



TECHNICAL RECOMMENDATIONS

(NATIONAL MODEL)

International Organization for Migration

TECHNICAL ASSISTANCE TO SUSTAIN A LEARNING NETWORK AND SCALE LABOUR MARKET INCLUSION
OF NEWCOMERS IN THE NETHERLANDS



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This document consolidates technical recommendations that have been drawn up in the context of the LEARN project commissioned by the Programme for an Inclusive Labour Market (VIA) of the Ministry of Social Affairs and Employment in the Netherlands. The recommendations are based on an analysis by IOM that draws on activities within the context of the LEARN project, as well as supplementary input from a diverse group of stakeholders and desk research.

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Abbreviation list

Abbreviation	Definition
IOM	International Organization for Migration
LEARN	EU-funded project carried out by the International Organization for Migration, commissioned by the Ministry of Social Affairs and Employment and funded by DG REFORM vis the Technical Support Instrument
OCW	Ministry of Education, Culture and Science
P-wet SER	Participation Act Economic and Social Council – institutionalized advisors to the Dutch government
Stakeholders	All persons who contributed to project LEARN, including the participants and advisors of the Learning Network, persons who provided feedback on the draft document, and other stakeholders who made a relevant contribution to this project.
Stakeholders in the sounding board group for permit holders	When reference is made to the "sounding board group permit holders", this refers to the specific group of permit holders who acted as a sounding board within the LEARN project. Also referred to as the Migrant Ambassador Advisory Board.
SZW	Ministry of Social Affairs and Employment
UAF	University Asylum Fund
UVB	Policy Implementation Department within the Ministry of Social Affairs and Employment
VIA	Programme for an Inclusive Labour Market within the Ministry of Social Affairs and Employment
VNG	The Association of Dutch Municipalities
VWN	Refugee Council the Netherlands
Wi2013	Civic Integration Act 2013
Wi2021	Civic Integration Act 2021

Executive Summary

Project [LEARN](#) aims to provide technical support to facilitate a Learning Network and promote the labour market inclusion of permit holders in the Netherlands. [The project is](#) funded by the European Commission (DG REFORM) through the Technical Support Instrument and implemented by the International Organization for Migration (IOM) in close coordination with the Ministry of Social Affairs and Employment (SZW). The outcomes of this project have been analysed by IOM and form the basis for the results presented in this document. These results have been further developed into technical recommendations.

These technical recommendations illustrate the systemic obstacles to the labour market inclusion of permit holders in the Netherlands, and highlight what the Dutch government could do to address these obstacles, thus creating more favourable conditions for practitioners and other stakeholders to set up and scale up sustainable work-study programmes for permit holders.

The following recommendations are clustered around six key themes: Perception of Permit Holders, National Knowledge Structure, Participation and Civic Integration, Support Professionals Social Domain, Funding, and Modular Education.

Perception of permit holders

Ethnicity is still too often a factor shaping permit holders' opportunities on the labour market, especially for persons with a non-Western migration background even in cases of equivalence concerning qualifications, knowledge and skills. The former not only affects access to jobs and internships, but also access to professional mobility opportunities and greater reliance on social benefits and for longer periods of time. As a result, persons with a non-Western migration background have fewer opportunities on the labour market than people without a migration background, especially in economically difficult times. This applies to an even greater extent to newcomers.

Stakeholders indicate that some employers do not consider permit holders as a group holding professional potential and skills, even despite witnessing skills and labour shortages in several sectors. Negative views on, or unfamiliarity with, permit holders are also mentioned as an impeding factor by the sounding board group for permit holders within the LEARN project. Employer ambassadors are employers and entrepreneurs who have demonstrable success in sustainably employing and training permit holders. Employer ambassadors represent various (shortage) sectors and company sizes, in order to appeal to as many employers as possible. Employers who have positive experiences with permit holders are best placed to inform and enthuse other employers. In addition to connecting with diversity and inclusion efforts, it is also important that the employer ambassadors address employers' considerations with regard to the language level of permit holders.

The use of employer ambassadors is an additional instrument to the existing support for employers. It is expected that employer ambassadors will strengthen and safeguard the existing support.

National Knowledge Structure

Stakeholders have indicated that knowledge about the effective elements of work-study programmes for permit holders is fragmented across the professional field. In the Netherlands, various knowledge structures contribute to the provision of information about learning and working for permit holders.

Pooling knowledge through a national knowledge structure is important to prevent stakeholders from having to constantly 'reinvent the wheel'. A centralized knowledge structure could support the setting up and scaling up work-study programmes for permit holders in a more efficient manner, optimizing

the time and costs involved in these efforts. It is therefore expected that a national knowledge structure for permit holders will contribute to more favorable conditions for stakeholders in setting up and scaling up work-study programmes for permit holders. In the Workplan 2024 – 2026, IOM makes several proposals for the concrete implementation of such a structure.

Participation and civic integration

In the Netherlands, participation refers to the principle that everyone participates in society to the best of their ability and provides for their own livelihood as much as possible. Civic integration refers to the social, economic and cultural integration of newcomers. These concepts are relevant as both pertain to the labour market inclusion of permit holders in the Netherlands. Participation and civic integration are carried out in a decentralized manner in the Netherlands. This means that municipalities partly give substance to the implementation of the Civic Integration Act 2013 and 2021 (Wi2013 and Wi2021) and the Participation Act (P-act). Because municipalities are responsible for the implementation of the Civic Integration Act 2021 and the Participation Act, the idea is that they can integrate this policy. Municipalities have various instruments at their disposal to give substance to the participation component of civic integration.

A possible side effect of a better combination of participation and integration is a more equitable distribution of opportunities among permit holders as it is expected that by concretizing participation in civic integration, the government will further promote municipal cooperation. IOM proposes an assessment framework as a tool to support the complex decision-making process by authorized implementers, such as municipal councils, managers, and policy officers.

Support Professionals in the Social Domain

Professionals in the social domain that work with the target group of permit holders face unique challenges. Stakeholders are highly aware of the level of responsibility of executive professionals, because in practice it appears that crucial decisions are often made by the executive professionals. This complex situation can result in a lack of knowledge and a limited network of the professional, which is a bottleneck for the setting up and scaling up work-study programs for permit holders. Stakeholders and the sounding board group permit holders indicate that skilled professionals who are familiar with the target group of permit holders, are aware of local (and regional) labour market developments and who hold the same position for a long time are needed as reliable partners who should be involved in the set up or scale up of work-study programmes. IOM proposes the setting up of guidelines for professionals in the social domain.

Funding

Irregular funding leads to uncertainty for practitioners involved in the setting up or scaling up of work-study programmes. At national, regional and local level, various resources are available to implementers to co-finance work-study programmes for permit holders. Stakeholders indicate that the supply of financial resources is fragmented, and that the subsidy landscape is difficult to navigate. Implementers often lack the capacity and resources to raise financial resources. This emphasizes the need for continuous and accessible funding for work-study programmes, so that implementers and other stakeholders can set them up and scale them up.

Modular Education

Stakeholders indicate that a modular educational offer would help them in setting up and scaling up work-study programmes for permit holders. Many permit holders have already gained practical experience and theoretical knowledge in their country of origin and benefit more from following modules or partial certificates than from multi-year regular vocational training. In many cases, regular

vocational education does not meet the needs of permit holders. It is important that work-study programmes are conceived comprehensively and coherently including various components (integration, language, education, and participation) that overlap and reinforce one another. More flexibility in the offer of education available to permit holders makes it possible for implementers to offer education in their work-study programmes that is tailor-made for the participant (the permit holder) and fits in well with the other components.

PROJECT LEARN

Project [LEARN](#), fully funded by the European Commission (DG REFORM) through the Technical Support Instrument and implemented by the International Organization for Migration (IOM) in close coordination with the Ministry of Social Affairs and Employment (SZW), aims to provide technical support to facilitate a Learning Network and promote the labour market inclusion of permit holders in the Netherlands. This project runs from June 2022 to July 2024 and takes a three-pronged approach:

- 1. Learning Network "Learning and Working for Permit holders":** IOM facilitates the Learning Network in close cooperation with the Ministry of Social Affairs and Employment and the European Union. Various meetings and workshops are organized to promote knowledge sharing between the participants of the Learning Network and to further develop the expertise of practitioners who are responsible for setting up and scaling up work-study programs for permit holders in the Netherlands. The Learning Network strives to be a community of like-minded frontrunners consisting of employers, educational institutions, and municipalities. However, the Learning Network encompasses more than just this core group. During the project, IOM also consulted an 'outer shell', consisting of other experts (such as the University Asylum Fund (UAF), the Dutch Council for Refugees, Refugee Talent Hub, the Social and Economic Council (SER), etc., for valuable input in the content of the meetings. This group is called the Advisory Group. Work-study programmes are an integral combination of learning and working, lead to certification, have an emphasis on senior secondary vocational education (MBO) and lead to sustainable employment. This network focuses specifically on the effective elements of work-study programmes for permit holders and includes three main themes:
 1. Recruitment, selection, and transition process
 2. The learning component of work-study programmes
 3. The work component of work-study programmes

The findings of this Learning Network form the core of Project LEARN.

- 2. Migrant Ambassador Advisory Board:** IOM is setting up a sounding board group, where (former) permit holders make their voices heard and share experiences to promote the inclusion of permit holders on the Dutch labour market. By actively collecting input from the target group, IOM gains a better understanding of the challenges and opportunities that permit holders encounter and their position in Dutch society.
- 3. Technical recommendations and guidelines:** IOM formulates [recommendations](#) aimed at the national government, the implementation of which is expected to create more favourable conditions for setting up and applying work-study programmes more widely in the Netherlands. In addition, IOM develops guidelines to make the knowledge gained about scaling up and making work-study programmes more sustainable and accessible to practitioners in the construction sector.

In March 2023, during the LEARN project, SZW presented the [Plan of Action 'permit holders to work'](#) in which concrete actions and collaborations are identified to improve the labour market opportunities and participation of permit holders. The role of Learning Networks in improving labour market opportunities for permit holders is also specifically emphasized in the Action Plan. Furthermore, the Action Plan will be referenced in the rest of this document as it synergizes with project LEARN and this deliverable.

METHODOLOGY

This document refers to [stakeholders](#). [Stakeholders](#) are all persons who have contributed to project LEARN, including the participants and advisors of the Learning Network, persons who have provided feedback on the draft document, and other stakeholders who have made a relevant contribution to this project. Moreover, when reference is made to the [sounding board group permit holders](#), this refers to the specific group of permit holders that acted as a sounding board within the LEARN project (see E).

The [recommendations](#) for the Ministry of Social Affairs and Employment (SZW) presented in this document, are based on data collected by the International Organization for Migration (IOM) between November 2022 and April 2024 during several activities, regarding the bottlenecks and challenges experienced by implementers in the field of labour market inclusion of permit holders when setting up and scaling up work-study programmes in the Netherlands. Such activities include the following:

A. LEARN project kick-off meeting

On 3 November 2022, IOM, together with the Policy Implementation Department (UvB) within SZW, organized a kick-off meeting at the Jaarbeurs in Utrecht in which participants from the Learning Network and the Advisory Group provided input on four different themes regarding the labour market inclusion of permit holders in the Netherlands:

1. Matching, recruitment, selection, and transition process
2. LEARNING & working: the educational component in the work-study programme
3. Learning & WORKING: the work component in the work-study programme
4. Arriving at a national plan: directing and scaling up work-study programmes

The findings of this meeting have been transcribed and processed in a report, which can be found in the deliverable: In-depth Report Kick-off.

B. 10 Learning Network Learning and Working for Permit holders meetings

The Learning Network 'Learning and Working for Permit holders' aimed to develop a sustainable approach to setting up and widely applying (scaling up) work-study programmes for permit holders. This network was led by the Ministry of Social Affairs and Employment in collaboration with IOM. UVB is responsible for the coordination and facilitation, while IOM focuses on the substantive program. The network consists of about 25 participants from municipalities, schools and employers, as well as an additional layer of committed advisors.

An important focus of the network is on knowledge exchange, collaborative learning and sustainability of efforts. This has led to valuable new collaborations and an active community that intends to stay in touch for future collaborations. Continuity from within the organization is crucial here.

During the Learning Network meetings, consisting of work visits or workshops, participants exchanged knowledge, built up their capacity and broadened their network. The following topics were discussed during these meetings:

- Recruitment and selection
- Expectation management
- Conditions

- Transition process
- Language and curriculum
- Accompaniment
- Inclusion in the workplace
- Integration connection
- Hands-on learning.

Transversal themes such as governance, project coordination and policy cut across all topics and were discussed at every meeting.

The interaction between the various groups of participants, including employers, educational institutions, municipalities and representatives of the Ministry of Social Affairs and Employment, has resulted in new insights. During these meetings, not only bottlenecks were discussed, but also actively worked to find solutions. Moreover, valuable connections have been established between the participants, which has led to collaborations that contribute positively to the labour market inclusion of permit holders.

During all 10 meetings, IOM transcribed and analysed the findings, which were incorporated into meeting reports – which can be found in the document "Workshop Reports". The meetings of the Learning Network have provided essential insights that serve as a basis for the policy recommendations. For an overview of all meetings, see [Appendix A](#).

C. 40 individual consultations

IOM held 40 one-hour conversations with stakeholders in the field of labour market inclusion of permit holders in order to further explore specific themes and gain a better understanding of the landscape of all stakeholders within the domain of labour market inclusion of permit holders. Examples are various employers, municipalities and non-governmental organizations such as the Refugee Council the Netherlands or Refugee Talent Hub the Netherlands. For an overview of all stakeholders who were interviewed, see [Appendix B](#). The interviews have been transcribed and processed in reports by IOM. The findings are compiled in the document "Consolidated Inventory Report".

D. International Exchange

As part of LEARN, IOM organized two exchanges to learn from experiences in other EU Member States. In November 2023, a physical study trip to Essen, Germany, took place, which lasted three days. During this trip, the learning network not only visited various Organizations, but was also invited to listen to various speakers, including representatives of the Chamber of Commerce, Salam's Kitchen (a restaurant that works with permit holders), Klinikum Vest (hospital), the Bundesagentur für Arbeit and the Jobcenter.

In addition, in March 2024, a virtual study visit to Sweden took place. During this virtual visit, several speakers from Sweden were invited, including representatives from the Swedish Migration Agency, the Swedish Employment Agency and a remarkable project called Yrkesväg, to share their insights.

These exchanges served as an opportunity for an exchange between the participants of the Learning Network and the stakeholders of the representative country. The findings of both exchanges have been compiled, analysed, and incorporated into the "Regional Exchange Report".

E. Sounding board group Permit holders (MAAB)

Because project LEARN is ultimately about the target group itself, permit holders, IOM has integrated their perspectives into all phases of the project to gain a deeper understanding of the opportunities and challenges that permit holders face during work-study programmes. During three rounds of consultations, with a duration of 90 minutes per session, IOM consulted nine representatives of the target group. This was made possible by setting up a Migrant Ambassador Advisory Board (MAAB), where (former) permit holders shared their insights and experiences to promote the labour market integration of permit holders in the Netherlands. The engagement of the target group was crucial for the Learning Network and LEARN, as their perspectives and experiences form the basis of effective policymaking.

During these sessions, IOM compiled all the findings and incorporated analyses of the minutes into the *MAAB Minutes* report.

F. Literature review

Before, during and after the above activities, IOM conducted a literature review of existing policies and other relevant literature. The aim of the literature review was to effectively position the recommendations in this document. That is, the recommendations are intended to build on recommendations and studies that are already in place. The literature review also formed the basis for the kick-off meeting, the Learning Network meetings, and the individual consultation sessions.

G. Testing with the field

In August 2023, two 90-minute stock taking sessions took place where the ideas and the structure of the proceeds were presented to representatives of the Ministry of Social Affairs and Employment and advisors of the Learning Network. They were asked for input on other relevant directions of thought. During these sessions, IOM took minutes and incorporated analyses of these minutes into the *Taking Stock Sessions Minutes* report.

In March and April 2024, the results were tested with 26 stakeholders, including a mixed group of municipalities, educational institutions, non-governmental organizations and employers, for their relevance and practical applicability by requesting their input on a draft version of this document. This input has been incorporated into the final version of this document. A second round of feedback also took place, during which certain chapters of the document were sent to stakeholders with follow-up questions. This was done to verify that their opinions and feedback had been correctly incorporated into the document. For an overview of all stakeholders who have contributed to this, see [Appendix C](#).

All data collected and analysed through the above activities form the basis for this document.

SCOPE

This chapter describes the scope of the [recommendations](#).

LEARN contributes to a more inclusive labour market by reflecting on and collecting signals from the field on various aspects of work-study programmes for permit holders. Municipalities, employers, and educational institutions exchange knowledge about and contribute to making work-study programmes more widely applicable. The starting point of LEARN, as well as of this document, is work-study programmes for permit holders.

Work-study programmes are integrated programmes that consist of various components that overlap and reinforce each other: a preparatory programme (optional), language component, qualifying education, work, guidance, and aftercare. During work-study programmes, the emphasis is on developing the skills needed for successful integration into the labour market. Skills cover soft and hard skills, competencies, and knowledge related to a profession or occupation. This includes not only job-specific skills, but also soft skills such as communication, teamwork and problem-solving. The aim of work-study programmes is to support participants in increasing their chances on the labour market, so that they are better able to secure a sustainable position in the labour market.

Permit holders are asylum seekers who have been recognized as refugees and have received a Dutch residence permit, which gives them the right to live and work in the Netherlands. Permit holders are sometimes also referred to as newcomers.

Permit holders bring talents and experience that are not always recognised as such due to language barriers and limitations related to skill validation processes. The Dutch labour market thus often requires additional training. In March 2018, the Ministry of Social Affairs and Employment (SZW) launched the programme [for an Inclusive Labour Market \(VIA\)](#) with the aim of improving the labour market integration of permit holders. Within this programme, eight pilots investigated different measures that could contribute to such goal. One of the pilots, the Learning and Working pilot, tested the effectiveness and application of work-study programmes. In this context, SZW worked together with municipalities, educational institutions, and employers. According to SZW, work-study programmes contribute to sustainable participation as permit holders can gain practical experience and relevant work-related language skills, while employers have the opportunity to fill vacancies in shortage sectors through such programmes.

At the request of the Ministry of Social Affairs and Employment, and so as to focus on a vulnerable target group where the needs for an intervention are most urgent¹, LEARN has limited itself to work-study programmes for permit holders at Secondary vocational education [middelbaar beroepsonderwijs (MBO)] levels 1-4 that are aimed at paid work.

The [Civic Integration Act 2021](#) has dual integration programmes as its point of departure. The legislator defines dual integration programmes as programmes in which language learning is combined with participation. The insights gained based on the aforementioned VIA pilots are therefore relevant for the use of work-study programmes in the new civic integration system. In the [Explanatory Memorandum to the Civic Integration Act 2021](#), the Ministry of Social Affairs and Employment also indicates that the programme responsible for civic integration works closely with [the programme for an Inclusive Labour Market \(VIA\)](#) to promote the creation of dual integration programmes.

¹ See the problem analysis for an elaboration.

PROBLEM ANALYSIS

In the [letter to the House of Representatives on the elaboration of the Plan of Action for Permit holders at Work](#), the Minister for Social Affairs and Employment (SZW) writes that some favorable developments can be observed with regard to permit holders at work. In 2023, the dependency on social assistance among permit holders was 55.1 percent, 3.2 percentage points lower than in 2022. According to the Minister, this decrease is mainly due to the fact that more permit holders are working and the extension of the working week for part-timers. Because permit holders with a part-time job work more hours, there is less need to rely on a supplementary income, which reduces their dependency on social assistance benefits. An increase in labour participation can also be observed for all cohort years of permit holders since 2014. This means that the average participation rate of those who entered in 2014, 2015, 2016, etc. is rising. After the dip in the COVID-19 period, an upward trend in the labour participation of permit holders was noted. The abolition of the 24-week requirement for asylum seekers is also a positive development.² Part of the group of asylum seekers is a future permit holder, earlier participation thus increases their later labour market opportunities.

Nevertheless, the unemployment rate of permit holders is considerably higher than the national average. Moreover, permit holders often work on temporary or flexible contracts and the work often does not match their qualifications. Language and cultural barriers, together with a lack of appropriate diplomas, relevant work experience and knowledge of the Dutch labour market, are often causes for this lagging participation. Permit holders also often have less knowledge of the Dutch institutions that can assist them, and their social network is often more limited.³ Finally, permit holders (and other people with a migration background or language deficiency) are particularly vulnerable to changes in the labour market (cyclical changes or external crises such as the COVID-19 pandemic) due to their weak position on the labour market. This emphasizes the importance of a sustainable position in the labour market.⁴

Since the increase in asylum inflows in 2015, many target group-oriented initiatives and policies have been developed by the national government and local authorities to achieve a sustainable position on the labour market for permit holders. These target group-oriented efforts are in line with previous recommendations⁵ and are a break with the prevailing idea that the position of permit holders (and other people with a migration background and/or facing language barriers) could only be influenced through general policy. In recent years, evaluation research has also been carried out regarding these initiatives and policies aimed at permit holders.⁶ This research has mostly focused on the course of the implementation and the identification of effective elements and has yielded relevant insights on the design and implementation of these efforts.

² The government is adjusting the rules for asylum seekers who want to work, after the Council of State ruled that the 24-week requirement violates the European Reception Directive. Asylum seekers are allowed to work more than 24 weeks a year if their asylum application has been pending for at least six months. For more info see: Government of the Netherlands. (2023, November 29). Asylum seekers are allowed to work more than 24 weeks a year. Retrieved from <https://www.rijksoverheid.nl/actueel/nieuws/2023/11/29/asielzoekers-mogen-meer-dan-24-weken-per-jaar-werken>

³ Ministry of Social Affairs and Employment. (2023, July 11). Letter to the House of Representatives on the elaboration of the action plan for Permit holders at work (Parliamentary Paper no. 2023Z13456). Retrieved from <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/07/11/kamerbrief-uitwerking-plan-van-aanpak-statushouders-aan-het-werk>

⁴ Ministry of Social Affairs and Employment. (2018). Work Agenda for Further Integration in the Labor Market. Page 12.

⁵ Scientific Council for Government Policy (WRR). (2015). No time to lose: from reception to integration of asylum migrants (WRR Policy Brief no. 4). Retrieved from <https://www.wrr.nl/publicaties/policy-briefs/2015/12/16/geen-tijd-verliezen-van-opvang-naar-integratie-van-asielmigranten>

⁶ Ministry of Social Affairs and Employment. (2021, November 17). Research pilots of the Further Integration in the Labor Market (VIA) programme. Retrieved from <https://www.rijksoverheid.nl/documenten/publicaties/2021/11/17/onderzoek-pilots-programma-verdere-integratie-op-de-arbeidsmarkt-via>

However, there are indications that these efforts have mainly reached permit holders who are perceived to have more promising labour market integration outcomes. For example, men and those with a higher level of education seem to have received more support than those with lower levels of education, people with health problems, youth and women.⁷ However, the share of permit holders without a basic qualification is larger than the number of higher educated permit holders. There is currently insufficient supply of public services, especially for the large group of people with a lower level of education, people without education or people with low literacy levels.⁸ It is tempting for implementers to focus on the *quick gains*: the permit holders who can make the step to work relatively easily and quickly. However, this creates the risk that a significant group with a lot of (work) potential will remain sidelined. More support and tailor-made solutions are needed for these groups, which is only likely to pay off in the medium term in terms of an increase in labour market participation.

All in all, this shows that the labour participation of permit holders, especially those particularly vulnerable, is a major challenge. In addition to the bottlenecks that to a greater or lesser extent also apply to other target groups facing labour market integration challenges – language and cultural barriers, lack of suitable diplomas, relevant work experience and knowledge of the Dutch labour market – some obstacles are specific to permit holders (e.g. trauma, adverse consequences of the reception period and the lack of social networks at the outset), which hinder their integration during (the first years of) the stay in the Netherlands.

Various studies commissioned by the government have shown that work-study programmes are an effective way to guide permit holders to a sustainable place in the labour market.⁹ Work-study programmes contribute also to the participation component of the civic integration trajectory permit holders must fulfill. In the Netherlands, in response to the increased task of permit holders, many work-study programmes for permit holders have been set up in recent years. However, many of these initiatives are struggling to become more sustainable or to scale up, even though there is a demand for them (see Box 1). Implementers (municipalities, employers, and educational institutions) experience systemic obstacles in their attempts to set up, make sustainable or scale up work-study programmes.

Box 1 The potential of work-study programmes for permit holders

The potential of work-study programmes for permit holders

Municipalities face increased demand for services for permit holders including work-study programmes. For example, the number of residence permits granted in the first half of 2022 was higher than the total number of permits granted in 2018, 2019 or 2020, which is in line with the high inflow of asylum seekers from 2021 onwards. In 2021, the SER already calculated that, with the necessary caution, work-study programmes for some **75 thousand permit holders** could be a suitable intervention.¹⁰

⁷ Dagevos, J., Schans, D., & Uiters, E. (2021). In progress: An analysis of the policy aimed at permit holders and what is needed to improve this policy (Social and Cultural Planning Office). Page 17.

⁸ UWV. (2021). Promising occupations: National overview of occupations with sufficient to good job opportunities, December. Retrieved from www.werk.nl/imagesdxa/kansrijke_beroeven_december2021_tcm95-434993.pdf

⁹ Ministry of Social Affairs and Employment. (2021). Work Agenda for Further Integration in the Labor Market. Page 12. Ministry of Social Affairs and Employment. (2021, November 17). Research pilots of the Further Integration in the Labor Market (VIA) programme. Retrieved from <https://www.rijksoverheid.nl/documenten/publicaties/2021/11/17/onderzoek-pilots-programma-verdere-integratie-op-de-arbeidsmarkt-via>

¹⁰ SER & Ministry of Social Affairs and Employment. (2021). Knowledge document on work-study programmes for people with a migration background in practice: an inventory of the upscaling possibilities. Page 29.

TECHNICAL RECOMMENDATIONS

All data collected during the activities of project LEARN have been analysed by the International Organization for Migration (IOM) and form the basis for the results in this document. These results have been further developed by IOM into [technical recommendations](#).¹¹

This section will further discuss the systemic obstacles to the labour market inclusion of permit holders in the Netherlands and what the government can do to remove these obstacles and thus create more favourable conditions for practitioners and other stakeholders to set up and scale up sustainable work-study programmes for permit holders.

The recommendations are clustered around the following themes:

- Perception of Permit Holders
- National Knowledge Structure
- Participation and Civic Integration
- Support Professionals Social Domain
- Funding
- Modular Education

Perception of permit holders

In the [Work Agenda for an Inclusive Labour Market \(VIA\)](#), the Ministry of Social Affairs and Employment (SZW) emphasizes that in the Netherlands, ethnicity is still too often decisive for opportunities on the labour market. In cases of having equal qualifications, knowledge and skills, people with a non-Western migration background are demonstrably more likely to get turned down for jobs or internships. They have fewer opportunities to move up and are dependent on social benefits more often and for longer. As a result, despite their diversity, they have fewer opportunities on the labour market than people without a migration background, especially in economically difficult times.¹² According to VIA, this applies to an even greater extent to newcomers.^{13,14}

A national survey conducted by the University of Groningen in 2020 on behalf of the Scientific Research and Documentation Centre (WODC) shows that some opinions about asylum policy and asylum seekers have become more negative.¹⁵ In 2017, 38 percent of the Dutch were negative about the asylum reception policy; in February 2019 this was 43 percent. The arrival of asylum seekers is fueling concerns about housing and Dutch identity. In 2017, 59 percent were somewhat concerned about this; in 2019, this was 63 percent.

In 2022, IOM Netherlands commissioned Ipsos, a Dutch research firm, to conduct a survey with over a thousand respondents on their perceptions of refugees. Although a majority of respondents (59 percent) agreed that refugees need help when they come to the Netherlands, 41 percent claimed that

¹¹ See the Methodology section for more information on how the recommendations were developed

¹² Ministry of Social Affairs and Employment. (2021). Work Agenda for Further Integration into the Labor Market. Page 2.

¹³ See footnote 13

¹⁴ VIA uses the term newcomer and permit holder interchangeably. In the rest of the document, IOM refers to permit holders

¹⁵ WODC. (2020, January 17). Views on migration: Hospitable but also discontent and social unrest. Retrieved from <https://www.wodc.nl/actueel/nieuws/2020/01/17/opvattingen-over-migratie-gastvrij-maar-ook-ongenoege-en-maatschappelijke-onrust>

refugees did not contribute to the Dutch economy. 42 percent believed that refugees make the Netherlands less safe and rely heavily in national social services.¹⁶

The fact that these views on refugees and asylum seekers also have an effect on the (labour market) position of permit holders is confirmed by stakeholders in the [LEARN project](#).¹⁷ Stakeholders indicate that bias against permit holders can lead to discriminatory practices during recruitment and selection, in the workplace and influence further professional advancement. Permit holders tend to be aware of how they are perceived in society. For example, the sounding board group permit holders (MAAB, part of the LEARN project) indicates that the discrimination and exclusion they experience not only reduce their chances on the labour market, but also have a negative impact on their motivation and mental well-being.

Much of the policy in recent years has mainly focused on empowering permit holders, by learning the Dutch language and increasing their social networks. These aspects are relevant, also in the eyes of permit holders themselves, but the emphasis also shows a one-sided perspective focused on the individuals, on permit holders. It is also important to remove structural barriers. Policies aimed at greater inclusion among employers, but also of educational and healthcare institutions, for example, should also be part of integration policy.¹⁹ In this context, for example, the [Association of Dutch Municipalities](#) (VNG) argued for a coherent policy in which attention is not only paid to permit holders, but also to promoting support among implementing organizations and residents.²⁰ In short, inclusion is a two-way process involving the host societies and migrants and policy and practice should consider both individual and structural matters and empower both permit holders, institutions and communities.

In the parliamentary letter on Equal Opportunities Development Agenda of 27 May 2024, Minister Van Gennip (SZW) informs the House of Representatives about the Draft Decree on Monitoring Equal Opportunities in Recruitment and Selection. She then explains how she reached initial agreements with employers and employers' organisations to continue working on equal opportunities on the labour market.²¹

Employer ambassadors

Stakeholders indicate that some employers do not consider permit holders as a group holding professional potential and skills, even despite witnessing skills and labour shortages in several sectors. In other cases, employers are not willing to hire or train permit holders. In part, this has to do with an employer weighing the risks they take. Many employers deal with high workloads due to labour shortages and often do not have the capacity to recruit or invest in permit holders. In addition, lack of familiarity with the procedures and regulations regarding the hiring of permit holders also plays a role.

¹⁶ Moving the Middle: How do we activate the movable middle? Ipsos (2022). Explanation by Ipsos: The 1045 respondents were selected as a representative sample of the Dutch population. The representation of gender, age and other demographic factors remained representative and the same, reflecting the average composition of the Dutch population.

¹⁷ Stakeholders of project LEARN refers to all stakeholders from the field, i.e. actors who are directly or indirectly involved in setting up or scaling up work-study programmes for permit holders, whom IOM Retrieved between November 2022 and March 2024. This includes the advisors and participants of the Learning Network Learning and Working for Permit holders as well as other stakeholders who are not part of the Learning Network. **In the rest of the document, they are referred to as 'stakeholders'**

¹⁸ The data on which the aforementioned figures are based does not differentiate between regions. Those involved in the LEARN project indicate that views on permit holders differ per region or local context.

¹⁹ Dagevos, J., Schans, D., & Uiters, E. (2021). In progress: An analysis of the policy aimed at permit holders and what is needed to improve this policy. Netherlands Institute for Social Research. Pages 19 and 22.

²⁰ Association of Netherlands Municipalities (VNG). (2021). An integrated approach from reception to integration. Retrieved from: <https://vng.nl/sites/default/files/2021-09/een-integrale-benadering-van-opvang-tot-integratie.pdf>

²¹ Ministerie van Sociale Zaken en Werkgelegenheid. (2024, 27 mei). Kamerbrief over Ontwikkelagenda gelijke kansen. Geraadpleegd van <https://www.rijksoverheid.nl/documenten/kamerstukken/2024/05/27/kamerbrief-ontwikkelagenda-gelijke-kansen>

Employers often do not know what steps they need to take or what support is available when hiring permit holders. This can lead to reluctance to hire permit holders on the part of employers, even if permit holders are potentially suitable labour force. This lack of knowledge and support can lead to missed opportunities for both employers and permit holders. This is especially true for small and medium-sized enterprises (SMEs).

Negative views, bias or limited exposure to diversity and permit holders are also mentioned as an impeding factor by stakeholders and the sounding board group for permit holders within the LEARN project. In some cases, an employer has had a negative experience with a permit holder and this experience makes the employer reluctant to hire a permit holder in the future. In other cases, an employer has negative views about the target group from the outset.

Employers who have positive experiences with permit holders are best placed to inform and encourage other employers. Stakeholders emphasize that it is important to create support at all levels, not only the top management or HR managers, but also managers and colleagues on the workplace level. Stakeholders also emphasize the importance of clearly explaining why a target group-specific approach is chosen, creating support is most effective when it is emphasized that the investments needed to train and employ permit holders also benefit other (vulnerable) target groups.²² Many employers are striving for more diversity and inclusion. As an example, the Charter Document Permit holders and Work, the result of a collaboration between Diversity in Business (SER) and Refugeetalenthub, uses practical examples to show how hiring and training permit holders strengthens and promotes this commitment of employers to more diversity and inclusion.

In addition to connecting with diversity and inclusion efforts, it is also important that the employer ambassadors address employers' considerations with regard to the language proficiency of permit holders. Stakeholders indicate that many employers are reluctant to hire permit holders without sufficient language proficiency. This is despite the fact that work-study programmes are an opportunity for permit holders to improve their language skills. Finally, it is worthwhile to take stock of employers' experiences with other non-native speakers (e.g. Ukrainian displaced persons and Eastern European labour migrants). Lessons learned with regard to other target groups may also apply to the target group of permit holders.

The government also plays a role in promoting a more positive and nuanced image of permit holders. The Ministry of Social Affairs and Employment's [Plan of Action for Permit holders at Work](#), for example, is a target group-specific approach aimed at further supporting employers in providing extra guidance in the workplace and promoting the coordination of initiatives at the regional level through the regional connectors.²³

Employer ambassadors are employers and entrepreneurs who have demonstrable success in sustainably employing and training permit holders. Employer ambassadors represent various (shortage) sectors and company sizes, in order to appeal to as many employers as possible. In the long term,

²² SER Diversity in Business. (2022). Charter document Permit holders and Work: A Practical Guide for Employers. Page 8.

²³ With the goal of guiding more permit holders towards sustainable employment, the Ministry of Social Affairs and Employment wrote a letter to parliament outlining an action plan in the summer of 2023, <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/03/09/plan-van-aanpak-statushouders-aan-het-werk> <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/07/11/kamerbrief-uitwerking-plan-van-aanpak-statushouders-aan-het-werk> including a role for regional connectors. This is a role/function in which people will explore which projects and initiatives are running in this area, which ones work well and how they can be scaled up, and they create new opportunities for permit holders. To fulfil this role, the central municipalities of the 35 labor market regions receive a budget through a decentralisation allowance. To connect the regional connectors, Divosa has set up a learning network. Within this, the exchange of information, knowledge and experiences takes place and people learn from and with each other in terms of process, method and content.

employers who receive subsidies under the subsidy scheme 'permit holders at work' will also be potential ambassadors. Finally, it is important to link the employer ambassadors to the regional connectors, so that they can pool their knowledge and experience and refer each other to forums where they can share their positive experiences.

Stakeholders indicate that when the Ministry of Social Affairs and Employment actively strives to promote a more positive perception and to provide nuanced information, the reach of the support for employers as planned in the Plan of Action for Permit holders can be broadened and deepened. In this way, support is likely to spread beyond employers who are already aware of and willing to recruit permit holders and who already recognize the added value of employing permit holders. Employer ambassadors can, therefore, become important agents to further support employers. It is expected that employer ambassadors will strengthen and safeguard the existing support.

National Knowledge Structure

Stakeholders have indicated that knowledge about the effective elements of work-study programmes for permit holders is fragmented across the professional field. In the Work Agenda for an Inclusive Labour Market (VIA), the Ministry of Social Affairs and Employment (SZW) takes on the role of ensuring that 'the infrastructure for combined learning and working in the Netherlands is used optimally'.²⁴ Within the labour market regions, it is expected that the regional connectors will contribute to the coordination of initiatives and to the pooling of knowledge specifically with regard to permit holders. The structural exchange between regional connectors^{25,26}, facilitated by Divosa²⁷, also promotes exchange between the labour market regions. However, stakeholders indicate a need for a central, national point where they are provided with accessible and reliable information.

Various knowledge structures contribute to the provision of information about learning and working for permit holders. Since 2012, the Programme Council has been supporting²⁸ the 35 labour market regions. The Programme Council is committed to a broad target group and has the ambition to 'increase the sustainable employability of vulnerable job seekers and workers by means of development, learning and appropriate support'.²⁹ The Programme Council website offers various tools to support professionals in the social domain in the field of learning and working.

In 2016, the Ministry of Social Affairs and Employment mandated the Social and Economic Council (SER) to develop a website that offers practical tools for employers who want to hire refugees. The website, [Werkwijzer Vluchtelingen](#), bundles knowledge to support stakeholders involved in the labour market integration of permit holders.

In June 2023, at the request of the Ministry of Social Affairs and Employment, the International Organization for Migration (IOM) set out what the Ministry and relevant stakeholders can do in the period 2024 – 2026 to make the Learning Network Learning and Working for Permit holders more sustainable. One of IOM's recommendations with regard to making the Learning Network more sustainable was that the Ministry of Social Affairs and Employment should take the lead in creating a broad, national knowledge structure in order to safeguard the knowledge of the Learning Network and make it accessible to other relevant stakeholders. IOM stressed the importance of not creating a new structure, but of seeking synergies by making the best use of the existing infrastructure and linking initiatives.³⁰

In concrete terms, this means that by promoting the cooperation between, among others, the Programme Council, the Refugee Work Guide, the regional connectors as well as other relevant knowledge structures, the existing diverse expertise, and experiences in the field of labour market inclusion of permit holders in the Netherlands will be bundled. Such aggregation allows practitioners

²⁴ Ministry of Social Affairs and Employment. (2021). Work Agenda for Further Integration in the Labor Market. Page 12.

²⁵ See footnote 16

²⁶ It is important to recognize that the role of a regional connector can be interpreted differently from region to region. This can range from a person who does this task on the side to someone who focuses specifically on this role. The variability in the interpretation of the role can affect the effectiveness of regional connectors. In addition, the financial resources for this role often go to the central municipality, which can make smaller municipalities more vulnerable. It is important to take this into account and to ensure that all municipalities involved are equally supported in fulfilling their role as regional connectors. Past experience has shown that the role of regional connector can quickly fade, especially in situations where there is a high level of staff turnover. It is therefore essential to ensure the continuity and stability of the role, regardless of any changes in staff composition.

²⁷ Divosa. (n.d.). Retrieved from <https://www.divosa.nl/>

²⁸ The Regional Labor Market Programme Council consists of VNG, UWV, DIVOSA and Cedris

²⁹ Together for the customer. (n.d.). Long-term plan 2023-2024. Page 16. Retrieved from <https://www.samenvoorderklant.nl/sites/default/files/bestandsbijlage/Meerjarenplan%202023-2024%20openbaar.pdf>

³⁰ See Project LEARN Deliverable Workplan 2024 – 2026 in which IOM explains how this advice can be put into practice

and other stakeholders to coordinate overlapping efforts and share best practices and effective elements with each other.

Smaller or more remote municipalities indicate a need for an overview of existing knowledge, partly because they do not have the resources and volume of residents to organize long-term projects. A national knowledge structure acts as a central point of contact that provides reliable support to practitioners in the field. It is therefore important that the management of such a knowledge structure is entrusted to an executive body. A national knowledge structure can also function as a development and accountability structure.

Pooling knowledge through a national knowledge structure is important to prevent stakeholders from having to constantly reinvent the wheel. Without a knowledge structure, there is a risk that setting up and scaling up work-study programmes for permit holders will take an unnecessarily long time and become unnecessarily expensive. It is therefore expected that a national knowledge structure for permit holders will contribute to more favorable conditions for stakeholders in setting up and scaling up work-study programmes for permit holders.

In the Workplan 2024 – 2026, IOM makes several proposals for the concrete implementation of such a structure.³¹

Box 2 Good example

Good example: NETZWERK Unternehmen integrieren Flüchtlinge

[NETZWERK Unternehmen integrieren Flüchtlinge](#) is an initiative of the German Chamber of Commerce and Industry (DIHK), funded by the German Federal Ministry of Economic Affairs and Climate Protection. It is a membership-based platform that offers services to German employers who want to hire permit holders. There are currently 3580 members, most of which are small and medium-sized enterprises. The website also provides reliable and accessible information for other relevant stakeholders.

³¹ See footnote 21

Participation and civic integration

In the Netherlands, participation refers to the principle that everyone participates in society to the best of their ability and provides for their own livelihood as much as possible. Civic integration refers to the social, economic and cultural integration of newcomers. These concepts are relevant as both pertain to the labour market inclusion of permit holders in the Netherlands. Participation and civic integration are carried out in a decentralized manner in the Netherlands. This means that municipalities partly give substance to the implementation of the [Civic Integration Act 2013 and 2021](#) (Wi2013 and Wi2021)³² and the [Participation Act \(P-act\)](#)³³.

In the Netherlands, anyone who is able to work but cannot make it on the labour market without support is covered by the P-act. On 1 January 2015, the P-Act replaced the Work and Social Assistance Act (WWB), the Social Employment Act (Wsw) and a large part of the Young Disabled Persons (Disability Provision) Act (Wajong). The basic principle of the Participation Act is that everyone participates in society to the best of their ability and provides for their own livelihood as much as possible. The main purpose of the P-Act is to guide as many capable people as possible towards employment or to support them in their employment. Paid work is preferred, but if this is not possible, it can also be voluntary work.

The P-act should also ensure that everyone has an income, including those who are unable to provide for themselves. The P-act provides an income or a supplement to the income up to the applicable social minimum. There is only a right to social assistance benefits if there is no other existing statutory scheme. In the P-act, social assistance benefits are intended as a last resort safety net.

Benefit recipients are also obliged, insofar as they are not exempt, to be available for investigations into the possibilities of employment and to be available for reintegration programmes. These can range from additional education or training, to participation places (working while retaining benefits) to subsidizing employers through wage cost subsidies. It is also possible to perform sheltered work in which the municipality or a joint institution takes over the employer relationship.

As far as integration is concerned, two systems exist side by side: the Wi2013 and the Wi2021. The Wi2013 emphasizes the responsibility of the permit holder to choose an appropriate language offer.

Municipalities come into the picture if there is also an assistance benefit under the Participation Act. In practice, the municipality mainly focuses on guiding permit holders to the labour market because they often do not succeed without help. Within the Wi2013, the municipality is not allowed to engage in integration support. Not being able to combine support from the municipality under both laws was widely recognized by the field and policymakers as ineffective and as such led to the reform of the Integration Act 2013 to the Integration Act 2021.³⁴

Under the Wi2021, the responsibility for support with civic integration is (again) transferred to the municipality. Under the new law, municipalities are responsible for developing local policies, within the frameworks of the new law, and for providing support to permit holders regarding their civic integration. Frameworks therein are: Municipalities conduct a Broad Intake with all persons with a duty

³² The civic integration system has changed. Municipalities now play an important role in helping newcomers who are required to complete the civic integration programme. The civic integration programme is not mandatory for everyone who is new to the Netherlands. This depends on someone's current citizenship status and other factors.

³³ The Dutch Participation Act (Participatiewet, in Dutch) has been drawn up to guarantee everybody's right to access to work, to make sure that work-disabled people also can find a job.

³⁴ Dagevos, J., Schans, D., & Uiters, E. (2021). In progress: An analysis of the policy aimed at permit holders and what is needed to improve this policy. Page 11.

of civic integration and draw up a personal Plan for Integration and Participation (PIP). Ideally, under the new Act, civic integration should already start in the asylum seekers' centre, thus creating continuity from reception centres through to municipalities. Fixed contact persons are appointed at the municipality (a client manager or consultant).

There are major differences within the group of permit holders: a differentiated group therefore requires differentiation in policy. That is why there are three 'learning routes':

- **B1 route:** Aimed at passing the language components of the integration exams at B1 level.
- **Z-route:** If it is not expected to be possible to reach B1 level within three years, one can follow the Z-route. The focus of the Z-route is on improving Dutch language skills as much as possible within three years and participation in various forms of social participation.
- **Education route:** The main goal of the education route is to prepare as quickly as possible for entering a 'regular (vocational) programme' by following both 'thematic lessons' and Dutch language lessons at B1 level. The education route falls outside the scope of this document and will not be discussed further.

In the Explanatory Memorandum to the Wi2021, the legislator stipulates that duality, combining language learning and participation, is an important sub-goal of the new system. Section 1.3.5 stipulates that both components are part of all learning routes and that this is further strengthened by the PVT³⁵ and the MAP³⁶. The legislator indicates that the participation component within the B1 route can be implemented in different ways and that this will be laid down in the PIP together with the permit holder. This can be part of the civic integration trajectory, in combination with language, or can be organized separately by the municipality. Those who are required to integrate in the Z-route are required to spend at least 800 hours on activation and participation and the other components of the integration obligation (PVT and MAP). The offer in the Z-route must focus on the Dutch language, self-reliance, activation and participation, including paid work, voluntary work, internship, job orientation and job guidance. Municipalities can also focus having permit holders participate in activities in areas such as finance, health and building a social network that stimulates speaking the Dutch language and participation.

Under the Wi2021, the MAP replaces the ONA trajectory. Within the MAP, participation in the labour market is central and the person who is required to integrate maps out their own competences and employment opportunities. This is combined with gaining at least 40 hours of practical experience on the (local) labour market.

Because municipalities are responsible for the implementation of the Civic Integration Act 2021 and the Participation Act, the idea is that they can integrate this policy. Moreover, the decentralized nature of the Participation Act and the Civic Integration Act makes it possible to vary this integration of policy locally and to adapt it to the local context. The legislator has deliberately opted for this decentralized character because municipalities are closest to the citizen and therefore the expectation is that municipalities are best able to provide tailor-made services.³⁷

³⁵ The Participation Statement Process (PVT) is a mandatory part of the civic integration process and is part of the personal Integration and Participation Plan (PIP). Those who are required to integrate are introduced to the core values of Dutch society and sign a participation statement.

³⁶ The purpose of the Module Labor Market and Participation (MAP) is to familiarize and prepare civic integration participants in the B1 and Z route for participation in the Dutch labor market.

³⁷ Official Announcements. (n.d.). Parliamentary Paper 35483-3. Retrieved from <https://zoek.officielebekendmakingen.nl/kst-35483-3.html>

Monitor of the functioning and development of the civic integration market shows that participation as part of the Z-route has been achieved in three-quarters of the municipalities, and that this offer is still under development in one-fifth of the municipalities. In view of the number of hours of participation (800 hours) that the person integrating must meet within the set civic integration period of three years, it is important, according to Significant, that this offer is developed in a timely manner.³⁸

Under the P-Act, municipalities have various instruments at their disposal to give substance to the participation component of civic integration. These instruments include additional education or training, participation places, wage cost subsidies and sheltered work. However, stakeholders indicate that it is not sufficiently clear what participation means within the civic integration process and how important participation in the form of paid work is *in addition to* the aforementioned learning routes. Moreover, practice shows that these instruments are not always used, because eventually some command of Dutch is expected (by employers). In this way, there is no combination of language learning and participation, but language becomes a prerequisite for participation in participatory activities.³⁹

A possible side effect of a better combination of participation and integration is a more equitable distribution of opportunities among permit holders. Permit holders have little or no say as to in which municipality they are placed in after they have been granted a residence permit. Due to differences in policy, budget, location, and political affiliation, among other things, some municipalities have more and better opportunities for some permit holders than others. In theory, the Central Reception of Asylum Seekers (COA) takes into account permit holders' prospects and opportunities to build a new life and contribute to society when directing them to a municipality, also known as [kansrijke koppeling](#). In practice, however, the implementation of the *kansrijke koppeling* appears to be rather complex.⁴⁰

Finally, the municipal task for permit holders has increased in recent years. For example, the number of residence permits granted in the first half of 2022 is higher than that of the whole of 2018, 2019 or 2020, which is in line with the high inflow of asylum seekers from 2021 onwards.⁴¹ On the one hand, this means that there is more volume for parties to set up and scale up work-study programmes. On the other hand, this increase in caseload may mean that the scale and weight of the problems outlined will increase.

It is also expected that by concretizing participation in civic integration, the government will further promote municipal cooperation.⁴² The central government has appointed regional connectors to promote more municipal cooperation (at the regional level). By addressing the above bottlenecks, it is expected that the central government will be able to make the regional connectors even better able to contribute to more municipal cooperation.

Box 3 Good example

³⁸ Zwanepol, M., Onstenk, A., van der Laan, S., van der Maas, G., Huisman, M., & Blom, M. (2022). Monitor the functioning and development of the integration market. First measurement – 2022. Utrecht: Significant. Page 7.

³⁹ De Gruijter, M., Kool, T., & Dusault, Y. (2023). KIS-Monitor 2023. Municipal policy on employment guidance and integration of permit holders and family migrants. Utrecht: KIS. Page 9.

⁴⁰ Dagevos, J., Schans, D., & Uiters, E. (2021). *In progress An analysis of the policy aimed at permit holders and what is needed to improve this policy*. Netherlands Institute for Social Research. Page 9.

⁴¹ *Cohort study asylum seekers and permit holders*, Asylum and Integration, SCP. (2023). Retrieved from <https://longreads.cbs.nl/asielenintegratie-2023/statushouders-huisvesting-en-integratie/>

⁴² In the Explanatory Memorandum, the legislator explicitly states that it has not included an obligation for municipal cooperation in the Wi2021 because, according to the legislator, the integration system contains sufficient incentives for cooperation between municipalities. The legislator does consider it desirable that the Minister of Social Affairs and Employment has the possibility to intervene interadministratively in the event of neglect of duties by the Municipal Executive, for example when it comes to providing appropriate and timely offers for those who are required to integrate.

Good example: Labour market region Northeast Brabant

Success factors for work-study programmes in [the Northeast Brabant Labour Market Region \(NOB\)](#) is the long-standing collaboration between municipalities, UWV, Social Development Companies, Language Providers, Educational Institutions, job coach parties, Employers and the Leerwerkloket and WSP team. All municipalities in NOB adhere to the same methods. For the permit holder, it thus does not matter in which municipality he or she is located. In addition, this guarantees continuous learning trajectories on a regional scale.

An assessment framework is a tool to support the complex decision-making process by authorized implementers. Authorized implementers are mainly client managers or consultants at municipalities, but also other actors involved in the decision-making process, such as municipal councils, managers, and policy officers. As described above, the legislation on integration and participation allows for more local considerations. The assessment framework helps authorized implementers to make use of this discretion in a clear and traceable manner. The framework serves as a tool to arrive at substantiated and explainable decisions in a structured and transparent manner. The assessment framework can be further developed by the government, in collaboration with other relevant stakeholders such as the VNG, SAM, DIVOSA and experts by experience, possibly with a guide for use and practical examples.

Based on the input of stakeholders, the International Organization for Migration (IOM) suggests including at least the following elements in this assessment framework⁴³:

1. Minimum criteria for participation

In recent years, several innovations have taken place in the provision of vocational education (for adults), including in the context of Lifelong Learning (LLO). Practice has shown that these educational innovations are well suited to the learning and participation needs of permit holders because of their flexible nature. The sectoral development paths (see box 3) that are currently under development, for example, offer potential for the implementation of the participation component of civic integration.

⁴³ Participation is a broader concept than just work-study programmes. However, the scope of this document is limited to work-study programmes for permit holders. The proposals made by IOM are therefore exclusively the result of the experience of those involved, mainly in the implementation of work-study programmes.

Sectoral development paths

Sectoral development paths are pathways that promote the lateral entry and professional advancement of job seekers (with a distance to the labour market). A development path consists of successive functions linked to existing and new parts of vocational education courses: practical experience statements and certificates.

On a development path, job seekers develop step by step, through parts of training courses (partial certificate or practical experience statement), but mostly in practice. The sectoral development paths are part of the government's approach to fill shortages and aim to reduce the mismatch between employers and jobseekers who are at a distance from the labour market.

The government has prioritized the childcare sector, followed by other sectors: technology/construction/energy (energy fixer), healthcare, education, green sector, facilities and logistics. SZW is the driving force and initiator, but the ownership of each development path lies with the trade associations.

2. Sustainable employment

Sustainability is often mentioned when it comes to permit holders at work. For example, several government documents refer to 'a (sustainable and suitable) job' or 'sustainable work'.⁴⁴ However, neither the P-Act nor the Civic Integration Laws 2013 and 2021 provide a definition of sustainability.^{45,46} Moreover, the only 'official' definition dates from 2008 and relates to sustainable outflow from social assistance benefits: 'if the client does not have to apply for benefits again within six months'.⁴⁷

The lack of a clear, official definition of sustainability that relates to benefits and participation (in this case, work-study programmes) can be a bottleneck for stakeholders in setting up and scaling up work-study programmes for permit holders. For example, stakeholders indicate that the lack of a clear definition sometimes leads to municipalities interpreting sustainability in such a way that it results in choices that are contrary to the interests of the permit holder and those of the employer.⁴⁸ In these cases, this is an obstacle to the inflow into work-study programmes.⁴⁹ It often comes down to the executive professional to weigh the obligation to provide civic integration education against participation through paid work. Stakeholders indicate that there are cases where a permit holder has had to give up her or his job because of her or his obligations under the civic integration because the executive professional places more emphasis on the requirements of the Civic Integration Act than those of the P-act.

3. Instruments P-act as a means to achieve sustainable participation and promote ownership

⁴⁴ Ministry of Social Affairs and Employment. (2023). Elaboration of the Plan of Action for Permit holders at Work. . Page 3.

⁴⁵ wetten.overheid.nl. (2024). Civic Integration Act. Retrieved 11 April 2024 from <https://wetten.overheid.nl/BWBR0015703/2024-01-01/0>

⁴⁶ wetten.overheid.nl. (2023). Civic Integration Decision. Retrieved 11 April 2024 from <https://wetten.overheid.nl/BWBR0044770/2023-01-01>

⁴⁷ Sustainability outflow WWB, Work and Income Inspectorate. (2008). Page 12. Retrieved from <https://zoek.officielebekendmakingen.nl/kst-29544-178-b10.pdf>

⁴⁸ How can we improve the inflow of permit holders into suitable and sustainable work?, Bakker, L., & de Bell, L. (2023). Retrieved from <https://sociaalweb.nl/nieuws/hoe-kunnen-we-de-instroom-van-statushouders-naar-passend-en-duurzaam-werk-verbeteren/>

⁴⁹ Ditto footnote 53

Under the P-act, municipalities have various instruments at their disposal to give substance to the participation component of civic integration: additional education or training, participation places, wage cost subsidies and sheltered work are among these instruments. An instrument often mentioned by stakeholders is to allow permit holders entitled to benefits to retain their benefits in the event of a trial placement of a maximum of 2 months, which can be extended by a maximum of 4 months. During this trial placement, no wages are paid by the employer and the permit holder retains her/his benefit. However, many municipalities have few (financial) resources at their disposal, which means that they have to set priorities and, in some cases, do not benefit in the short term from having benefits retained. Targets that consultants or client managers have to get a certain number of clients out of benefits per year also sometimes play a role. Stakeholders indicate that it is not uncommon for a municipality to encourage a permit holder to get out of the benefit in the short term instead of participating sustainably in the long term.

Stakeholders indicate that in some cases the use of retention of benefits is necessary for a permit holder to be able to participate in a work-study programme. The choice of a municipality not to allow the retention of benefits can be an obstacle for a permit holder to participate in a work-study programme. Lack of inflow (participation) is an obstacle for other implementers to set up and scale up work-study programmes.

At the same time, stakeholders indicate that one of the conditions for scaling up work-study programmes for permit holders is that all stakeholders are willing to invest in the permit holder (guidance, work experience placement and education).⁵⁰ This willingness to invest also applies to the employer concerned.

4. Participation and integration

Stakeholders indicate that the inflow of permit holders, especially those from the Z-route, to work-study programmes is often hampered by excessive language requirements. This can lead to language proficiency becoming a condition for participation, while in the context of civic integration, work-study programmes (and other participation activities) function as a means of learning the language and participating at the same time (see box 4).

⁵⁰ For a good basis, it is also important that the other preconditions, such as available childcare and reimbursements for travel expenses, are put in order

Good example: the dual work-study programme Language and Hospitality Utrecht

[The dual learning programme Language and Hospitality Utrecht](#)⁵¹ is an initiative of the Colour Kitchen, Queridon, the Municipality of Utrecht and Compass. At catering locations and in the Queridon language school in Utrecht, a broad target group with a distance to the labour market, including a growing number of permit holders, participates in work-study programs in which integration, language lessons and integration of professional language in the lessons are integrally combined with learning and development in the workplace, in order to help participants grow step by step towards sustainable paid work.

In the first year (phases 1, 2 and 3) the focus is on language and integration and in the second year (phases 4, 5 and 6) the focus is on vocational training and placement. The shift in focus takes place gradually: integration is regressive and participation progressive. The results of the process were very positive, especially with permit holders from the Z-route. The dual work-study programme Language and Hospitality Utrecht is therefore considered a *best practice* with regard to integration, participation and civic integration and the involvement of the target group with a (learning) or language deficiency (e.g. permit holders from the Z-route).

In addition, stakeholders indicate a need for more flexibility with regard to the hours of Dutch that are used during participation (participation in the work-study programme).

Finally, under the P-act, a quid pro quo is expected from benefit recipients (permit holders). This concerns 'the obligation to perform unremunerated socially useful work to the best of one's ability, in addition to regular work and which does not lead to displacement on the labour market'. Stakeholders indicate that civic integration activities could count as a quid pro quo in the P-act. Civic integration activities can also be seen as an activity useful to society. By explaining this further, the national government could further support municipalities in the effective integration of the two laws.

⁵¹ A report of a working visit by the Learning Network to the trajectory on 22 May 2023 can be provided by IOM on request

Support Professionals in the Social Domain

The work of professionals in the social domain⁵² concerned with permit holders is dynamic and presents unique challenges. As described earlier, unlike other target groups with low participation in the labour market, permit holders are subjected to both the Participation Act and the Civic Integration Act 2013 or 2021. The decentralized nature of both laws transfers their implementation to municipalities as well as the interpretation of and development of local policy. Stakeholders indicate that this entails significant responsibility for the executive professional, because in practice it appears that critical decisions are often made by the executive professional. In addition, professionals experience a high workload and a high staff turnover. Moreover, the two coexisting integration laws each have their own implications. Finally, a significant part of the work is new; the Civic Integration Act 2021 has been in force for two years at the time of writing. One stakeholder involved called working with permit holders a 'new profession'.

This complex situation can result in a lack of knowledge and a limited network of professionals, which is a bottleneck for the setting up and scaling up of work-study programs for permit holders. Stakeholders and the sounding board group permit holders indicate that skilled professionals who are familiar with the target group of permit holders, are aware of local (and regional) labour market developments and who hold the same position for a sustained amount of time are needed as reliable partners with whom to set up or scale up work-study programmes.

1. Guideline for the support of professionals in the social domain

Stakeholders indicate that there is a need for more support in the competence of professionals so that professionals are even better equipped to perform their work effectively.

In what follows and based on the input of stakeholders and the sounding board group for permit holders, IOM makes a few proposals for principles that can form part of such support. These proposals are a first step towards a structural approach to supporting professionals in the social domain. It is up to relevant stakeholders to further develop and implement the following.

- Intercultural competences

In many cases, a permit holder has a different cultural background than the professional who works with the permit holder. Stakeholders indicate that these cultural differences can lead to mutual misunderstanding. It is therefore important to further support the executive professional in developing intercultural competences. For example, supervisors can offer intercultural competences' training to their executive professionals or consider recruiting intercultural mediators to support executive professionals.

- Gender

As described earlier, the participation rate of female permit holders is lower than that of male permit holders. For example, when it comes to the employment of couples entitled to social assistance, the focus is often on men. In some cases, this is at the request of the couple. In the Netherlands, the pursuit of women's emancipation (gender equality) is enshrined in policy.⁵³ Stakeholders indicate that there are

⁵² Professionals in the social domain in the Netherlands refers to professionals that provide social services to Dutch citizens. In the case of this report professionals in the social domain refers to client managers and consultants that work at municipalities.

⁵³ <https://www.rijksoverheid.nl/onderwerpen/vrouwenemancipatie>

cases in which executive professionals have to weigh practical concerns and the wishes of (the) permit holder(s) themselves against the pursuit of gender equality. It is advisable to pay attention to this consideration in the guideline. It is moreover worthwhile to link intercultural competences to gender, in order to enable professionals to make their decisions in a clear and traceable way.

The lack of childcare places is also an obstacle to the participation of (single) female permit holders. The KIS Monitor 2022⁵⁴ emphasizes that municipalities can consider alternative forms of childcare, such as host family childcare or collective childcare. In addition, it is valuable to explore the possibilities of making alternatively scheduled education (early in the morning or evening schools) more accessible.

- Knowledge of the labour market

Finally, it is important that professionals are supported to strengthen their knowledge of the (local) labour market and the range of work-study programmes. Professionals can be supported also to access further opportunities to promote exchanges with other relevant stakeholders.

2. Guidelines for employing permit holders as competent professionals

Planned reforms of the Participation Act⁵⁵ underline the importance of involving ‘experts by experience’. Further expression can be given to this by drawing up a guideline on how municipalities can hire experts by experience (permit holders), for example, as client managers, with appropriate training and support.

Box 5 Good examples of training and hiring of (former) permit holders

Good examples:

- **BMC and OpenEmbassy train permit holders to become integration consultants**
BMC and OpenEmbassy are joining forces to train permit holders to become integration consultants, with whom they can share their own experiences and support newcomers during the integration process. This initiative makes use of the valuable knowledge of experts by experience and contributes to the integration of permit holders in the Netherlands. More information about this program can be found on the [BMC website](#).
- **Work-study programmes for permit holders at the municipality of Rotterdam**
In addition, the municipality of Rotterdam has set up successful work-study programmes to help permit holders find work and develop further. A striking example of this is the project in which 21 permit holders were hired as customer managers at the municipality of Rotterdam. These pathways not only offer employment to permit holders, but also contribute to reducing unemployment among this group and to a more positive image in society. For more information about these work-study programmes and how the municipality of Rotterdam helps permit holders with their integration and employment, please visit the [press release page](#) of the municipality of Rotterdam.

Both examples effectively illustrate how municipalities and other Organizations work together to give permit holders the opportunity to work for municipal authorities through apprenticeships, thereby

⁵⁴ Knowledge Platform Integration & Society (KIS). (2022). *Municipal Policy Monitor 2022*. Retrieved from <https://www.kis.nl/sites/default/files/2022-11/422151%20Monitor%20gemeentelijk%20beleid%202022.pdf>

⁵⁵ Ministry of Social Affairs and Employment. The Programme plan Participation Act in Balance outlines a large reform of the Participation act scheduled in 2024 and 2025. (2023). Programme plan Participation Act in Balance (page 44). Retrieved from <https://open.overheid.nl/documenten/7a065a41-28cb-45e8-b71e-390603d64c59/file>

not only increasing their own chances on the labour market, but also contributing to the services provided to other newcomers.

Both guidelines can be further developed by the government, in collaboration with other relevant stakeholders such as the VNG, SAM, DIVOSA and experts by experience, possibly accompanied with practical examples.

Digitalization

Stakeholders indicate a need for a more structural exchange of information between professionals in the social domain. For example, there are cases in which a permit holder has had several client managers in a short period of time and has therefore had to repeat his or her story several times. In addition, there are cases where appointments and other information are lost when transferring to a new client manager. IT innovations such as an e-portfolio can help to ensure that all information pertaining to the permit holder is transcribed and that this information is prevented from being lost ensuring continuity of service provision.

A centralized file management for permit holders and other individuals with a distance to the labour market, with the consent of stakeholders being required for the sharing of information between different professionals would not only improve the efficiency of the service, but also strengthen cooperation between different stakeholders and reduce the administrative burden.

Funding

In 2021, the SER indicated that the continuity of funding for learning-work programmes for permit holders is often not guaranteed.⁵⁶ This signal was echoed by stakeholders in 2023 and 2024: irregular funding leads to uncertainty for implementers involved in setting up or scaling up apprenticeship programmes. For example, stakeholders indicate that the funding for work-study programmes in which they were involved was only secured up until a month before their start. Other work-study programmes have been terminated prematurely due to lack of continuous funding.

At national, regional and local level, various resources are available to implementers to co-finance work-study programmes for permit holders. Stakeholders indicate that they finance the components of work-study programmes through municipal budgets, reintegration funds, other resources from the P-act, RMT funds, budgets of the work-study companies involved, budgets of involved employers or from relevant national and regional subsidies, among others. Stakeholders indicate that financing is fragmented, and that the subsidy landscape is difficult to navigate. Implementers often lack the capacity and resources to raise financial resources. This emphasizes the need for continuous and accessible funding for work-study programmes set up and scaling up, as well as their sustainability.

It is expected that the *Plan of action for permit holders at work* will make a positive contribution to this. For example, from September 2024, employers can apply for a subsidy for extra guidance of permit holders in the workplace aimed at reducing language and cultural barriers, and the regional connectors can help implementers at the regional level to secure funding.⁵⁷

In October 2023, the VNG indicated that it is pleased that more funding has been made available by the national government for guiding permit holders to participate in the labour market, because municipalities are striving for the full participation of permit holders.

Many stakeholders emphasize that participation programmes for permit holders are more intensive, longer in duration and more expensive than regular participation programs. Moreover, the current budgets do not correspond to the higher inflow of permit holders.

Stakeholders further indicate that it is important that the existing subsidies relevant to permit holders are properly coordinated. Ideally, stakeholders can use the subsidies in such a way that they lead to integrated arrangements for matters that are specific to permit holders, such as extra language lessons or guidance. There is also a need for oversight and accessibility of the available financial resources available for financing a work-study programme for permit holders.

Work-study programmes for permit holders are integrated arrangements that consist of various components – pre-transition programme, (language) education, work, guidance and aftercare – that overlap and reinforce one another. The obligations arising from the civic integration process when a permit holder already participates in a work-study programme and the obligations under the Participation Act should also be considered if a permit holder receives benefits. An integrated and coherent approach to such processes is a prerequisite for the success of a work-study programme as well as to scale up and expand work-study programmes more broadly.

⁵⁶ The Social and Economic Council (SER) and the Ministry of Social Affairs and Employment. (2021). Knowledge document on work-study programmes for people with a migration background in practice: an inventory of the upscaling possibilities. Pages 43 and 55.

⁵⁷ Government of the Netherlands. (2023). Plan of action permit holders at work. Retrieved <https://www.rijksoverheid.nl/documenten/kamerstukken/2023/03/09/plan-van-aanpak-statushouders-aan-het-werk>

Modular Education

Stakeholders indicate that an educational offer that is modular, i.e. education that consists of shorter-term modules for which learners obtain partial certificates, would help them in setting up and scaling up work-study programmes for permit holders. In many cases, regular vocational education does not meet the needs of permit holders. Regular vocational education in the Netherlands lasts multiple years and requires a learner to complete all modules to obtain a degree. Many permit holders, however, have already gained practical experience and theoretical knowledge in their country of origin, making many of the modules mandatory in regular vocational education redundant. Stakeholders indicate that permit holders would benefit from following short-term modules that lead to partial certificates to allow for more targeted learning instead.⁵⁸ Moreover, as mentioned earlier, for work-study programmes to be effective it is important that they form an integral arrangement of various components (civic integration, language, education, and participation) that overlap and reinforce one another. An increased availability of more flexible, modular forms of education allows implementers to offer work-study programmes that are tailor-made for the participant (the permit holder) and fit in well with the other components.

In recent years, several innovations have taken place in the provision of vocational education, including in the context of Lifelong Learning (LLO). In 2013, the Ministry of Education, Culture and Science (OCW) introduced the third learning pathway, the most important feature of which is that this form of non-subsidized education does not have a standard number of hours. This gives room to set up a form of education that matches individual needs and recognised prior experience and learning. Training in the third learning pathway is suitable for short-term upskilling and retraining. Moreover, training in the third learning pathway is often done in combination with a paid job.

Separate certificate programmes have also been introduced through which state-funded and private educational institutions can offer modular, labour market-relevant aspects of vocational education. These pathways can be concluded with a Secondary vocational education [Middelbaar beroepsopleiding (MBO)] certificate (also known as a partial certificate) recognized by the Ministry of Education, Culture and Science.

With a range of courses in the third learning pathway, vocational education institutions have more opportunities for a flexible range of education that suits the needs of permit holders. In general, programmes in the third learning pathway must meet the same criteria as the programmes in the Vocational Training Pathway (BOL) and Vocational Guidance Pathway (BBL).⁵⁹ However, in contrast to the regular courses, courses in the third learning pathway are not state funded. Stakeholders indicate that it is therefore often not possible to secure finances per capita for work-study programmes when considering the incorporation of courses in the third learning pathway. As such, they indicate that government funding for the third learning pathway would further enable the setting up and scaling up of work-study programmes for permit holders.

⁵⁸ For some permit holders, a theoretical education is better suited to their level. These recommendations are limited to work-study programmes MBO levels 1-4, see Scope.

⁵⁹ Regular vocational education in the Netherlands has two variants: BOL (vocational training pathway) and BBL (vocational accompanying pathway). BOL is more theoretical: students spend more hours in school. BBL is more practical: students spend more hours in school. Another difference is that BOL involves an unpaid apprenticeship as the work-component, whilst BBL involves a paid job placement as the work-component.

ATTACHMENTS

Appendix A. Learning Network Meetings

LEARNING NETWORK MEETINGS	No.	DATE	MEETING TYPE
	1	16/01/2023	Workshop Customer Journey Permit holder
	2	13/03/2023	Working visit Transition House Gelderland
	3	27/03/2023	Expectation Management Workshop
	4	08/05/2023	Panel theme 1: Recruitment, selection and transition trajectory
	5	22/05/2023	Working visit The Colour Kitchen & Queridon: practical learning and language level
	6	03/07/2023	Working visit IKEA
	7	04/09/2023	Workshop Financial Engineering
	8	09/10/2023	Working visit ProRail and workshop ARQ Trauma Centre
	9	30/10/2023	Workshop Practical Learning
10	22/01/2024	Working visit including group	

Appendix B. Individual Consultations

CONSULTATIONS	No.	DATE	ORGANIZATION
	1	21/11/2022	Randstad
	2	23/11/2022	ProRail
	3	28/11/2022	UAF
	4	29/11/2022	Municipality of Leiden
	5	30/11/2022	TheColourKitchen
	6	01/12/2022	SER
	7	07/12/2022	Refugee Talent Hub
	8	07/12/2022	Sigra
	9	12/12/2022	IW
	10	12/12/2022	Secondary vocational education Amersfoort [MBO (middelbaar beroepsonderwijs)] Amersfoort
	11	12/12/2022	SBB
	12	14/12/2022	Dutch Council for Refugees [VluchtelingenWerk Nederland]
	13	20/12/2022	We Technique 1st interview
	14	21/12/2022	Leerwerkloket Amersfoort [Learning and working Desk Amersfoort]
	15	22/12/2022	EmployersService Point [WerkgeversServicepunt] (WSP) Amersfoort
	16	23/01/2023	SCP Netherlands Institute for Social Research
	17	26/01/2023	FutureWorks
	18	07/03/2023	IKEA
	19	07/03/2023	Divosa
	20	14/03/2023	NOVA college Haarlem
	21	16/03/2023	Inclusief Group
	22	20/03/2023	Utrecht University of Applied Sciences
	23	21/03/2023	Care Guard [Zorgwacht]
	24	23/03/2023	Municipality of Hoeksche Waard
	25	26/04/2023	The Ministry of Social Affairs and Employment (SZW) – unit PDV
	26	09/05/2023	National Learning and Working Desk [Landelijk Leerwerkloket]
	27	10/05/2023	Green Housing Providers [Groene Huisvesters]
	28	26/05/2023	SVO Horeca training
	29	13/06/2023	Queridon
	30	15/06/2023	Divosa – Follow-up interview
	31	16/06/2023	SAM
	32	19/06/2023	Bouwmensen Apeldoorn
	33	20/06/2023	Zaffier / Municipality of Alkmaar
	34	21/06/2023	McDonalds Utrecht
	35	30/06/2023	Bouwmensen Apeldoorn – follow-up interview
	36	04/07/2023	Vebego
	37	26/07/2023	EmployersService Point [WerkgeversServicepunt] Learning and Working Desk WSP/ [Leerwerkloket Noord Oost Brabant]
	38	27/09/2023	We Technique 2nd interview
	39	16/01/2024	EmployersService Point [Werkgevers Service Punt] Learning and Working Desk WSP/ [Leerwerkloket Noord Oost Brabant] - follow-up interview
40	05/03/2024	NGO Culture in Harmony [NGO Cultuur in Harmonie]	

Appendix C. Testing with the Field

Testing the yields	No.	ORGANIZATION
	1	Netherlands Institute for Social Research (SCP)
	2	Municipality of Hoeksche Waard
	3	Dutch Council for Refugees [VluchtelingenWerk Nederland]
	4	Utrecht University of Applied Sciences
	5	DIVOSA
	6	DIVOSA
	7	DIVOSA
	8	SER
	9	SIGRA
	10	SIGRA
	11	Municipality of Amsterdam
	12	Zaffier
	13	Municipality of Leiden
	14	Inclusief Groep
	15	Inclusief Groep
	16	Inclusief Groep
	17	EmployersService Point North Brabant [WerkgeversServicepunt Noord Brabant]
	18	EmployersService Point North Brabant [WerkgeversServicepunt Noord Brabant]
	19	Kennemer Hart
	20	IW
	21	Leerwerkloket Amersfoort [Learning and working Desk Amersfoort]
	22	Leerwerkloket Amersfoort [Learning and working Desk Amersfoort]
	23	Open Embassy
	24	Open Embassy
	25	SAM
26	SAM	