IPR30723/parliament-ready-to-negotiate-better-working-conditions-for-trainees>

2. METHODOLOGY

2.1 Methods

This Report is predominantly based on the information included in the national country reports (ETF, 2024a-e). In addition, recent consultations with national experts have been conducted to provide the latest updates in the field, when feasible.

As a result, **desk research** represented the baseline of the country reports. Authors systematically reviewed national legal frameworks, laws and bylaws on labour-market measures, strategies, action plans, statistical data from official agencies, and policy documents. They also examined catalogues of ALMP measures, eligibility rules, financing programmes, employment-service websites, and relevant studies and reports (from ministries, chambers of commerce, donor projects, and international organisations). Where available, qualitative information from online databases and open-data portals enriched the picture of participation in ALMPs, programme duration, target groups, and outcomes.

The **stakeholder interviews** conducted to complement the desk-research component captured qualitative insight. Among the typical interviewees were representatives of ministries of labour and finance, public employment services, qualification authorities, training providers contracted under ALMPs, employer associations, and (in certain cases) social-partner organisations or donor-funded projects. While informant numbers varied, all reports spotlight the value of this dialogue for filling information gaps, particularly where some programme information was not publicly accessible. Bosnia and Herzegovina presented an additional challenge, related to limited availability of disaggregated data (key information was not consistently distinguishable within ALMP datasets). For further triangulation, later discussions validated the national reports' findings via meetings, in person or online, to which national stakeholders were invited to contribute. Also, stakeholders were given time to provide written feedback on the overall conclusions. Finally, all findings were reviewed jointly with ETF experts and the authors of the country reports for quality assurance. These peer-review steps along the way helped correct inconsistencies, harmonise terms and concepts, and confirm the conclusions' accuracy.

The **analytical framework** is rooted in the EU quality standards most relevant for WBL under ALMPs, particularly the above-mentioned European Quality Framework for Traineeships (EQFT). That instrument supplied the structure for examining the evidence and assessing practices, through criteria covering written agreements, clarity of learning objectives, supervision and mentoring, pay/allowances, social protection, health and safety, transparency, and recognition of outcomes. Mapping national findings to EU quality standards thus enabled identifying achievements and gaps in a consistent manner.

Together, the backbone of EU criteria and our two-pronged method, combining document analysis with stakeholders' validation, let each country report contribute to a coherent overview of WBL measures implemented under ALMPs, benchmark practices against European standards, and present a picture of strengths and challenges that supports both comparability and actionability for labour-market policy.

Thanks to respectful structured analysis of the inputs, this cross-country synthesis maintains the integrity of each country's evidence yet is comparative in essence, presenting regional patterns, common challenges, and opportunities for policy alignment in the area of WBL under ALMPs.

2.2 Clarification of core concepts

The notion of work-based learning in the ALMP context deserves further elaboration. Generally understood as encompassing all forms of organised learning that take place in actual work environments or are directly structured around work tasks and processes, provided that these are not confined to pure simulation, it has been further specified as referring to

“all forms of learning that occur in a real work environment. It equips individuals with the skills necessary to obtain, maintain and advance in their jobs and professional development. Common types of work-based learning include apprenticeships, internships, traineeships and on-the-job training. These often, but not always, combine workplace learning with classroom-based education” (IAG, 2024).

Active labour-market policies, in turn, are public interventions that provide training, work experience, or employment incentives for people having difficulties in entering, or remaining in, the labour market. The Interagency Group has provided the following detailed definition for WBL in this setting:

“It is not primarily a pedagogical approach integrated into education and training, but rather a labour-market instrument designed to equip jobseekers and disadvantaged groups with employable knowledge, skills and competencies. Within ALMPs, WBL is a targeted intervention bridging unemployment or economic inactivity and the labour market, often as part of activation, reintegration, or skills-matching measures”.

The concept was deliberately left broad because exposure to real work environments under ALMPs can take many forms. For example, traineeships are typically short spans of practical work experience offered to unemployed or inexperienced individuals; internships, often linked to higher education, are increasingly supported by the PES as an entry-to-employment measure; and structured on-the-job training forms a part of many reskilling or upskilling programmes for unemployed adults.

From this perspective, WBL in ALMPs is not simply ‘learning by doing’. Neither is it informal work experience. It is a structured intervention of a temporary and purposeful nature that follows well-defined objectives. Involving the PES, employers, and learners, it is subject to quality criteria that safeguard all parties, addressing both the learning process and work conditions. This internationally informed understanding provides foundations for assessing WBL in ALMPs against EU standards.

Across all six Western Balkan countries, WBL in ALMPs is consistently understood as real-world work learning linked to employability. Table 2.1, compiled on the national reports’ basis, outlines its country-specific facets. Albania and North Macedonia stress broad-based work experience for unemployed individuals, while Kosovo narrows the definition to traineeships and internships facilitated by the PES. Montenegro highlights structured training with employers, while Serbia institutionalises traineeship and OJT activities as core ALMP measures. Finally, WBL under Bosnia and Herzegovina’s ALMPs is more strongly employment-oriented, with the learning component often weakly articulated. Despite these variations, all six countries recognise WBL in ALMPs as a crucial tool for facilitating labour-market entry, especially for young and unemployed populations.

Table 2.1: Understandings of WBL under ALMPs in the Western Balkan countries

Country	Understating of WBL in ALMP settings
Albania	The learning, in a real work environment, is designed to equip unemployed individuals with skills to enter, retain, or progress in employment. It is linked to activation programmes co-ordinated by the Ministry of Finance and Economy and supported by the PES (Albania's National Employment Service).
Bosnia and Herzegovina	Workplace-based learning is linked to two types of internship, understood as entry-level forms of employment (anchored in labour law and related regulations), and to various forms of on-the-job training. Within the country's complex, multi-level governance landscape, responsibility for defining and implementing the associated measures lies with the competent public employment institutes and services, each operating in co-ordination with its respective stakeholders.
Kosovo	The WBL is implemented primarily through trainee and intern positions offered to unemployed persons, especially young people and new graduates. These are designed as short-term provision of work experience that complements formal learning but in this case serves also as employability-aimed measures facilitated by the national PES (the Employment Agency).
North Macedonia	North Macedonia defines WBL as practical learning through real work, paid or unpaid, that enables unemployed people to gain initial work experience. It covers company-based placements organised with the support of the relevant PES (the Employment Service Agency), often in the form of 'practice' programmes for young jobseekers.
Montenegro	The learning is associated with training programmes organised in co-operation with employers, wherein learners gain competencies in actual workplaces. The national PES, the Employment Agency, implements WBL measures either as company-based training or as combined programmes (this depends on the employer involvement and programme design).
Serbia	In Serbia, 'WBL' refers mainly to traineeship and OJT programmes supported by the PES (the National Employment Service). The placements, intended to give unemployed individuals an opportunity to acquire practical skills with employers, are frequently linked to measures aimed at young people and first-time jobseekers.

Source: ETF National Reports

3. ANALYSIS

3.1 The Western Balkans context

This section outlines the main characteristics of the six Western Balkan countries under review. Each country profile provides a concise overview of the respective socio-economic, demographic, employment, and education context.

3.1.1 Albania

In 2023, Albania had a total population of just over 2.7 million. That year's NEET rate for young people, aged 15–29, stood at 25%. This fell to 22.2% in the following year. The 2024 employment rate for individuals aged 15+ was 58.2%, with employment of young people remaining significantly lower, at 43.4%. The youth unemployment rate, at 19.1%, was more than double the overall unemployment rate, 8.5% (ETF, 2026a; INSTAT, 2026). Also, while the general working-age population's participation in the labour force came to 76.2% in 2024, women showed substantially lower participation, per World Bank open data (2026).

Participation in adult learning (formal or non-formal) is extremely low, at just 1.7% in 2024 for the 25–64 age band (ETF, 2026a). The 2022 Programme for International Student Assessment (PISA) results further highlight education challenges, with scores significantly below the OECD average for mathematics (368 vs. 472), reading (358 vs. 476), and science (376 vs. 485). Furthermore, the figures manifested a decline from 2018 levels in all three domains (OECD, 2023a).

3.1.2 Bosnia and Herzegovina

The labour force of Bosnia and Herzegovina, which had an estimated total population of 3.21 million in 2023 (ETF, 2024), is shrinking, through demographic change due to sustained emigration and declining fertility. Notwithstanding strong growth in gross domestic product (GDP) terms between 2020 and 2022, economic growth slowed to 1.9% by 2023. Labour-market participation remains modest, with an employment rate of 42.9% and a high inactivity rate: 50.9%, according to the nation's 2024 Labour Force Survey (LFS) (ETF, 2026e).

Against this backdrop, TVET plays a significant role, with 76.8% of secondary-education students enrolled (57.2% in four-year technical programmes and 19.6% in three-year vocational programmes). The labour market is characterised by persistent skills mismatches and increasing labour shortages (driven by the worker outflows mentioned above) only partially offset by foreign-labour inflows (European Commission 2024 remarks cited by the ETF, 2026e).

Employers show relatively stable willingness to hire young people without prior work experience (65–69% have stated this in recent years). This points to continued demand for entry-level labour – and to the importance of ALMPs. The NEET rate declined from 21.4% in 2021 to 13.7% in 2025, per LFS estimates referring to the 15–24 age group (ETF, 2026e).

Education outcomes remain a concern, with students performing below OECD averages in PISA assessments. Despite relatively high education expenditure, inefficiencies persist, largely on account of the country's complex governance structure (Guthrie, C. et al., 2022; ETF, 2024 in ETF, 2026e).

3.1.3 Kosovo

Kosovo has Europe's youngest population, with nearly half of its 1.6 million inhabitants under the age of 25 as of 2024 and only around 10% over 65, while the EU-27 average for the latter stands at 22% (World Bank, 2026). Moreover, Kosovo's labour market remains fragile. The labour-force participation rate for those aged 15+ was only 43.2% in 2024. People aged 15–24 face particularly low integration into the labour market, with only 19.4% employed (the EU average is 35%). While the country's unemployment rate for those aged 15+ stood at 10.9% in 2024, youth unemployment was higher, amounting to 19.5% of people aged 15–24, although it has shown a continuous decline – for instance, from 57.7% in 2015 to 17.3% in 2023 (ETF, 2026b). The NEET rate for those 15–24 comes to 30% (World Bank, 2026), and the corresponding figure for the 15–29 age group is 31.4% (ETF, 2026b).

Emigration's major role in shaping Kosovo's demographic and labour trends is clear: around every third member of the population lives abroad (World Bank, 2024). Education outcomes further reflect the structural challenges involved. Kosovo consistently ranks among the worst performers in PISA assessments. In 2022, only 15% of 16-year-old learners demonstrated at least Level 2 proficiency in mathematics, 17% in reading, and 21% in science; relative to OECD averages of 69%, 74%, and 76%, respectively. All three scores declined between 2018 and 2022, falling below the baseline needed for meaningful labour-market participation (ETF, 2026b).

3.1.4 North Macedonia

North Macedonia is experiencing a decline in numbers, with its resident population dropping to around 1.8 million in 2023. This represents a decline of nearly 200,000 since 2002. Young people, defined as those 15–24, make up approximately 18% of the population (ETF, 2026c). The working-age population grew slightly between 2022 and 2024, from 1,464,493 to 1,515,306; however, participation in the labour market ('economic activity') remains low by EU standards and is only falling: the overall economic-activity rate declined from 55.2% in 2022 to 52.3% in 2024, with a corresponding decrease in the employment rate, from 47.3% to 45.8%. Unemployment did decline somewhat over the same time, dropping from 14.4% to 12.4%. As for young people, only 46.3% of those 15–29 were participating ('economically active') in the labour market in 2024, with the breakdown being 35.5% employed and 10.8% unemployed. The large remainder of this age group, 53.7%, remained outside the labour force primarily because of enrolment in education and training, according to the MAKSTAT database (SSO, 2026). The NEET rate for people aged 15–29 has seen some decline over the years, dropping from 29.8% in 2018 to 22.6% in 2024, but still is double the EU average of 11.0%. The proportion of upper-secondary learners enrolled in VET has increased somewhat, from around 61% in 2019 to about 63% in 2022 (ETF, 2026c), yet the quality of general education remains concerning: in their 2022 PISA results, North Macedonia's 16-year-old learners underperformed in comparison to OECD averages for mathematics, reading, and science. Furthermore, average performance declined in all three domains between 2018 and 2022. This phenomenon highlights a need for systemic improvements in education outcomes (OECD, 2022).

3.1.5 Montenegro

Montenegro had a population of around 616,200 in 2023, and that population is ageing, in conjunction with a steady increase in life expectancy over the past two decades. Persistently low participation in the labour market, especially among women (51% in 2024), contributes to competencies' obsolescence and to reduction in worker availability (World Bank, 2026). The employment rate did, however, rise from 50.3% in 2022 to 56.4% in 2024, with the unemployment rate falling from 14.7% to 11.5%. Still, the structural issue of youth unemployment persists, and this figure (covering people aged 15–24), while declining, remains high, at 26% in 2024 – well above the EU average (14.9%). The NEET rate among people aged 15–29 came to 16.5% in 2024, down from 2022's 23.2% but still above the EU average of 11%.

While policy initiatives prioritise young people, total ALMP investment remains low, at just 0.03% of GDP (the country's professional-training scheme for university graduates is accounted for separately)

(ETF, 2026d). Education outcomes further spotlight the competence challenge. When Montenegro participated in PISA in 2022, with testing for students at 63 schools, only six of the 49 secondary schools taking part (general and vocational) exceeded the OECD average and one matched it. Furthermore, PISA scores since then have declined in all three testing domains: from 2015 to 2022, scores for reading dropped from 427 to 405; for mathematics, from 418 to 406; and for science, from 411 to 403, according to Montenegro's Examination Centre (2023).

3.1.6 Serbia

Estimates put Serbia's population at 6.62 million in 2023, which represents a 7% decline since 2011 in response to low natural growth, population ageing, and high emigration rates. In 2024, the overall employment rate for the 15–64 age group was 66.3%, showing an increase from 2023's 64.7%, and the unemployment rate was 8.9%, marking a decrease from the previous year's 9.7%. Labour-market participation among young people, who account for roughly 16% of the working-age population, remains well below EU averages. In 2024, the 'economic-activity' rate for individuals aged 15–29 was 49.7%, nearly seven percentage points lower than that of Serbia's EU counterparts. Nonetheless, there are encouraging signs: as of 2024, the employment rate for this age group stood at 41.3%, up from the 40.2% of 2023, and the unemployment rate at 16.8%, showing a decrease from 2023's 18.5%. The NEET rate for individuals aged 15–29 too declined slightly, to 14.9% in 2024, but it remains above EU levels. Also, 'economic inactivity' remains high, with 50.3% of people aged 15–29 outside the labour force in 2024, per SORS data (2026). As for PISA results, Serbia placed 40th for reading and science in 2022 and 42nd for mathematics (OECD, 2023b). Only 57% of PISA interviewees reached at least Level 2 in mathematics (the OECD average was 69%), and the average Serbian 16-year-old's PISA performance remained around 1.5 years behind the OECD average (World Bank Group & UNICEF, 2022). In addition, participation in lifelong learning is low: only 5.5% of adults aged 25–64 took part in education or training in 2024. The EU average is more than twice that, at 13.3% (ETF, 2026e).

3.1.7 The context as a whole

The six country profiles reveal common demographic and labour-market challenges, most prominently population decline, relatively high youth-unemployment and NEET rates, and widespread long-term unemployment. Consistently low participation in adult learning reduces opportunities for reskilling and exacerbates reliance on public measures to maintain employability and encourage short-term employment. Modest education outcomes for young people, proxied by PISA performance, further constrain labour-market readiness.

The scale and intensity of these challenges vary across national boundaries. Kosovo is characterised by very low labour-force participation and high NEET rates, Albania by persistent gender gaps in the labour market and weak adult learning, North Macedonia by declining labour-market participation and poor education outcomes, Montenegro by high long-term unemployment despite relatively high enrolment in the labour force, Serbia by demographic decline and high emigration, and Bosnia and Herzegovina by structural skills mismatches and emerging labour shortages. The underlying challenges nevertheless are broadly similar.

3.2 ALMPs with a work-based-learning component

This section provides a country-by-country description of ALMPs with a WBL component, in line with the definition provided above, as defined in detail in the 1. INTRODUCTION.

3.2.1 Albania

Albania's public employment service, the NESA, oversees all national ALMPs. Three of the programmes in place incorporate WBL, though to differing extent.

Albania's scheme referred to as the on-the-job training programme targets training of unemployed and unqualified jobseekers for a duration of four months, entirely in the workplace. The number of current beneficiaries was 338 in 2022, 183 in 2023, and 262 in 2024.

A second scheme, called the internship programme, was developed to ease the school-to-work transition process. Aimed at recent graduates who are still unemployed, this six-month programme is carried out entirely in the workplace setting. It had 929 beneficiaries in 2022, 633 in 2023, and 602 in 2024.

The third programme, known as the vocational-training programme, is designed for training unemployed people without any qualification, whether registered or not, through short-term courses. The WBL component is not compulsory, although it is recommended that 80% of the total course time be devoted to practical training. On the other hand, no more than half of any course should take place in the workplace. This takes the form of company-based vocational practice or traineeship, handled in the same way and with the same rules as internship organised by the country's VET providers for IVET and CVET programmes (ETF, 2025). The number of beneficiaries came to 14,917 in 2022, 15,134 in 2023, and 11,985 in 2024.

3.2.2 Bosnia and Herzegovina

In Bosnia and Herzegovina, WBL-oriented ALMPs are implemented within a multigovernance PES structure, comprising three separate systems operating independently, one of which extends further to ten cantonal service⁶.

Two main types of WBL-oriented ALMP can be identified.

The first set includes internship-type measures: standard traineeship (*pripravnički rad*) and, considerably less frequently, traineeship without establishment of employment (*stručno osposobljavanje bez zasnivanja radnog odnosa*). These measures are entirely work-based and implemented in accordance with legislative requirements (e.g., related to labour) and the relevant ALMP regulations. Both are linked primarily to first-time employment and typically target young graduates, in aims of preparing them for independent work by means of relevant work experience.

The second group of policies covers on-the-job training programmes, such as targeted training for placement with a known employer. Combining workplace-based training with employment support, these programmes are designed to align jobseekers' skills with specific employer needs or gaps in the labour market (ETF, 2026e).

3.2.3 Kosovo

In Kosovo, the state public employment service, the EARK, is the main entity responsible for ALMPs. Two of the programmes under those policies have a WBL component.

The first, called 'On-the-Job Training', is provided by an employer while a registered jobseeker is engaging in productive work. Its objective is to provide vocation-oriented preparation, in a specific trade or job, to smooth learners' return to employment. In all, 125 people benefited from the programme in 2022, with a peak in 2020, at 1,498 beneficiaries.

The other programme, dubbed 'the Internship Programme', is similar in essence to the first one except that it is reserved for unemployed people looking for work for the first time: recent graduates. Its number of beneficiaries shows great variation: it was 805 in 2022 after 2021's peak of 3,446 beneficiaries, which is assessed as strong participation by Kosovo standards.

⁶ These programmes are delivered by the Republika Srpska Employment Institute, the Brčko District of Bosnia and Herzegovina Employment Institute, and the Federal Employment Institute – in cooperation with cantonal PESes – as well as several cantonal PESes through their own resources (Bosnia-Podrinje Canton Goražde, Sarajevo Canton and Tuzla Canton)

Typically, participation in these programmes includes classroom-based activities at a vocational-training centre. In most cases, neither leads to a qualification: both programmes are generally designed to provide practical experience and competence development rather than formal credentials.

3.2.4 North Macedonia

In North Macedonia, five of the ALMPs managed by the country's PES (the ESARNM) have a WBL component. Only two of these policies currently involve significant numbers of beneficiaries, the programme called 'Traineeship' and the one referred to as 'training for occupations in high demand in the labour market' – 'Demand-driven Training' for short.

The Traineeship programme targets provision of practical knowledge and skills to unemployed people below 30 years of age who have reached at least upper-secondary-education level and have no work experience. The programme is not anchored in occupational competencies, and it does not lead to a qualification registered in the catalogue of qualifications attached to the national qualifications framework. Instead, the employer prepares the curriculum so therefore decides on the balance between theory and practice. Most of the training is work-based. There were 1,520 beneficiaries in 2022, 1,575 in 2023, and 1,209 in 2024.

Demand-driven Training is designed specifically to meet the needs of occupations with a high demand for workers (e.g., in the social services, for the green economy, and in e-commerce). Another aim is to increase the employability of emigrants returning to North Macedonia. As of this writing, the programme's worker-supply stream encompasses 23 fields of work. It had 129 beneficiaries in 2022, after which the number reached a peak at 1,079, then fell to 549 in 2024.

3.2.5 Montenegro

In Montenegro, it is the public employment service, here the EAM, that oversees ALMPs. The policy covering WBL, titled 'Education and Training for Adults', encompasses three sub-programmes, referred to as 'education and training', 'training for work with an employer', and 'training for independent work'⁷.

The first of these targets unemployed people specifically, with the goal of awarding vocational qualifications consistent with the CVET sub-sector, accredited by the National Education Council (NEC). The EAM's annual work plan specifies the amount of funding for this sub-programme, the qualifications for which the funds are provided, and the maximum number of applicants. The number of beneficiaries was 227 in 2023 and 213 in 2024.

The sub-programme that provides training for work with an employer is intended for those unemployed people without work experience whose lack of practical skills has been identified as an obstacle to their return to employment. The employer prepares the content, which consists entirely of WBL, without any theoretical component. Via support from mentors, beneficiaries are trained for specific tasks in relation to the selected occupation. This on-the-job training usually lasts six months. In 2023, 275 people took part, and there were 241 beneficiaries in 2024.

Finally, the 'training for independent work' sub-programme is geared to offer unemployed people aged below 30 who lack practical skills at the relevant level of education (III or IV) an opportunity to train for independent work presuming that level. The programme relies on statements of needs submitted by employers in the targeted trades, where the typical jobs are cook, baker, welder, waiter, and plumber. An employer, from the private or public sector, provides the content of the programme, which consists

⁷ As part of the IPA II project "Enhanced evidence-based policy-making, implementation of practices and coordination in the employment and social policy sectors and strengthened capacities for participation in the European Social Fund", within the framework of the Annual Action Programme for Montenegro 2020, the EAM has prepared a reformed Catalogue of ALMPs (<https://www.zzzcg.me/programi/programi-aktivne-politike-zaposljavanja>). The aim of preparing the Catalogue is to make the measures more transparent, flexible, and adapted to the real needs of the labour market. The modernisation of the measures is planned, especially in the area of education and training, through the introduction of new programmes aligned with modern, digital and green occupations. The catalogue was presented in early December 2025 at the event "Catalogue of ALMP measures: A new era of active employment policies", organised by the EAM (<https://www.zzzcg.me/nova-era-aktivnih-politika-zaposljavanja>).

entirely of WBL, without any theoretical component. The programme had 251 beneficiaries in 2023 and 204 in 2024.

3.2.6 Serbia

In Serbia, ALMPs fall under the public employment service, Serbia's NES. All ALMP-linked sub-programmes that have a WBL component are situated under an umbrella programme titled 'Additional Education and Training', aimed at providing vocational training and skills-development opportunities tailored to the needs of learners and the demands of the labour market. Its sub-programmes have been in place for 10 to 15 years. All feature 25% WBL at minimum. Although no official document specifies the WBL percentage beyond this, the amount of WBL likely in each sub-programme is known. The synthesis in Table 5.3 provides a breakdown.

Enrolment in Additional Education and Training is significant, with the numbers for the recently introduced sub-programme titled 'My First Salary', described further in the table, proving especially strong. It must be noted that this programme is not, however, aligned with the EU quality framework, since it exceeds six months. Take-up for most other sub-programmes has declined over the last few years, and it is only the My First Salary programme that has led to an increase in the total figure. The other sub-programmes with a WBL component are described in Serbia's country report (ETF, 2024e).

3.2.7 Summary of ALMPs with a WBL component

The countries' ALMPs cover a broad range of programmes, as the synthesis in Table 5.3 attests. Not all of these consist of at least 25% WBL. Where such a component does exist and is regulated, the profile varies considerably. In other cases, the extent of any WBL remains unknown since regulations are silent on this matter. Further complicating the landscape, take-up tends to be low (except in Serbia), and some WBL-based ALMPs operate at very small scale.

Table 3.1: A comparative outline of ALMPs with a WBL component

Country	Programme(s) with a WBL component	Eligible target	WBL's share in the programme(s)
Albania	Employment-promotion programmes:		
	■ On-the-job training	■ Unemployed and unqualified jobseekers registered with the NESA, who are trained on the basis of employer needs (Council of Ministers, 2020b)	100%
		■ On-the-job training under the Youth Guarantee scheme: young NEETs participating in 3–6-month on-the-job training in companies (Council of Ministers, 2023c)	90% (10% is theory)
	■ Internship programme	■ Unemployed jobseekers and recent graduates, engaged to facilitate transition to employment (Council of Ministers, 2020b)	100% (six-mo. paid job)
	■ Vocational training (with an optional traineeship component)	■ Jobseekers (registered and non-registered) who lack a qualification, trained through short-term courses organised by the NESA and its VET providers	Up to 40%

Country	Programme(s) with a WBL component	Eligible target	WBL's share in the programme(s)
Bosnia and Herzegovina	Internship measures: ■ Internship-style professional training without establishment of an employment relationship	■ Jobseekers or registered unemployed graduates of secondary and tertiary education, primarily without work experience, in connection with their first entry to employment, either as initial work experience or for meeting the experience prerequisite for access to independent professional practice (placements in the public sector predominate)	100%
	■ On-the-job training programmes such as targeted training for placement with a known employer, 'Training and Employment Programmes', and training for the labour market that has a workplace component	■ Registered unemployed persons and other jobseekers requiring skills that mesh with employer needs, alongside employers applying for support to train and recruit workers, predominantly in the private sector	Typically 25–100%
Kosovo	■ On-the-job Training	■ Unemployed persons / jobseekers aged 18 to 64 registered with the EARK (people become eligible to register or reactivate their registration if unsuccessful after three months of job search) under a programme open to private, public, and not-for-profit entities on the employer side and with flexible hours for persons with disabilities	A majority
	■ The Internship Programme	■ Unemployed recent graduates from higher-education (HE) institutions, upper-secondary (gymnasium or vocational) ones, and vocational-training centres (VTCs) or other vocational-training institutions who are seeking their first work experience (youth-focused schemes exist, implemented via the EARK: the Ministry of Culture, Youth and Sports targets ages 18–24, and KIESA targets HE graduates under age 30)	A majority
Montenegro	Education and training of adults: ■ Education and training (CVET)	■ Unemployed persons applying to the EAM who enquire about obtaining vocational qualifications in NEC-accredited adult-education (CVET) programmes, with qualification and cohort sizes specified annually by the EAM	NA
	■ Training for work with an employer	■ Unemployed persons without work experience whose lack of practical skills has been identified as a barrier to employment (training consists entirely of WBL with an employer that provides mentor support, typically for six months)	100%

Country	Programme(s) with a WBL component	Eligible target	WBL's share in the programme(s)
Montenegro	Training for independent work	Unemployed persons under age 30 who lack practical skills commensurate with a given education level, for learning geared to employer-stated needs that employs people without work experience at levels III–IV (training with employers consists entirely of WBL)	100%
North Macedonia	Traineeship (per the country's Operational Plan)	Unemployed people at ages up to 29 who possess at least upper-secondary-level education and have no work experience (per the targeting for 2024 set by the ESARNM).	>50%
	Demand-Driven Training	Unemployed people, for training defined annually by a technical working group, incorporating streams for high-demand occupations, social services, 'green jobs', and e-commerce, with explicit aims of increased employability for jobseekers who have returned from abroad (enrolment criteria vary by training area)	33% (one month out of three)
	Training for drivers	NA	45–60%
	On-the-job training for a specific employer	Unemployed people in the employment-service database (guaranteed-minimum-assistance beneficiaries, women, Roma, young people aged up to 29, people with disabilities, and the long-term unemployed)	100%
	Professional training qualifications (employer-defined)	Unemployed people registered in the employment-service database	NA
Serbia	Additional Education and Training:		
	Professional practice	Unemployed persons under age 30 with secondary or higher-education qualifications and no work experience in their field, with priority to health care, social protection, education, and the public-sector judiciary	100%
	Internship for young people with higher education	Unemployed people below 30 with HE qualifications and no work experience in their field, targeting the private sector	100%
	Internship for young persons with secondary education	Unemployed individuals under 30 with secondary education and no work experience in their field	100%
	Acquisition of practical knowledge	Unemployed persons with secondary education or who have recently completed FEEA, dropouts from secondary education, and the otherwise poorly qualified	100%

Country	Programme(s) with a WBL component	Eligible target	WBL's share in the programme(s)
Serbia	Training for the labour market	Hard-to-employ persons, such as those with poor/no qualifications, who have not completed secondary school, and who are completing FEEA	70–80%
	Training at an employer's request (for the unemployed)	Unemployed persons who meet the general/specific training requirements when no suitable candidate exists in the NES register	70–100%
	The My First Salary youth-employment-promotion programme	Unemployed persons under 30 with at least secondary education and no work experience in their field of studies	100%

3.3 Assessment through the European Quality Framework for Traineeships

With the necessary groundwork laid, this section proceeds in analysing ALMPs with a WBL component. Each sub-section below considers the six Western Balkan countries in relation to one criterion in the European Quality Framework for Traineeships.

3.3.1 Written traineeship agreement (Criterion 1)

Agreements on the training exist to ensure clarity of the rights and obligations for both the learner and the company providing the training, along with any employment agency or external VET provider involved. A typical training agreement states important information such as the start date and duration of the training, the occupation or job for which it is being provided, the training's content and/or objectives (often with reference to a qualification framework), working hours, remuneration, holiday entitlement, any probationary period, and termination conditions. Making these matters clear safeguards against misunderstandings.

Tripartite agreements are common for WBL-related ALMP-aligned programmes in Albania, Kosovo, North Macedonia, and Serbia. Montenegro and BiH, in contrast, rely on bilateral contracts. The former uses either EAM–employer or EAM–learner agreements (as the programme type dictates), while the latter typically applies a set of parallel two-party agreements to the PES, employer, and trainee. Serbia uses detailed agreements, incorporating various contract mechanisms, which depend on the programme type: tripartite arrangements for My First Salary, employment contracts where relevant, training contracts, etc.

As for content, all six countries specify the programme duration, compensation, and basic rights/obligations. Some include confidentiality clauses. Albania alone states explicit termination terms. The table below summarises the mechanisms and the nature of the content (further information about compensation, work hours, and leave is presented under Criterion 3).

Table 3.2: A summary for Criterion 1

Country	Which ALMPs entail a written agreement	The parties involved	What is included
Albania	On-the-job training, internship, and vocational-training traineeships	Employer, jobseeker, and regional PES / NESA (tripartite) or individual and employer	Rights and responsibilities, work conditions, compensation, duration, termination terms, and confidentiality
Bosnia and Herzegovina	All observed	Trainee, employer, and PES (varying somewhat with the PES system and programme)	Duration, compensation, and rights and obligations (with some PES-system and programme-based variations)
Kosovo	Both OJT and internship	For OJT: trainee, VTC, and employer; for internships: trainee, Employment Office, and employer	Duration, compensation (at least minimum wage or up to 70% of standard wages), and roles and obligations
Montenegro	All three programmes (education and training, training with an employer, and training for independent work)	PES (EAM) and employer, while learners sign with the EAM or the employer	Duration, number of applicants, compensation, and rights and obligations
North Macedonia	All programmes	Trainee, PES (ESARNM), and traineeship provider; also ESARNM and trainee, plus ESARNM and provider	Rights and obligations, working hours, allowance, termination rules, duration, and compensation
Serbia	All sub-programmes of Additional Education and Training	PES (NES), employers / other training providers, and learners	The programme's legal basis, compensation, working hours, confidentiality, and termination provisions

3.3.2 Learning and training objectives (Criterion 2)

Stated learning objectives or learning outcomes give learners and trainers alike a clear idea of what is to be achieved during the training. On both sides, they supply guidance for planning and implementing the training.

Formulation of learning objectives varies considerably by country and programme type. In Albania, they are explicitly defined only for the on-the-job training and vocational training programmes, while internships lack any stated learning goals. Kosovo follows a similar pattern: an individual training plan (ITP) formally establishes the objectives for On-the-Job Training, while internships do not involve structured learning outcomes. In Montenegro, objectives are clearly defined via either NEC-accredited CVET curricula or employer-developed training programmes, ensuring alignment with occupational standards. North Macedonia, in turn, makes learning objectives integral to the structure of Traineeship and Demand-driven Training. Contrastingly, objectives in Serbia remain broad and general, serving system-level aims such as improving employability rather than specifying individual learning outcomes for each participant. In Bosnia and Herzegovina, these are formally defined (e.g., in the Republika Srpska and the Brčko District of Bosnia and Herzegovina frameworks); however, placing them largely in employers' hands had led to uneven articulation across measures. There is little evidence of individualised learning objectives.

Formal training plans supply crucial structure in Albania, Kosovo, and North Macedonia. Albania and Kosovo require an ITP for their on-the-job training and a formal traineeship plan for vocational training, while internships are implemented without such instruments. Montenegro's CVET programmes follow

formal curricula, and the employer-led programmes are based on company-developed plans. In North Macedonia, both internships and training for occupations in demand must be supported by written curricula or verified programme documentation that specify tasks and learning outcomes. Employers in Serbia must submit training plans as a part of their proposal to the NES, but these are of a general nature; there are no learner-specific plans. Finally, neither training plans nor programmes in Bosnia and Herzegovina are consistently mandated or assessed. These often are linked to administrative requirements rather than to learning design.

Support and guidance arrangements likewise differ in scope and consistency. Trainees in Albania get supervised by an in-company trainer who follows up on the training plan's implementation. Kosovo follows a similar approach, with employers required to nominate supervisors; however, the quality and consistency of mentoring vary greatly. In Montenegro, guidance is inherent to the employer-led delivery model, wherein mentors or instructors design and oversee the practical component. North Macedonia guarantees continuous support through designated mentors and an obligation to report on attendance and progress, while learner guidance in Serbia is indirectly referenced in contracts, which oblige employers to enable independent work but do not specify formal mentoring arrangements. Requirements in Bosnia and Herzegovina vary across administrative-unit and programme boundaries: the Republika Srpska Employment Institute requires submission of an internship programme and justification of the employer's capacity claim, appointing a mentor is mandatory in the Brčko District of Bosnia and Herzegovina, etc. Less consistently defined requirements characterise the Federation of Bosnia and Herzegovina and the BiH cantonal level. Some BiH on-the-job training programmes, most notably those implemented by the Federal Employment Institute, require submitting a training programme and appointing a mentor, although such requirements are not consistently enforced across all measures – there is little evidence of structured mentoring or systemic follow-up of learning progress.

Table 3.3: A summary for Criterion 2

Country	Programme(s)	Setting of learning objectives	Formal training plans	Support and guidance to learners
Albania	On-the-job training, internship, and traineeship	Only for OJT and vocational training; none for internship	Present for OJT (via ITPs) and traineeship but not internships	Supervisor monitoring based on plans for OJT and traineeships
Bosnia and Herzegovina	Internship-type professional training without the establishment of an employment relationship On-the-job training	Partial – objectives generally defined but often delegated to employers	Varying across labour frameworks, PES systems and programmes	Workplace-based mentoring, which varies with the labour framework, PES system, and programme
Kosovo	On-the-Job Training and the Internship Programme	For OJT only; no formal objectives for internship	Present for OJT (via ITPs) but not internships	Nomination of supervisors but with inconsistent guidance
Montenegro	CVET and employer-led training	Explicit (via the NEC or employer-defined)	Present via curricula or an employer programme	Employer-led design and delivery
North Macedonia	Traineeship and Demand-driven Training	Within an employer-defined curriculum or verified programme design	A curriculum mandate, whereby contracts reflect a specified plan	Assigned mentors and provider submission of monthly reports

Country	Programme(s)	Setting of learning objectives	Formal training plans	Support and guidance to learners
Serbia	Multiple programmes providing WBL under Additional Education and Training	Broadly defined rather than individualised	Employer submission of training plans (not individual-specific)	Contractual obligations referring to independent work

3.3.3 Working conditions suitable for trainees (Criterion 3)

Compensation varies significantly, with full or partial wage coverage in Albania and Kosovo; fixed stipends or partial support in North Macedonia and Serbia, particularly for non-employment-based programmes; and two distinct arrangements for the internship-type measures in Bosnia and Herzegovina. Trainees in one BiH system receive partial wage subsidies and are considered employees, while those in the other receive only allowances and retain 'unemployed' status. The structure of Western Balkan OJT programmes typically utilises two phases: initial training with allowances, then employment, for which wages subsidies apply.

In some cases, the law sets the working hours. North Macedonia has imposed a cap of 40 hours/week and bans night work, and Kosovo sets a full-time norm and includes probation rules.

Insurance cover (health and/or accident) is a feature common to all countries.

The presence of an employment contract affects leave rights: in Montenegro, only the employer-led programmes (training for work with an employer and for independent work) confer formal holiday entitlements.

Contract terms routinely address confidentiality, provision of work equipment, liability for damage, and supervision by the employer, though enforcement quality varies.

Table 3.4: A summary for Criterion 3

Country	Programme(s)	Compensation and allowances (regulated in training agreements)	Insurance and social protection	Work hours and leave	Other conditions
Albania	On-the-job training, internship, and traineeship	For OJT, 100% of minimum wage and 2,000 ALL (€20) to the trainer; for internships, 50% of minimum wage; for traineeship, no payment for the trainee but small allowances possible for transport, food, etc.	For OJT, social and health contributions; for internships, accident insurance; for traineeship, 0.3% of the gross minimum wage toward accident insurance	Contract-specified limits to working time and rest time, compliant with Albanian law	OJT and internship contracts' terms for rights, responsibilities, and confidentiality (vocational traineeship contracts alone lack a confidentiality clause)
Bosnia and Herzegovina	Internship Internship-type professional training without the establishment of an employment relationship On-the-job training	Partial ALMP-allocated wage support, while labour legislation requires 70–80% of the basic salary (to be covered by the employer); other allowances derived from the employment relationship Variable wage support, with no statutory salary basis; allowances via ALMP instruments or the employer Variable wage support, without statutory salary; ALMP- or employer-based allowances	Status-linked protection: full cover under an employment contract and coverage as an unemployed person otherwise	Labour laws' application where employment exists; in some cases, ALMP-defined conditions also	-
Kosovo	On-the-Job Training and the Internship Programme	On-the-Job Training: compensation of up to 70% of minimum wage (average: €174), sometimes topped up by the employer; Internship Programme: monthly assistance equalling at least minimum wage (this varies over a wide range, €50–350, and averages €171 for private positions and €239 for public ones)	Health and accident insurance provided in both programmes	On-the-Job Training: full-time at 8 hours/day, 5 days/week, with flexibility for disabilities; Internship Programme: probation of 10 days, no leave provisions specified	Supervision, mandated but inconsistently applied; monitoring by employment offices or the VTC

Country	Programme(s)	Compensation and allowances (regulated in training agreements)	Insurance and social protection	Work hours and leave	Other conditions
Montenegro	Education and training, work with an employer, and independent work	Education and training: no salary (learners receive compensation from the EAM); the other two schemes: employment contracts, with salary paid for six months by the EAM and three months by the employer (implying full-wage level)	Education and training: health insurance only, with no holiday entitlement; the other two programmes: pension and health insurance and also holiday entitlement, since the work is subject to an employment contract (protective equipment provided)	Application of standard employment-contract conditions except for education and training, which does not entail employment	No employment contract with an employer for education and training
North Macedonia	Traineeship and Demand-driven Training	Traineeship: allowance equivalent to approx. €180/month, incl. €50 insurance/tax), with the training provider getting paid approx. €490 per trainee	Compensation for trainees that includes insurance, with training also inclusive of cover against disability (protection and hygiene equipment must be provided)	Traineeship: 40 hours/week at max., no work between 2200 and 0600; other programmes: terms not precisely defined, but attendance obligations apply	A requirement that trainees not cause negligence-based damage
Serbia	All WBL-including programming under Additional Education and Training	Internships and programmes for acquiring practical knowledge: PES (NES) reimbursement to the employer for net minimum wage and statutory contributions, +20% in HE cases; My First Salary: €240–290/month directly to the learner (employer top-up possible); other programmes: fixed monthly assistance (€255–300), transport support, and insurance	Social/health-insurance and accident-insurance coverage in all programmes that involve employment or support	Time-related specifics that vary per contract; terms of labour law applicable when an employment contract is in place	Contracts' inclusion of a confidentiality clause and obligations to provide mentorship and tasks

3.3.4 Rights and obligations (Criterion 4)

Criterion 4 encourages the parties concerned to make sure that the traineeship agreement lays down the rights and obligations of the trainee and the traineeship provider, including, where relevant, the provider's policies addressing confidentiality and ownership of intellectual property.

All countries clearly define the rights and obligations of the parties involved through ALMP-related agreements or legal frameworks. Nevertheless, some minor shortcomings persist. For instance, Albania's vocational traineeship scheme appears to lack explicit confidentiality provisions.

Serbia's contracts and public invitations give solid structure to the obligations connected with confidentiality, data protection, and intellectual property rights. Compliance with these is formally enforced. North Macedonia provides particularly detailed provisions regarding attendance, equipment use, confidentiality, and the consequences of infractions.

Kosovo and Albania strive for ironclad rights and obligations through standard contracts, yet enforcement exhibits some variability (Kosovo's handling of supervision is inconsistent, and in Albania confidentiality provisions appear to be absent or insufficiently specified in some traineeship agreements). In Bosnia and Herzegovina, rights and responsibilities with regard to confidentiality and the ownership of intellectual property are not explicitly embedded in ALMP design.

Table 3.5: A summary for Criterion 4

Country	Extent of rights and obligations	Observations
Albania	Specified in contracts for on-the-job training or internships, while traineeship lacks a confidentiality clause	Confidentiality included for only two programmes
Bosnia and Herzegovina	No explicit embedding in ALMP-based programmes' design Republika Srpska: a structured contractual framework supported by contract templates and guidance Federation of Bosnia and Herzegovina: some guidance in place but without standardised templates Brčko District of Bosnia and Herzegovina: no data/evidence related to templates and guidance	Contractual arrangements were not analysed
Kosovo	Clear definitions in both On-the-Job Training and Internship Programme agreements	Trainee and employer roles are outlined; confidentiality is implied
Montenegro	Rights and obligations established via laws and formal contracts	The content includes tailored training that respects learners' needs
North Macedonia	Somewhat detailed terms in programme-specific contracts and rules	Demand-driven Training lacks specific provisions to address working conditions, confidentiality, and intellectual property rights
Serbia	A comprehensive contract framework in place	Terms cover mentors' obligations, confidentiality, and provision for individualised-plan rights

3.3.5 Reasonable Duration (Criterion 5)

To preclude misuse of traineeships, such as benefiting from low-cost labour without providing genuine learning opportunities, the EQFT recommends a maximum duration of six months, with sound justification for all exemptions. Most programmes in the countries assessed indeed maintain an upper limit of six months, thereby aligning with the framework's guidance.

There are three exceptions:

- Serbia's My First Salary may continue to a maximum of nine months.
- Internships in Kosovo and for young people in Serbia with a higher-education qualification can extend to 12 months.
- In Bosnia and Herzegovina⁸, internships for HE graduates typically are set up for 12 months. Although the duration of work-experience placements varies, the data available do not allow for clear, comprehensive identification of sector- and occupation-specific requirements. On-the-job training, in contrast, typically lasts 3–6 months, though its length varies with the measures involved, and more complex versions often are followed by subsidised employment, of varying duration.

Usually, durations are shorter (for instance, 3–4 months) in Montenegro's 'education and training' and for Kosovo's WBL components. The averages for these countries are roughly three months for CVET and 4.3 and six months for On-the-Job Training and the Internship Programme, respectively.

Table 3.6: A summary for Criterion 5

Country	Programme(s)	Duration in most cases	Maximal duration
Albania	OJT, internship, and traineeship	Four months for OJT), six for internship, and five weeks for traineeship	Four months for OJT, six months for internship, and 12 weeks for traineeship
Bosnia and Herzegovina	Internship Internship-type: professional training without the establishment of an employment relationship Various on-the-job training measures	Duration of 6–12 months, hinging on the qualification and ALMP design Three to six months, with duration linked to ALMP design where programme structures are more complex	A limit of 12 months for internship arrangements Up to 12 months in ALMP-based work (e.g., 6 mo. with the possibility of a six-month extension) Up to 18 months within some schemes (e.g., 3 mo. of subsidised training + 6 mo. of employer-financed employment + up to 15 mo. of subsidised employment)
Kosovo	On-the-Job Training and the Internship Programme	On average, 4.3 months for On-the-Job Training and six for internships	Six months for On-the-Job Training and 12 months for the Internship Programme
Montenegro	CVET and other training programmes	On average, three months for CVET and six for other programmes	Six months
North Macedonia	Traineeship and Demand-driven Training	Three months of training in either case	Traineeship: up to six months; Demand-driven Training: a fixed three months

⁸ The draft Youth Guarantee Action Plan of Republika Srpska envisages reducing internships from twelve to six months for higher education graduates

Country	Programme(s)	Duration in most cases	Maximal duration
Serbia	Multiple sub-programmes under the umbrella programme	Programme-dependent duration, but six months is typical	My First Salary: nine months; internships: up to 12 months

3.3.6 Proper recognition of traineeships (Criterion 6)

Formal recognition exists in Montenegro, North Macedonia (this is limited to a vocational qualification from Demand-driven Training⁹, as employer-demand-based training, while traineeship does not lead to a qualification), and Serbia (via accredited providers: recognition, via certificates and attestations, is strongly tied to the provider's accreditation). Albania, in turn, recognises professional-training qualifications but without connecting them to the national qualifications framework (the AQF). Bosnia and Herzegovina recognise their internships by means of labour laws and further legislation; however, in the absence of clearly defined conditions and consistently applied criteria for occupations requiring prior work experience, assessment of recognition's applicability remains case-specific, depending on any employer rulebooks or collective/sector-wide agreements. While BiH ALMP-supported on-the-job training programmes systematically grant certificates of completion, the absence of a well-adopted qualifications framework and of mechanisms for recognising prior learning implies limited transferability of such certificates between settings. Kosovo lacks any structured recognition of the learning outcomes from its OJT and internship.

Table 3.7: A summary for Criterion 6

Country	Programme(s)	Recognition	Formal (partial/full) qualification?
Albania	All traineeship within vocational training	A certificate issued by the VET provider (non-AQF)	No
	OJT and internships	None	No
Bosnia and Herzegovina	Internship-type professional training without the establishment of an employment relationship	Labour laws and further legislation (with case-by-case application)	No
	On-the-job training	A certificate of completion (non-formal, with limited transferability)	No
Kosovo	On-the-Job Training and the Internship Programme	None	No
Montenegro	The education and training sub-programme	A national vocational certificate	A national qualification certificate issued by an accredited provider (within an NEC-accredited programme)
Montenegro	Employer-led training	A completion certificate from the employer	No

⁹ This recognition is limited to vocational qualifications and is not currently linked to formal education/NQF. This gap is expected to be addressed through the 2025 Law on Adult Education adopted in December 2024.

Country	Programme(s)	Recognition	Formal (partial/full) qualification?
North Macedonia	Traineeship	A participation certificate	No
	Demand-driven Training	A certificate from the provider	Yes (partial/full vocational qualification)
Serbia	Most programming under the additional-training umbrella	A certificate / attestation / confirmation	Yes, if the provider is accredited as a 'PROAE'

3.3.7 Transparency requirements (Criterion 7)

Designed to guarantee all potential candidates fair and equal access, transparency requirements are designed to avoid hidden or informal recruitment. The central aim is easy access to traineeship opportunities and to information about related matters, such as the application procedures, selection criteria, and training conditions.

Transparency varies markedly across the six countries, which exhibit striking differences in how clearly the terms and conditions of work-based learning placements under ALMPs get communicated to potential participants.

Firstly, Montenegro, North Macedonia, Kosovo, and Serbia meet transparency expectations comprehensively in their publishing of invitations, provider information, and outlines of the selection criteria. Kosovo and Montenegro emphasise inclusive selection processes and equal access, extending their outreach to vulnerable groups. Inclusiveness in Kosovo has become institutionalised in formal targeting rules, local outreach, and donor-supported mechanisms that prioritise equity in access under ALMPs. Montenegro's operationalisation of inclusiveness entails transparent public calls for participation, monitoring of participant-group breakdown, and disaggregated reporting, all in pursuit of equal access across social groups.

North Macedonia supplements online promotion efforts with employment fairs, thereby engaging a broader stakeholder base. In Serbia, additional guidance supplied through employer instructions makes for clearer requirements and processes.

Albania offers basic procedural information but stands out in not advertising open positions. The limited view of vacancies limits transparency as envisioned in EQFT criteria 14 and 15.

Bosnia and Herzegovina demonstrates partial alignment with transparency expectations. In general, PESes release public invitations and eligibility criteria, thus providing basic access to programme information. However, the level of detail varies across the policy landscape. Also, key elements such as training content, learning objectives, work conditions, and post-training arrangements do not get systematically disclosed. In addition, the absence of a requirement to advertise traineeship positions publicly, when combined with voucher-based approaches, precludes full transparency and equal access for potential participants.

Overall, Kosovo, North Macedonia, and Serbia demonstrate comprehensive transparency extending from programme access to clear disclosure of the employment and insurance conditions. Montenegro meets most requirements through its contractual framework and public invitations. While BiH and Albania mesh with the framework partly, as the eligibility criteria and access procedures are generally available to the public, both countries show transparency gaps with respect to traineeships' substance. Namely, Bosnia and Herzegovina provides relatively restricted information on the training content, learning conditions, and post-placement arrangements, and information on specific training opportunities and programmes in Albania is not conveyed consistently across ALMP-based measures.

Table 3.8: A summary for Criterion 7

Country	Publication and access	Transparency ¹⁰ and guidance	Information on conditions and terms
Albania	Procedures for registration in employment-promotion programmes published by the PES; accessible information on specific programme types (internship and on-the-job training)	Selection mechanisms articulated while information on placement matching and employers is limited; vacancies not advertised	No details about compensation or insurance published
Bosnia and Herzegovina	Public invitations and eligibility criteria published by the PES; programme information accessible through official channels	Selected criteria defined, but matching possible beyond PES mediation; vacancies not systematically advertised	Financial support often specified, while there is limited information on training content and learning objectives
Kosovo	Detailed EARK-published programme descriptions, eligibility criteria, and application processes for OJT and internships; opportunities advertised publicly	Transparent selection through employment offices; matching based on clear eligibility criteria	An explicit declaration that participants are informed about financial-compensation ceilings, health and accident insurance, sick leave, and holiday entitlements
Montenegro	Public EAM-issued invitations to the unemployed, employers, and other training providers via online and other media; results of participation calls published	Transparent public calls with clearly defined conditions; results available online	Well-described conditions: employment contracts (for the two employer-led programmes), clear indication of salaries/compensation and insurance cover, and explanation of coverage (for health, pension systems, and protection against accidents)
North Macedonia	Promotion of annual participation calls via the ESARNM and adult-education centre websites and at employment fairs; programme duration and eligibility specified in the advertisements	Two-pronged invitations (for employers and unemployed persons) and transparent matching; contracts formalising the co-operation	Terms detailed in contracts: duration, the allowance/compensation, and insurance against work-related injury and occupational illness; description of the work hours and rest provisions
Serbia	Publishing of all public invitations on the NES website, alongside guidance for employers on training-programme design	Standardised, open calls for involvement in all programmes; NES-supervised selection and contracting	Highly detailed public invitations and contracts, which specify the monthly allowances (by education level), health and accident insurance, social contributions, and compensation responsibilities of the NES and employers

¹⁰ How openly and clearly the recruitment or matching process is communicated.

3.3.8 Cross-border traineeship (Criterion 8)

Criterion 8 pertains to traineeship activities that take place at least partially in a country different from the trainee's country of residence.

None of the country reports document any cross-border traineeship programmes currently operating in any of the six countries.

The materials provided from Albania, Kosovo, North Macedonia, and Serbia make no mention of cross-border WBL opportunities. Likewise, the study covering Bosnia and Herzegovina did not identify any systematically organised cross-border traineeship delineated under ALMPs.

Montenegro has made forays into cross-border co-operation, but its documentation does not address implementation beyond this initial engagement (actual trainee exchange, placements across borders, etc.).

Overall, cross-border traineeship mobility remains underdeveloped in all six countries. Montenegro is the only country that refers to cross-border cooperation, through its participation in a joint project with Albania. However, no concrete provisions or measures supporting traineeship mobility have yet been identified.

3.3.9 Use of EU funds (Criterion 9)

Montenegro is the only Western Balkan country in which an EU-funded initiative (twinning under the IPA) is explicitly mobilised for strengthening WBL components in active labour-market programming.

Bosnia and Herzegovina, North Macedonia, and Serbia acknowledge broader EU financial support for their ALMP-underpinned systems but do not link this support specifically to a WBL component.

Albania and Kosovo make no obvious references to EU financial instruments supporting WBL under active labour-market policies.

Table 3.9: A summary for Criterion 9

Country	Direct use of EU/IPA/ESF and other funds for WBL under ALMPs	Observations
Albania	Not mentioned	-
Bosnia and Herzegovina	Not directly linked to WBL-oriented ALMPs	International funding from EU and other institutions supports ALMP-based systems, Youth Guarantee preparation, and institutional capacity-building
Kosovo	Not mentioned	-
Montenegro	Present	Twinning project MN 29 IPA SO01 22, supported by the European Commission, is designed to strengthen the EAM's capacity to implement active employment measures (including ones that encompass WBL), prepare for future ESF participation, and supporting the Youth Guarantee initiative
North Macedonia	Not directly linked to WBL	European Union funding (via IPA programmes) supports employment activation, jobseeker services, and institution-building at ESARNM level, though no support specific to WBL components is evident
Serbia	Not explicitly linked to WBL	Multiple EU-funded projects (IPA 2012, IPA 2013, 2020 Youth Guarantee, etc.) underpin NES capacity development and ALMP

Country	Direct use of EU/IPA/ESF and other funds for WBL under ALMPs	Observations
		implementation; however, the WBL sub-components are not individually referenced in connection with EU funding

3.3.10 Use of the European Quality Framework for Traineeships (Criterion 10)

North Macedonia and Serbia demonstrate active engagement with the EQFT. In Serbia, this includes national preparations for legislative alignment.

Albania and Kosovo largely meet the core EQFT criteria in their practice, though without explicit references to alignment with that framework or formal certification of outcomes.

Montenegro, in turn, shows signs of emerging alignment through EU-funded capacity-building linked to quality assurance for WBL.

Within Bosnia and Herzegovina's multi-level governance system, several policies address selected elements of the EQFT. Its references are not systematic, and alignment remains uneven. That said, while established programmes lack direct reference to the framework, emerging initiatives – preparations for the Youth Guarantee scheme most notably – cite the framework even in their early stages.

Table 3.10: A summary for Criterion 10

Country	Explicit reference to the EQFT?	Alignment indicators	Shortcomings
Albania	No	Contracts, training plans, compensation, supervision, and vocational traineeships all align with the EQFT	Lack of outcome recognition in OJT and internship settings; no cross-border dimension
Bosnia and Herzegovina	No (emerging references in Youth Guarantee preparation)	Several ALMPs encompass elements of the EQFT (related to contracts, financial support, and basic monitoring), and initial references are visible in Youth Guarantee preparation	Uneven alignment across ALMP domains; predominantly compliance-oriented monitoring; rather limited focus on learning outcomes and quality assurance; no cross-border dimension
Kosovo	No	Contracts, transparency, ITPs, and supervision align with the core criteria	Learning outcomes' recognition and quality consistency vary
Montenegro	No, but projects imply linkage	Provider evaluation and Youth Guarantee work point to emerging congruence	The EQFT is not formally referenced; the cross-border dimension is limited
North Macedonia	Yes	Programme operations (contracts, curriculum, recognition) are explicitly guided by the EQFT	Cross-border mobility is absent
Serbia	A draft law based on the EQFT	Contracts, compensation, duration, and certification follow the framework; legislative alignment is in progress	Some programmes last longer than six months; the proposed law remains pending

3.4 Conclusions

The assessment of WBL under ALMPs revealed a mixed picture of progress and persistent challenges. Analysis in light of the EU quality criteria for traineeships and related standards highlighted strengths shared by Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, and Serbia but also points to important gaps.

3.4.1 Strengths

All six countries have made significant strides toward formalisation of WBL in programmes under their ALMPs, although the scope and advancement level vary significantly across contexts. One valuable common feature is the requirement of written contracts or other agreements that outline the rights and obligations of learners, employers, and implementing agencies. Contractual arrangements that hence address such issues as compensation, working hours, and leave are central to ensuring mutual understanding and compliance with programme rules.

Many programmes, across the region, articulate learning objectives and training plans. Albania's vocational-training programme integrates learning objectives into its traineeship design; Kosovo's On-the-Job Training requires an ITP; North Macedonia's Demand-driven Training system details the expected skills and the tasks involved; and Montenegro enforces stated objectives wherever accredited vocational-qualification programmes are involved. Serbia specifies its assessment obligations in contracts, and ALMPs state that most programmes must ultimately yield a confirmation or certificate of qualification. Such elements are present in a few programmes observed in Bosnia and Herzegovina.

Likewise, insurance coverage and appropriate work conditions are widely guaranteed. Learners generally are entitled to health and accident insurance, in some cases also accumulating social and pension contributions as well as holiday entitlement as long as an employment contract is in place. Compensation and working hours are often clearly specified, either directly by the provider of employment services or by the employers. This reinforces the protection framework.

In general, programme duration is consistent with the EU quality framework's guidance, remaining between three and six months. Montenegro's and Serbia's programmes show flexibility for extension to support specific youth-oriented measures while still maintaining regulatory compliance. On-the-job programmes in Bosnia and Herzegovina demonstrate wider variation across measures, though broadly remaining within the six-month window.

Assessment and recognition mechanisms exist in varying forms. North Macedonia and Montenegro link some ALMP-based training directly to vocational qualifications, issued by competent authorities. Serbia provides supplementary attestations or certificates, while Albania integrates recognition deeply into its vocational-training programme framework. Bosnia and Herzegovina legally guarantees recognition of ALMP-supported internships.

Finally, transparency and accessibility of information stands out consistently as a strength in nearly every country. Employment services across the region publish public calls for participation, programme descriptions, and the selection criteria on their websites. Montenegro and Serbia demonstrate particularly solid efforts to ensure comprehensive public access to vacancies and training opportunities, encouraging equality of opportunity. At the other end of the spectrum, Bosnia and Herzegovina still provides basic-level transparency through public invitations, with some variation in the level of detail across measures.

3.4.2 Challenges and gaps

The progress notwithstanding, shortcomings are evident in several areas. Learning objectives and supervision do not always get systematically defined. For example, Albania's internship programme does not incorporate tools for planning or monitoring the learning objectives, while in Bosnia and Herzegovina both the objectives and mentors' roles are either vaguely defined or entirely absent at the

policy-design stage. In Kosovo, ITPs seldom get shared with trainees; and Serbia's contractual provisions remain generic rather than tailored to programme specifics.

Recognition of outcomes too remains uneven. While Montenegro's programme for 'education and training' and North Macedonia's Demand-driven Training lead to vocational qualifications, the on-the-job training and internship programmes in Albania and Kosovo's On-the-Job Training and Internship Programme do not confer formal recognition. Other programmes issue completion certificates or attestations that do not represent full-fledged qualifications. For instance, while Bosnia and Herzegovina's OJT programmes typically grant certificates of completion, recognition remains largely non-formal and is left to the discretion of future employers. This restricts the portability of the skills obtained and their linkage to formal qualification pathways. In addition, the assessment mechanisms underpinning recognition of internships are not always clearly defined; some seem to be the fruit of case-by-case choices influenced by particular sectors' requirements and, at times, employer practices.

Compensation practices vary and, in some cases, lack fairness. Kosovo does not legally oblige employers to pay interns, and sectors differ in how they respond. Disparities in compensation levels between public and private employment reduce equity further. The reports from Albania, Montenegro, and Serbia also cite allowance and financial-support amounts that depend on the programme type, with similar patterns observed across measures in Bosnia and Herzegovina's application of allowances.

Programme durations occasionally exceed the recommended maximum. Serbia's My First Salary programme, at up to nine months long, reaches beyond the six-month limit suggested in the EU Quality Framework for Traineeships. Lengths beyond that recommended maximum have been observed also in Bosnia and Herzegovina, particularly in measures targeting university graduates, though ALMP-based internships' length remains in line with labour legislation and related regulations. While on-the-job training is typically short-term, its overall duration still depends on ALMP design, and OJT may continue for quite some time via subsequent subsidised employment in more complex arrangements.

Gaps in visibility and transparency remain. Albania does not systematically advertise internship and OJT openings, and the report from North Macedonia highlights limited promotion of traineeship opportunities, especially by large companies active under ALMPs, even though the ESARNM conducts relevant promotion activities regularly. The transparency gaps in Bosnia and Herzegovina are more structural in nature. For instance, BiH shows a systemic lack of publicity for vacancies, and its participation calls demonstrate quite limited disclosure of the training content, learning objectives, and work conditions.

Monitoring and evaluation are not yet applied consistently. Kosovo exhibits variable monitoring quality; Montenegro introduced self-evaluation only recently, so this has yet to mature; the monitoring and evaluation practices in Bosnia and Herzegovina are largely confined to administrative exercises, without much systematic assessment of ALMPs' impact on employment outcomes; and Serbia still lacks a dedicated traineeship law that could supply comprehensive foundations for quality assurance. In addition, opportunities for cross-border mobility, a recognised EU priority, are absent in all six countries.

3.4.3 Potential ways forward

The comparative assessment of WBL in ALMPs sheds light on encouraging progress but also on persistent shortcomings that constrain these policies' transformation potential. While formalisation through contracts, basic protection for the parties involved, and at least nascent assessment are in place, structural gaps remain. The programmes' quality, equity, and impact must be guaranteed.

Based on the comparative analysis, the following recommendations articulate possible ways to strengthen quality, fairness, and impact in ways that support closer alignment with EU quality standards.

1. **Strengthen the learning dimension of WBL under ALMPs.** Programmes with a WBL component stand to benefit from clearly stated learning objectives, well-structured training plans, and designation of specific mentors or supervisors, all communicated to trainees. Monitoring these as learning progresses should further help placements support meaningful skills development rather than merely short-term work experience.
2. **Improve recognition and validation of the learning outcomes.** The countries could expand their use of certificates, attestations, and OJ modular or partial qualifications linked to national qualification frameworks. Also, recognition of prior learning could serve more systematically to validate competencies acquired through work-based learning and improve their transferability in the labour market.
3. **Ensure fairer, more transparent compensation arrangements.** Allowances, compensation, and the cost-sharing arrangements between public-service entities and employers could be rendered clearer and more consistent across programmes. This should facilitate fully equitable access for members of disadvantaged groups and make participation more attractive for both potential learners and employers.
4. **Improve transparency and access to information.** More systematically publicising vacancies and publishing details of the associated eligibility criteria, learning content, work conditions, compensation, and insurance coverage would create greater transparency. Thus, public employment services and other implementers would support informed participation, equal access, and stronger trust in the programmes' quality.
5. **Strengthen monitoring, evaluation, and use of evidence.** Monitoring systems could move further beyond administrative box-ticking by incorporating regular self-assessment, follow-up on learners, tracer studies, and analysis of employment results. This would aid in assessing effectiveness, identifying areas for improvement, and adjusting programme design on the basis of solid evidence.
6. **Align programme duration more closely with EU quality standards.** While most programmes adhere to the recommended six-month maximum, those that exceed it could be reviewed for sound justification. Fuller alignment with the EU Quality Framework for Traineeships should help reduce the risk of misusing programmes and strengthen WBL's learning and transition functions.
7. **Support employers' delivery of high-quality WBL opportunities.** Employers, especially SMEs, could benefit from both financial and non-financial support for offering structured learning, valuable mentoring, and fair work conditions. Guidance tools, model agreements, and capacity-building could assist in enhancing programme quality and encourage wider employer engagement.
8. **Promote region-level co-operation and gradual convergence with EU frameworks.** Given the region's shared labour-market and demographic challenges, joint efforts to cultivate peer learning; joint experimentation; and collaboration on quality assurance, recognition mechanisms, financing, and mobility could add substantial value. Closer dovetailing with EU frameworks would also support the candidate and potential-candidate countries' wider reform and integration processes.

ANNEXES

Annex 1: Detailed Criteria of the European Framework for Quality and Effective Apprenticeships (2018)

Criterion	Explanation
Learning and Working Conditions	
1. Written agreement	Sets out rights and obligations of apprentice, employer, and training institution.
2. Learning outcomes	Apprenticeship programmes are based on agreed, comprehensive learning outcomes.
3. Pedagogical support	Adequate support provided by qualified in-company trainers and vocational teachers.
4. Workplace component	At least half of apprenticeship duration must be spent in a workplace setting.
5. Pay and/or compensation	Apprentices should receive pay or other compensation for their work.
6. Social protection	Apprentices are entitled to social protection, including insurance coverage.
7. Work, health and safety	Workplaces must comply with relevant work, health, and safety regulations.
Framework Conditions	
8. Regulatory framework	National frameworks must provide clear and consistent rules for apprenticeships.
9. Involvement of social partners	Employers' and workers' organisations participate in design, governance, and implementation.
10. Support for companies	Financial or non-financial support should be available, especially for SMEs.
11. Flexible pathways and mobility	Pathways allow recognition of prior learning, progression to further education, and mobility abroad.
12. Career guidance and awareness raising	Career guidance and awareness-raising activities increase attractiveness of apprenticeships.
13. Transparency	Apprenticeship opportunities should be visible and accessible via national labour market agencies.
14. Quality assurance and tracking of apprentices	Quality measures include monitoring graduate employment and career development.

Source: OJEU (C153/2018)

Annex 2: Terminology Used in the Report

Concept(s)	The report's terminology
Training, trainee, and traineeship ¹¹	The term 'training' denotes the learning activities provided within an ALMP context, while 'trainee' refers to a learner participating in such activities. The latter includes learners engaged in WBL and/or beneficiaries of ALMPs that comprise a WBL component. Accordingly, the term 'traineeship' too is connected with ALMPs (not least in the reference framework laid out in Table 1.1). Consequently, even where a country report refers to a programme as an internship, the Report avoids the designation 'intern'.
Participants in the labour market: the labour force	The labour market comprises employed persons (individuals who have a job) and unemployed persons (individuals without a job who are actively seeking employment, irrespective of the intensity of their job search). The unemployment rate is calculated as the number of unemployed persons divided by the total size of the labour force¹². Hence, unemployment-rate calculations exclude individuals who are not part of the labour force. The economically inactive population consists mainly of individuals not legally allowed to work (such as children below a set minimal working age) and those unavailable for work (typically retirees and people engaged in full-time education or training).
Independent worker	Wherever the report uses the term 'independent worker' (which is done mainly in relation to Serbia and Montenegro¹³), it denotes a person who works without supervision by a line manager or senior worker, not a form of self-employment. The notion does not represent a distinct legal category. Rather, it reflects the intended outcome of internship-type arrangements – namely, obtaining the ability to perform work tasks independently.
Unemployed persons vs. jobseekers	The 'unemployed persons' and 'jobseekers' categories do not completely overlap.¹⁴ All unemployed people are jobseekers by definition, however difficult it may be to judge whether they are actively seeking work; in contrast, not all jobseekers are unemployed, as some people look for a new job while already in an employment relationship. This distinction is not applied in the country reports: all six apply the terms 'unemployment' and 'job search' interchangeably. The same approach is adopted here, since active labour-market policies generally target unemployed people seeking work.
Certification and qualification	For EU purposes, a qualification is defined as the formal outcome of an assessment and validation process whereby a competent body confirms that an individual has achieved specified learning outcomes¹⁵. It may also refer to the document certifying this accomplishment. The Report uses 'qualification' and 'certification' interchangeably. The term 'certification' can also refer to the procedure leading to a qualification; hence, it may denote both the process and its outcome, the granting of a qualification.
Knowledge, skills, and competencies	At EU level, knowledge, skills, and competencies are defined as learning outcomes reflecting what a learner knows, understands, and is able to do after completing a

¹¹ The Bosnia and Herzegovina country report employs the term 'traineeship', rather than 'internship', throughout. This reflects the national legal terminology and related concepts, which link such arrangements primarily to one's first entry to employment. The analysis accounted for the BiH approach via adjustments to align with the Report's framework.

¹² Labour force (also called the economically active population or workforce) refers to all persons of working age who are either employed or unemployed. It excludes people who are economically inactive, such as those who are neither working nor actively seeking and available for work.

¹³ "Independent worker" in Serbia clearly means a worker working without supervision of a line manager or senior worker, and not self-employment. In Montenegro, the term "independent work" is also used but not so clearly defined. Nevertheless, from the context, it seems clear that it also means working without supervision. In Bosnia and Herzegovina, the term refers to the ability of a trainee to perform work tasks with a certain degree of autonomy, without continuous or direct supervision, while remaining within a structured framework of professional oversight, typically acquired through internship and/or required for taking a professional exam.

¹⁴ Unemployed people not searching for a job are out of the labour force (economically inactive). See for example ILO definitions available at: <https://www.ilo.org/resource/labour-force>

¹⁵ See the EU definition available at: <https://esco.ec.europa.eu/en/classification/qualifications>

Concept(s)	The report's terminology
	learning process. In the context of WBL, these outcomes include learning done in the workplace. This usage acknowledges that applying practical skills often requires both theoretical and occupational knowledge, the latter being trade-specific and frequently best developed through workplace learning with the support of experienced workers or tutors. Accordingly, where the Report refers to 'skills', the term should be understood as encompassing knowledge, skills, and competencies acquired through WBL in the context of ALMPs.

ACRONYMS

General acronyms and initialisms

ALMM	Active labour-market measures
ALMP	Active labour-market policy
CVET	Continuing vocational education and training
CVTS	Continuing vocational-training survey
EaFA	European Alliance for Apprenticeships
EFQEA	European Framework for Quality and Effective Apprenticeship
EPALE	Electronic Platform for Adult Learning in Europe
EQAVET	European Quality Assurance in Vocational Education and Training
EQFT	European Quality Framework for Traineeships
ESF	European Social Fund
ETF	European Training Foundation
EU	European Union
ICT	Information and communication technology
ILO	International Labour Organization
IPA	Instrument for Pre-accession Assistance
IVET	Initial vocational education and training
NEET	‘Not in education, employment, or training’
NQF	National qualifications framework
OECD	Organisation for Economic Co-operation and Development
PES	Public employment service

PISA	Programme for International Student Assessment
RPL	Recognition of Prior Learning
SME	Small and medium-sized enterprise
TVET	Technical and vocational education and training
UNDP	United Nations Development Programme
UNICEF	United Nations International Children's Emergency Fund
VET	Vocational education and training
WBL	Work-based learning
YG	Youth Guarantee

Albania

AQF	Albanian Qualification Framework
INSTAT	Albanian Institute of Statistics
NESA	National Employment and Skills Agency

Bosnia and Herzegovina

BiH	Bosnia and Herzegovina
LFS	Labour Force Survey

Kosovo

EARK	Employment Agency of the Republic of Kosovo
ITP	Individual training plan
KIESA	Kosovo Investment and Enterprise Support Agency

North Macedonia

ESARNM	Employment Service Agency of the Republic of North Macedonia
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SSO	State Statistics Office
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Montenegro

NEC	National Education Council
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Serbia

NES	National Employment Service
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PROAE	'Publicly Recognised Organizer of Adult Education'
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SORS	Statistical Office of the Republic of Serbia
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