



POLICY BRIEF

Digitalisation and labour migration: the use of modern technology, challenges and opportunities

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EXECUTIVE SUMMARY

Digitalisation has led to the development of new products, platforms and services, as well as fueled the demands of labour migrants for more information, training and online services. These changes can bring about efficiencies for the public sector by speeding up processes and freeing up employees' time. Digitalisation also represents an opportunity for countries to attract the best international talent, roll out e-government portals and educate citizens to ensure that they have the relevant digital skills to take advantage of the digital revolution underway while recognizing the skills and qualifications of third-country nationals. This Policy Brief explains the digital products and services available which facilitate labour migration, as well as the current barriers to the use of modern technology. This paper also analyses existing policy measures as well as looks at recommendations on how digitalisation can be leveraged to enable labour migration.

CURRENT CONTEXT

Migration for work reasons is one of the prominent forms of mobility, propelled by the ever-increasing wave of digitalisation. Such underlying labour market conditions as a shortage of workers (particularly in Europe), the continued globalisation of the economy and the demand for flexible arrangements have driven the need for digitalisation. In turn, the widespread adoption of digital tools, automation, and remote work capabilities has not only expanded opportunities for individuals to seek employment in different regions but has also reshaped the dynamics of work-related migration.

An increase in the **provision of labour migration information online and e-government services** across the Prague Process region aimed at supporting migrants has become one of the tangible outcomes of technological advancement. Examples include education services – particularly language courses – which have moved online, and, as a result, led to an increased availability of remote workers and a decrease in project costs. Countries such as Georgia, Kazakhstan and Tajikistan are strong here, in addition to EU Member States.

Migrant Resource Centres (MRCs) established to provide neutral information on labour migration to individuals in origin countries have also been making use of digital channels in their operations. MRCs have been established in Afghanistan, Bangladesh, Iraq, Pakistan, Sri Lanka and Tajikistan (soon also in Uzbekistan and Kyrgyzstan) and can provide e-services (consultations, language and vocational training online) to help people make informed decisions when considering to migrate for employment reasons. Their services cover pre-departure orientation (where applicable) and information on work and living conditions abroad, rights and obligations, access to protection mechanisms and information in destination countries. Counsellors increasingly provide consultations via social media and online platforms, as the digital component in their activities has been expanded over recent years.

Furthermore, an increasing number of migrants are finding their first **jobs through platforms** that filter candidates for knowledge and competencies and then match these individuals with clients, also in physically distant locations. The number of such **e-matching services**¹ has grown exponentially in recent years to include platforms like [Uber](#), [Wolt](#), [Just Eat](#), [Glovo](#) and [Bolt](#) for food delivery and ride-hailing jobs; [Distributed](#), [Nerdapp](#), [Topcoder](#) and [Ework](#) for talent with specific IT skills; [Appjobs](#), [Upwork](#) and [Fiverr](#) for individuals with a wider range of skills; as well as [TalentPools](#), [Sigma Software](#) and [EmployUkraine](#) for companies to find Ukrainian talent via digital means as a timely response mechanism to the war in Ukraine. Most platforms require as little as an internet connection, a smartphone or computer with an app for one to start earning money without the need to possess extensive local market language skills and qualifications or to undergo administrative procedures.

The *e-matching* services have had a significant impact on labour markets across Europe and Central Asia. Revenues from the platform economy in 2020 were estimated to be as high as EUR 20 billion. In the EU alone, there are more than 500 digital labour platforms and more than 28 million platform workers. In 2025, their number is expected to reach 43 million people.

In addition to matching services, there is an increasing demand for **online visa provisions**, so that migrants can work legally in destination countries, particularly since waiting times for visa issuance are significant across Europe and Central Asia. Through digitalisation, there is the desire to make visa application processes more secure and less vulnerable to theft and fraud, as well as easier for applicants. In the EU this can be witnessed in the adoption of the proposal to modernise the Visa Information System, the ongoing development of the Entry-Exit and ETIAS (European Travel Information Authorisation) systems and the implementation of the new Visa Code. While applicants may need to turn up in person at consulates in certain instances – for example, first-time applicants and individuals who need to update biometric data – appointments can be booked online.

Some non-EU countries now offer **e-visa** options too, with countries like Georgia, Armenia and Uzbekistan introducing new digital schemes in recent times. While electronic visa provisions are

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1. This term covers platforms or systems that facilitate the connection and pairing of individuals or entities based on specific criteria or preferences, as well as use algorithms and data analysis techniques to identify compatible matches.

initially being offered for tourist services, this is likely to be a first step towards rolling out services which will be used by labour migrants too. Politicians, public authorities and the broader society are currently becoming familiar with e-visa systems, and there is a general shift towards more visa services being offered online. The benefit is shorter waiting times, better security controls and also the heightened image that the country is open to business and labour migration, as well as being forward-looking, progressive and attractive to talent.

A first step down this route across Europe and Central Asia is that countries are capitalising on remote work by offering **digital nomad visas**. Branching out from pure tourism, countries are making it easier for foreigners to gain temporary residency visas while working for a foreign company or as a freelancer.

Such visas take the form of a temporary residency permit which affords visitors the right to stay in a country and work remotely and legally via a computer/laptop to a foreign-based employer or business, thus not contravening any employment or immigration laws in destination countries. Digital nomad visas also help with the creation of networks and facilitate collaboration through an increase in co-working spaces, networking events, and communities of like-minded individuals as migrants are drawn to specific locations. Typically such visas have a duration of 12 months (longer than a tourist visa) and can be extended for one or more years depending on the country issuing the visa. Fees apply and there is a minimum savings and monthly salary requirement in order to be eligible. In the EU, such visas are offered by Cyprus, Estonia, Hungary, Finland, Germany, Greece, Latvia, Malta, Italy, the Czech Republic, Portugal, Romania, Spain and Slovakia. Outside the EU, Albania², Uzbekistan, Kyrgyzstan, Georgia³ and Armenia⁴ have launched such visas or similar schemes, while Montenegro and Serbia plan to make these operational in the near future.

In addition to outlined digital solutions, the use of **Artificial Intelligence (AI)** - simulation of human intelligence processes by machines, especially computer systems - is expanding in all sectors of business and society, and labour migration is no exception. AI is being used to scan high volumes of applications and match individuals to open positions. With AI involved in screening, companies and recruitment professionals can process candidates faster and shortlist who they want. This also has the added benefit of lowering the cost of talent acquisition.

AI language translation and communication tools, real-time translation apps and chatbots can now be used to improve communication between migrants and host communities, overcome language barriers, and facilitate provision of information in a preferred language. AI-based chatbots - digital virtual assistants trained to answer common questions and queries about labour migration - are used in a variety of countries, including Latvia, Ireland and Finland, to inform individuals requiring help about functions and services. These chatbots can respond quickly while communicating with many individuals at the same time, thus increasing efficiencies while reducing the burden on human staff. Georgia has also launched pilot projects and planned initiatives using AI for chatbots, migration forecasting, and tracing documentary fraud.

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2. Albania has approved a law to make it easier for digital nomads to get a residency permit. The process has been streamlined and now only one permit is sufficient instead of the two that were required in the past. The Albania Digital Nomad Visa is for one year and can be extended for an additional year and after that for five years. After seven years, individuals can apply for permanent residency.

3. Georgia does not have a digital nomad visa per se but allows individuals to work remotely whilst staying in the country (provided a salary of USD 2,000 per month and evidence of a bank account containing over USD 24,000 is shown).

4. Armenia has a residency permit that allows foreign business owners to stay one year which can be renewed for up to five years. After this period, individuals can apply for permanent residency. The only requirement is registration as a sole entrepreneur.



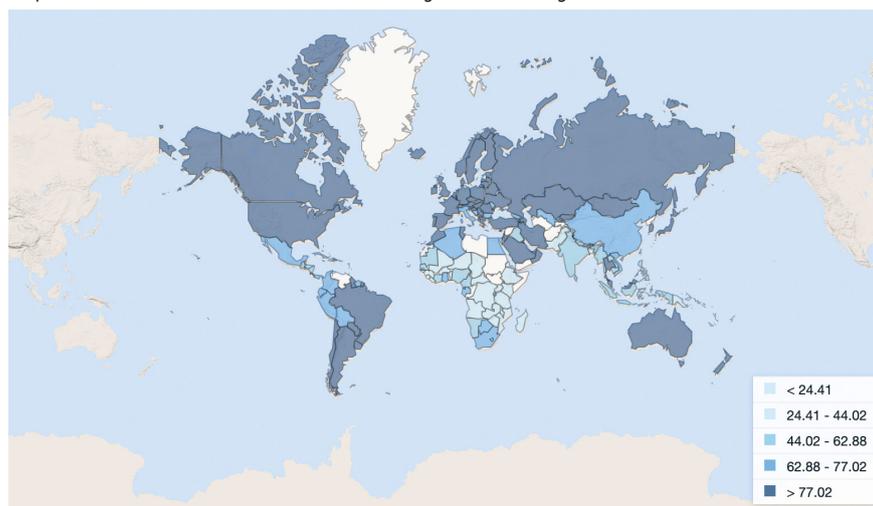
When it comes to AI at the public sector level, this can be used for labour migration as well as asylum services. The Netherlands and Germany use AI to confirm identity based on biometric data and to better detect fraudulent documents. In Finland, the pilot project TIKKA seeks to confirm the identity of applicants through a combination of open-source data, artificial intelligence and human analysis. In Hungary and Lithuania, AI is used for facial recognition to establish identities and prevent fraud. Moreover, host countries can use AI to process large amounts of data needed for the development of labour migration strategies and operational plans.

CHALLENGES TO THE USE OF MODERN TECHNOLOGY IN LABOUR MIGRATION

With the multitude of worth that the digital transition brings to all actors involved in labour migration, the rapid technological advancement equally exposes the gaps and weaknesses that systems, countries and migrants have to overcome to harness its full potential.

Assumingly, the most basic but also significant challenge represent the **growing disparities in access to technology and digital skills** that can hinder labour mobility, signifying the digital divide. For example, internet penetration rates vary across the Prague Process region with the percentage of the population using the internet standing at 99% in Norway, with this figure dropping to 90% in Kazakhstan, 81% in Serbia, 78% in Kyrgyzstan, 77% in Uzbekistan and 75% in Bulgaria. Fixed broadband subscriptions vary significantly too. 44% of the population have this in Germany while the figure drops to 31% in Romania, 22% in Tajikistan, 19% in Uzbekistan, 18% in Ukraine and 14% in Kazakhstan. This means that countries of origin of labour migrants have lower rates of internet penetration and access to broadband services than destination countries.

Map 1. Internet Penetration Rates across the Prague Process Region

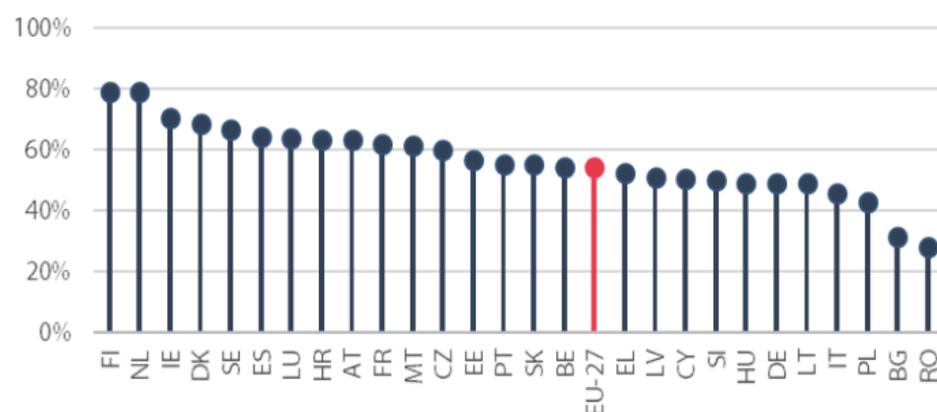


Source: [World Bank](#)

Digital skills that allow individuals to make the most of digital services and use them to facilitate their labour migration vary widely too. The share of people with at least basic overall digital skills (as a percentage of the population aged 16 to 74) stands at 80% in Finland but drops to 30% in Romania. When it comes to the rest of the Prague Process region, countries outside Europe are at the lower end of the networked readiness index produced by UNECE. Sweden scores 78.9 and is ranked third, while Moldova was 67th with 49.5 and Albania was 80th with a score of 46.5.

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Graph 1. Percentage of the population possessing basic digital skills in the EU



Source: Eurostat

These disparities in technologies and skills result in a mismatch, where destination countries provide e-services that migrants cannot access or do not have the skills to utilise, and would-be migrants are often not able to harness the potential benefits of the services that are being offered.

The **recognition of qualifications** - as well as the skills and talents that labour migrants have - is a serious issue since its absence affects their ability to be employed. Companies and organisations do not understand what migrants can deliver while governments and public authorities do not have the processes or means to endorse skills and abilities gained in other countries. Many actors raise the potential of digitalisation to resolve the skills' recognition issue but there is a number of obstacles to tackle before this becomes reality. These obstacles manifest themselves in the form of a lack of standardised and universally recognised credentials for skills, licenses and diplomas. Furthermore, no credential verification methods and systems exist to prove educational qualifications, work experience, and professional certifications across borders. The lack of adequate technology infrastructure - that we mention elsewhere in this policy paper - can also hinder the effective implementation of digital recognition systems for labour migrants' skills. Related to this technology topic is also the potential bias and discrimination embedded in the algorithms and systems used for skill recognition that can perpetuate existing inequalities and limit the recognition of skills among labour migrants.

In addition to these issues, there are more subtle obstacles too. Language and cultural barriers exist whereby certain nuances and context can be misunderstood. This makes it even more difficult to accurately assess the skills that migrants possess, even with translation tools and platforms. Another potential barrier is that digital systems can also fail to adequately capture cultural biases and variations in work practices.

All these elements can therefore create multiple barriers to migrants entering the labour market, forcing them to take jobs that they are over-qualified for. Digitalisation can help in addressing these issues by highlighting the abilities that individuals have in an easy to access, understandable and secure way. In doing so, individuals, companies and government authorities will gain trust as well as speed up processes.

The need to have ways for assessing, validating and recognising formal, non-formal and informal skills is vital from a migrant's perspective. Destination countries need skills and competencies, but they must also consider consumer protection and guarantee that an individual is sufficiently

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skilled to carry out the relevant task. These provisions need to be consistent from country to country while technology should be utilised to underpin this. Creating networks and establishing similar criteria, processes and procedures across the Prague Process region is important, as is giving consistent guidance on the recognition process and requirements. While not being a panacea, digitalisation will make all these elements easier, quicker, cheaper and also more secure. In short, the current issues in the region surround a lack of harmonisation; language barriers (proficiency exams in the local language are common across the region); the need for licenses and certifications (some countries in the region require these and often additional requirements are demanded); limited cooperation and coordination among relevant stakeholders, such as government bodies, regulatory authorities, and professional associations. Technology and digital solutions can be employed to address these barriers and improve efficiencies. Yet they cannot solve all issues: governments and public bodies need to establish consistent policies, procedures and an overall framework of rules that can facilitate the development and adoption of digital platforms for skill recognition.

Beyond the access to the needed technologies, availability of skills and recognised qualifications, one shall not forget that **not all jobs can be carried out remotely**. Construction workers, cleaners, firefighters and surgeons - to name but a few - need to be physically present to carry out their work. There are also **questions regarding taxation** being raised around e-matching services, and where it is paid, as well as the **availability of social security** to workers who find employment via platforms. Rapid advancement of technology and automation resulting from digitalisation can lead to job displacement and skills gaps, requiring labour migrants to constantly adapt and acquire new digital skills to remain relevant in the changing job market.

Another challenge comes in the shape of the **application process for digital nomad visas which can often be complex**. Some digital nomad visa programmes have specific requirements and require significant documentation. Gathering this, and meeting eligibility criteria, can be time-consuming and require extensive preparation. Furthermore, while digital nomad visas allow individuals to work remotely, they often come with limitations on engaging in the local employment market or starting a business within the destination country. This can restrict the range of work opportunities available to digital nomads and limit their professional growth or income potential. Digital nomads are also still subject to tax and employment rules which can be difficult to understand and tough to navigate without professional help. Moreover, digital nomads may face challenges in accessing essential services and benefits, such as healthcare, social security, and insurance coverage. The availability and quality of such services vary between countries, and navigating what is available can be complex, for which reason a far greater number of people still favour tourist visas to any digital nomad ones.

EXISTING POLICY MEASURES AND RECOMMENDATIONS FOR ENABLING LABOUR MIGRATION TO LEVERAGE DIGITALISATION

When it comes to recommendations, the overall emphasis should be on acknowledging the digital revolution underway and trying to harness the potential for labour migration, rather than stifle it. This should take the form of driving initiatives in the fields of education and developing digital infrastructure, supporting digital matching services, and for public authorities to provide e-services. In addition, technology needs to be deployed to easily and efficiently recognise the skills, talents and qualifications that individuals possess as well as issue and process visas while balancing the need for control with facilitation.

Education and infrastructure development are vital along with the recognition of skills and roll out of new services.

Supporting education and infrastructure development

The open and widespread access to high-speed internet - at an affordable price - is vital to the uptake of digital services, particularly if they are being offered and intended to be used in origin countries. The provision of these services also needs to be linked with education on digital issues and skills training for migrants and would-be migrants. This translates into the need for dedicated digital skills training to be integrated into education programmes for all members of society. This can be offered through national agencies or through public-private partnerships whereby digital companies and platforms can help in defining and implementing the training that is required, both in terms of basic and advanced digital skills training.

In Europe, there is the Digital Education Action Plan (2021-2027) which sets out a common vision of high-quality, inclusive and accessible digital education and aims to support the adaptation of the education and training systems of Member States to the digital age. The twin pillars of this initiative are 1) Fostering the development of a high-performing digital education ecosystem, and 2) Enhancing digital skills and competencies for digital transformation.

Under these policy headings, several concrete actions have been initiated which will indirectly help labour migrants covering a European Digital Education Content Framework, Digital transformation plans for education and training institutions, Common guidelines for teachers and educators to foster digital literacy, and Digital Opportunity Traineeships. These actions will help migrants acquire the necessary digital competencies and adapt to the digital workplace, increasing their employability and integration opportunities. Access to online learning opportunities (remote learning, online courses, and e-learning platforms) will allow migrants to upskill themselves conveniently, irrespective of their geographical location. The Digital Education Action Plan also emphasizes the recognition and validation of digital skills acquired through non-formal and informal learning, which will help migrants, as will the development of digital tools and platforms for language learning provisions.

e-Matching services

Despite huge strides being made through the availability of digital recruitment and e-matching services, many governments, public authorities, employer organisations and trade unions are sceptical towards these new services, particularly those aimed at providing ride-hailing and food-delivery services. With this in mind, the EU Platform Economy Worker Rights Directive was proposed in December 2021 to improve the working conditions in platform work. The text is currently with the representatives of national governments who are aiming to reach a position before the end of June 2023. Once enacted the aim is for platform workers to have access to a minimum wage, paid holidays, unemployment, sickness and health care benefits to name but a few.

As a result of the proposed Platform Worker Rights Directive, it is estimated that between 1.7 million and 4.1 million people could be re-classified as workers. However, many of them are legitimately self-employed and do not wish to be full-time employees, since they value flexibility and choice over when, where and how they work. When similar legislation, with a clear presumption of employment, was introduced in Spain in 2021, the number of jobs available fell, along with the wages of platform workers.

Furthermore, new rules on administrative cooperation in the field of taxation came into force in the EU in January 2023, which cover platforms and digital work for the first time. This is a new European reporting obligation which mirrors OECD requirements and aims to identify where tax is paid and ensure monies enter national coffers, closing loopholes and clarifying rules.

With the policy being currently focused on control rather than facilitation, it limits opportunities for labour migrants while threatening the potential of the digitalisation of matching services. This

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is something which needs to be addressed. By focusing on traditional, nine-to-five definitions of employment, the ability to harness the potential of digital labour and matching platforms is being missed while also limiting labour migrants in finding work. Opening space for discussion with platform workers or the platforms themselves should be the first step to adopting forward-looking regulations in this area. Moreover, decision-makers should be pragmatic and harness digital platforms to create jobs and opportunities for migrants while providing them with a channel to earn money as well as enter the labour market in their destination country.

Provision of online services

IMF research highlights that there is a correlation between the accessibility of government information and services online and the volume of foreign direct investment a country receives. This is due to the fact that when a government provides accessible and transparent information online, it enhances investor confidence in the country's business environment. This is also linked to increased efficiency and ease of doing business, since online accessibility to government information and services streamlines administrative processes and reduces bureaucratic barriers. Accessibility of information also provides the basis for market analysis, shows a commitment to the Rule of Law and also an openness to collaboration and partnerships. This is in addition to helping with the attraction of talent and labour migrants. As such, countries that offer services electronically and focus on digitalisation can reap the benefits. The availability of digital services is therefore as important as electricity, roads and clean water in modern society.

Furthermore, online services are particularly effective in the pre-departure phase to help individuals take an informed decision about migration. Services can also help migrants learn the language and acquire skills that can speed up their integration after arrival, and connect them with the communities in destination countries. Support for Migrant Resource Centres (MRCs) is vital in this regard and more of their services should be delivered by digital channels, allowing them to scale their activities and their impact accordingly.

Recognition of qualifications, skills and talents

The European Commission is developing the European Digital Credentials Infrastructure (EDCI) to support efficiency and security in how credentials such as qualifications, skills developed and other learning achievements can be recognised across Europe. This will support authentication services for any digital documents or official information on skills and qualifications. To this end, the European Decision on a common framework for the provision of better services for skills and qualifications (Europass) was adopted in 2018.

These digital credential files can include a wide range of information that can help with recognition and understanding by employers and other institutions, as well as reduce the impact of credential fraud. The European Commission is developing the tools, software and services that will form part of the EDCI. 18 countries are participating in piloting digital credentials to test these elements at the national level.

A good national example that could be replicated is the Swedish Qualifications Assessment Tool. This digital portal shows the user what their foreign qualification is comparable to in Sweden and helps in finding employment as well as planning studies. Currently, assessments can be made of 1,000 qualifications from 77 countries.

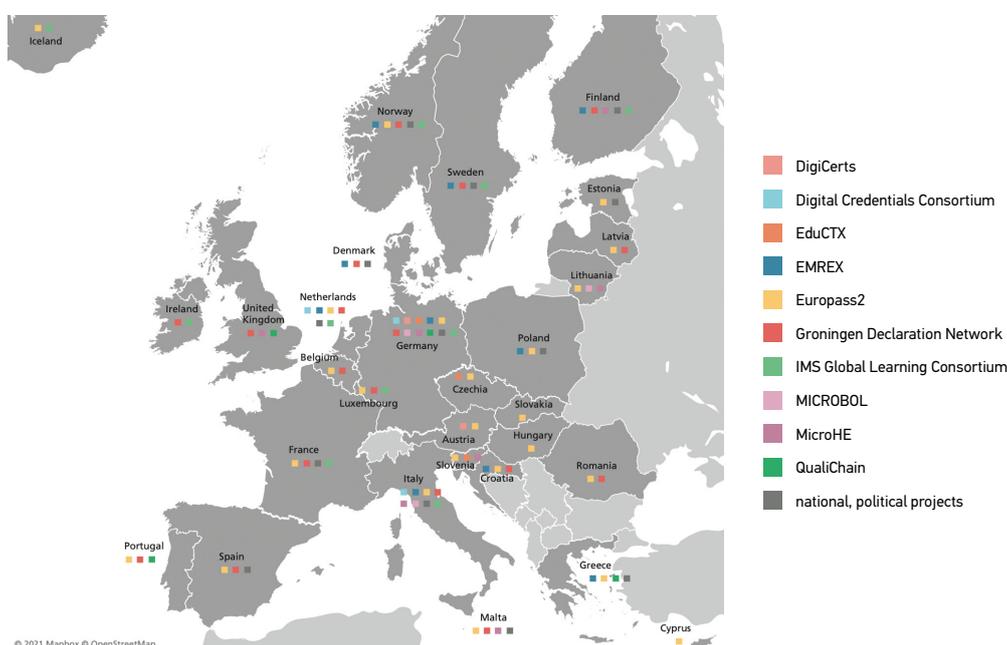
Yet, once again, this is an area where national rules are limiting recognition. By way of an example, the Federal Ministry for Labour and Economy (BMAW) in Austria needs to declare vocational training credentials obtained abroad to be equivalent to the related final apprenticeship examination taken under the Austrian system. Furthermore, practical examinations are required in some cases to achieve full equivalence with the final apprenticeship examination.

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However, further positive developments have already been witnessed. A Europass Qualifications Dataset Register (QDR) has already been developed in addition to an Accreditation Database against which European Digital Credentials are verified. So far, more than 50,000 external quality assurance accreditations and evaluations have been given to over 3,000 higher education institutions.

EMREX - an electronic data exchange for students - has also been created to empower individuals to control their data and exchange it across borders for various purposes. Today this includes 1,674 connected institutions.

Map 2. International cooperation and networking of European countries on the topic of digital credentials in education



Source: Robert Rentsch 'Digital Credentials in Education – The Situation in Germany and Europe in 2020

In June 2022, the EU also adopted a Recommendation on a European approach to micro-credentials for lifelong learning and employability. Micro-credentials - validated specific skills or knowledge gained in a focused area - certify the knowledge outcomes of short-term learning experiences and training courses. The Recommendation seeks to support the development, implementation and recognition of micro-credentials across institutions, businesses, sectors and borders.

Work on recognising qualifications and skills should be continued, and more institutions internationally should be covered since the current focus is still fairly Eurocentric. The use of qualified electronic seals is very positive and ensures the integrity of the qualifications covered. There are also digital credentials which are blockchain-verifiable - data or information that can be independently verified and validated while being protected against tampering - which is a constructive step forward and demonstrated in a prototype in collaboration with the European Blockchain Services Infrastructure (EBSI) project.

This use of digitalisation will increase trust in the system of recognising qualifications, as well as preventing fraud and increasing interoperability. Individuals should be able to store the certification of their skills, knowledge and qualifications in a secure digital wallet that they can share with public authorities and corporate entities alike.

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The recognition of micro-credentials is also crucial since more specific knowledge is focused on short-term courses and training schemes, much of it web-based, and often very specific in its focus. Shorter forms of learning opportunities are growing in popularity at the expense of traditional qualifications and these skills must be recognised quickly and simply by digital means. Furthermore, digital tools need to be created which allow for the recognition of the skills, qualifications and expertise of third-country nationals (TCNs) and these need to be recognised across the EU and Central Asia.

Online visa application services

The provision of online visa application services makes it easier for talent to fulfil the administrative side of labour migration while also allowing authorities to exert more control, use resources more efficiently and combat fraud. In April 2022, the European Commission adopted a proposal for a Regulation on the digitalisation of the EU visa procedure. This is based on the need for more security while making use of the significant technological developments which provide new opportunities to make the Schengen visa application process easier, quicker and smoother for both individuals and consulates. Visa applications can be signed electronically by law, yet many EU Member States still used paper-based procedures.

At present, the proposal is being debated by the European Parliament and Council. The development of the online Schengen visa system is expected to begin in 2024, while the platform is intended to be fully operational by 2026. Individual Schengen Member States will then have five years to transition from current visa application methods to the new unified systems. This means that all Schengen visa applications could be processed digitally by 2031.

Familiarity with the digital health passports that were rolled out during the pandemic has led to the EU's fondness for a general "digital identity" concept. The growing feeling is that digital instead of paper documents can make work and visa document submission and checking processes easier, faster and less exposed to fraud. This has also led to the rise in companies like Verified, TruID and Veriff offering e-authentication products and services.

Yet, while a great deal is happening with regard to the digitalisation of visa application and processing procedures, national differences undermine the region-wide endeavour. More specifically, Prague Process countries should look to standard practices related to e-visa applications and also e-visa processing times and standards for communicating immigration decisions. This would ensure a unified process and also limit visa shopping on the grounds of easier procedures. The Regulation on the digitalisation of the EU visa should be passed to simplify procedures and speed up processing times as well as the overall administrative burden. These digital provisions should be extended across the region to visas for people with special talents as well as "digital nomads": the national visas issued to qualifying TCNs and foreign entrepreneurs who are capable of performing their remote work services.

Balancing control with facilitation and striving for interoperability

It is also important that digitalisation balances facilitation with extra controls in Europe and Central Asia. Digital tools should facilitate matching jobs to workers and spreading reliable information as opposed to purely meeting security-related goals, such as fighting against fraud, crime, terrorism, or the secondary movement of migrants. Moreover, increased digitalisation should go hand in hand with increased online authentication and e-security programmes. The EU Digital Identity Wallet initiative is positive, but it should be implemented in such a way that data is not being used and shared illegally or abused to exert excessive control over citizens and the broader population.

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Best practices should be shared across borders so that successful activities can be replicated across the Prague Process region. Related to this, more data needs to be shared across borders safely and securely. To this end, new and existing digital systems need to be interoperable in Europe and Central Asia, and ideally also at the international level.

FURTHER READING

ICMPD Migration Outlook - Eastern Europe and Central Asia 2023

<https://www.pragueprocess.eu/en/resources/repository/33-reports/373-icmpd-migration-outlook-eastern-europe-and-central-asia-2023>

Migrant Resource Centres (2023)

www.migrantresources.org

Using emotions in migration policy communication - Policy Brief (2022)

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The role of information campaigns in addressing irregular migration - Policy Brief (2022)

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European Commission (2004) common framework for the provision of better services for skills and qualifications (Europass) <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32018D0646&from=EN>

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