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Fostering Inclusion of Workers in Vulnerable Situations: Practices and Policies at Company-Level. Evidence from qualitative interviews in four countries: Norway, Germany, Romania, Poland

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PATHS2INCLUDE



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**European Labour Markets Under Pressure –
New knowledge on pathways to include persons
in vulnerable situations**

Title: Fostering Inclusion of Workers in Vulnerable Situations: Practices and Policies at Company-Level. Evidence from qualitative interviews in four countries: Norway, Germany, Romania, Poland

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Introduction

This working paper is part of PATHS2INCLUDE, a research project funded by the European Union's Horizon Europe (101094626). The overall objective of PATHS2INCLUDE is to disentangle the dimensions of discrimination and unequal opportunities in the labour market to gain knowledge on how to develop inclusive labour markets for persons in vulnerable situations. A key goal is to understand how contextual factors disproportionately expose certain groups to risk and vulnerability throughout their life course and during critical transitions. This working paper is part of work package 5, with the overarching goal to study employment policies, and institutional and individual factors affecting employment among older workers.

This working paper investigates how company-level strategies interact with national policy contexts to support the inclusion of vulnerable workers across the three different phases of employment – recruitment, career development, and retention. Using qualitative interviews with employers in Germany, Norway, Poland, and Romania, we explore how organisations respond to vulnerabilities related to health limitations and disability, age, and caregiving responsibilities. The qualitative data reveal both barriers and facilitators to inclusion at company level. The analysis is guided by the premise that inclusive employment practices are shaped not only by national welfare infrastructures, but also by how policies are interpreted and enacted at the workplace level through relational processes and strategic choices. The selected countries represent contrasting institutional legacies and welfare regimes, offering insight into how inclusion policies are implemented in diverse contexts. By looking at employer perspectives across the four countries, we manage to highlight key similarities and differences in how inclusive employment practices are approached.

The working paper is structured as follows. The first section gives a brief overview of vulnerabilities across the three phases of employment, recruitment, career development, and retention. This is followed by a description of the data sources and methodological approach, which is based on qualitative interviews with employers in four European countries: Germany, Norway, Poland, and Romania. The second section consists of four country-specific parts. Each part provides a short summary of relevant policy context and findings from the qualitative interviews, which are organised according to the three phases of employment. The final section concludes by summarising the key findings, drawing out insights across the four countries, and discussing their implications on how policies and workplace-level strategies interact to shape inclusive employment for vulnerable groups.

Vulnerabilities across the career cycle

Inclusion at the organizational level refers to a process that enables all employees, regardless of their backgrounds or personal circumstances, to fully participate and feel valued in the workplace. It extends beyond numerical diversity or compliance with equality legislation, and involves belonging, fairness, and respect in day-to-day work relations (Shore et al., 2011; Dobusch, 2021). Inclusive workplaces require structures, practices, and everyday interactions that allow all workers to be part of and have a meaningful contribution to their organisation. Inclusiveness relies thus on the alignment of formal systems (e.g., recruitment) with informal dynamics of trust and social relations, being both a structural and relational process.

Studies across Europe highlighted that inclusive outcomes depend on both institutional enablers such as welfare and employment policies (Eurofound, 2025; OECD, 2022) and organizational drivers, like

HR capacity, workplace adaptations, and supportive managerial practices (Leoni, 2024; EU-OSHA, 2017). Inclusive workplaces emerge where policy measures (e.g., equality legislation) are translated at the organisational level into concrete practices (e.g. accessible recruitment, job redesign, counselling, leadership/worker participation), whereas gaps in these layers can weaken outcomes. While larger economic policies can deter the impact of policy measures on inclusive workplaces (economic and social goals could inadvertently compete resulting in poor integration of workers with vulnerabilities), contextual elements like the macro- and meso- levels are key in impacting participation in the labour force of groups in vulnerable situations.

However, so far, research on inclusion of groups in vulnerable situations at company level was mostly preoccupied with capturing the perspective of employees (and their perceptions), while insights into organizational practices from the viewpoints of employers were less surveyed (Kersten et al., 2023). Furthermore, most of the studies concentrated on recruitment and selection, while the further career phases were rarely considered despite the fact vulnerabilities intersect with key moments in the employment lifecycle, shaping employees' experiences and outcomes in specific ways (Mullin, 2021). Yet, these dynamics are often overlooked in generic diversity and inclusion research, which tends to focus on static snapshots rather than integrative, phase-sensitive approaches.

During recruitment, organizational policies and practices determine whether candidates with vulnerabilities have equitable access to opportunities. This phase reveals structural barriers such as biased job descriptions, inaccessible hiring processes, or inflexible criteria that disproportionately exclude those with care responsibilities or disabilities. Employer perspectives can expose underlying attitudes and perceived costs associated with hiring vulnerable candidates, as well as the presence or absence of reasonable accommodations. In the establishment phase, the lived reality of workplace integration becomes visible. Policies on flexible work arrangements, health support, and career advancement can either mitigate or exacerbate vulnerabilities. Employer insights can provide rich information into how such policies translate into practice or remain symbolic, revealing differences in organizational willingness or capacity to foster inclusion. Finally, exit, dismissal, or continuation decisions reflect how organizations value and sustain employees with vulnerabilities over time. Studies show that vulnerable groups may face higher risks of premature exit (Schuring, 2020; OECD, 2022; Valls Casas et al., 2025) due to inadequate support or bias. Employer interviews can reveal whether exit procedures are conducted with sensitivity to vulnerabilities or reinforce exclusionary practices, and how continuation pathways (e.g., phased retirement, retraining) are institutionalized.

Several types of practices have been identified in a scoping review of literature that employers considered valuable in the inclusion of vulnerable workers: senior management commitment, recruitment and selection, performance management and development practices, job accommodations and redesign of work, supportive culture, external collaborations with other employers, and monitoring (Kersten et al., 2023). However, results on the topic remain rather general and they lack description of the employers lived experience of inclusion in the workplace.

Vulnerable categories face disproportionate challenges in obtaining and maintaining jobs in the labour market: disabled persons, those with a migration background, long-term unemployed, low-educated persons, people with health limitations, those approaching retirement age, and people with care responsibilities. Our focus here is on disability, health limitations, age and care responsibilities.

Research evidence shows that persons with disabilities have lower opportunities to be included in the labour market according to employer's perspective, because of their need for adaptations in work in terms of content, place or time (Kersten et al., 2023) as well as other factors like prejudice, unequal opportunities, workers' low educational attainment, and lack of training opportunities (Toldrá & Santos, 2013). Previously, studies showed persons with disabilities are discriminated against in hiring,

employers limiting their access to employment opportunities even in contexts characterized by favourable circumstances as is the case of Norway, thus perpetuating inequalities in labour market outcomes (Bjørnshagen & Ugreninov, 2021). Similarly, health limitations often result in reduced employability due to recurrent absences, stigma regarding productivity, and insufficient workplace adjustments. Research highlights that chronic illness and poor health conditions can generate employment insecurity, while programs designed to support employees returning to work after sick leave vary largely across Europe by country, welfare regime and size of company (Leoni, 2024). Regarding age, older workers often encounter structural and attitudinal barriers linked to technological change, productivity expectations, and retirement norms. Studies across Europe consistently show that age stereotypes, especially that older workers are less adaptable, less innovative, and harder to train, continue to shape hiring and promotion decisions (Carlsson & Eriksson, 2019). At the same time, employers report uncertainty about how to balance intergenerational equity and knowledge transfer, particularly in sectors undergoing digital transformation, where older workers risk being left behind (Eurofound, 2021). Such tensions produce inconsistent inclusion strategies: while some organizations implement mentoring or flexible retirement options, others opt for early exit schemes that reinforce age-based segmentation (Keskinen, Sandt, and Nikander 2024).

Care responsibilities constitute another underexplored dimension of workplace inclusion. Despite legal advances promoting work–life balance, caring remains a gendered issue: women disproportionately adjust their employment to meet family needs, often through part-time or flexible arrangements that limit career progression (Lewis et al., 2019). The availability and cultural acceptance of flexible work differ widely across Europe, ranging from institutionalized entitlements in Nordic countries to individualized, ad hoc negotiations in Central and Eastern Europe (Chung & Van der Lippe, 2020).

Together, these strands of evidence underline that inclusion for people facing health limitations, disability, age-related constraints, or care responsibilities is shaped not only by individual circumstances but also by organizational perceptions and institutional contexts.

By examining Norway, Germany, Romania, and Poland, the study captures how diverse institutional contexts shape inclusive employment practices. These four countries represent contrasting welfare-state regimes and patterns of socio-economic development, providing analytical diversity. Norway exemplifies the Nordic universalist model, characterized by high de-commodification and state-supported inclusion through trust and welfare integration. Germany typifies the conservative–corporatist model, where inclusion is mediated through legal compliance, social insurance, and negotiated employer obligations. Romania and Poland, as post-socialist transition economies, illustrate hybrid models of EU-driven equality frameworks with still-evolving administrative capacities and organizational cultures. These contexts highlight how inclusion policies are interpreted and enacted under differing institutional legacies, revealing the balance between formal regulation and effective practice. This design offers insight into the extent to which inclusion depends on welfare infrastructure versus workplace-level agency.

Our research questions are: 1. What are the specific barriers and facilitators at organisational level affecting the retention of workers facing vulnerabilities—namely health-related limitations, disability, older age, and caregiving responsibilities—across each career cycle phase: recruitment, establishment (including onboarding), and exit or continuation in the workforce? 2. What insights can be drawn from a cross-contextual inquiry into workplace vulnerability experiences and retention policies in Germany, Poland, Norway, and Romania?

2. Methods and data

This study employs a qualitative thematic analysis to explore how companies in Norway, Germany, Romania, and Poland address vulnerability in recruitment, onboarding, and exit processes. The research draws on qualitative data collected within the PATHS2INCLUDE project and is based on in-depth, semi-structured interviews with employers. Participants were selected through purposive sampling to ensure diversity in company size, industry sector, ownership type (public/private), and country context. The selection was focused on including HR professionals, managers, and recruiters (either external to an organization or internal). In each country, 15 interviews were conducted (total N = 60) between June 2024 and March 2025.

All countries followed a similar interview guide, developed jointly, and adjusted locally. The guide covered recruitment processes, strategies to avoid mis-hiring, institutional requirements, onboarding, diversity policies, career development, and staff reductions. Researchers also collected data on company characteristics and interviewee profiles. Ethical standards were uniformly applied: all participants received detailed study information, provided consent, and data handling complied with country-specific GDPR regulations. The Norwegian Service for Sensitive Data (TSD) platform ensured secure data storage and analysis. All interviews were audio-recorded with informed consent, transcribed verbatim in the original language, and subsequently translated into English for cross-country comparison. To preserve confidentiality, all transcripts were anonymized and identifying details removed. Ethical approval was obtained from the coordinating institution's research ethics committee, and all participants provided written informed consent.

More details about each sample can be found in Annex.

2.1. Norway

In Norway, 15 semi-structured interviews were conducted primarily with line managers and two recruiters from headhunting companies. All participants were recruited by monitoring job advertisements on *Finn.no*, the country's largest online marketplace, and directly contacting employers whose job profiles matched the study criteria (e.g., ICT technician, office clerk). The sample reflected a range of company sizes and sectors. Most of the companies (12) were large sized (over 250 employees). Industry representation covered ICT, the headhunting industry, public administration, accounting, transportation, construction, energy, insurance, and communication. In terms of ownership, eight companies were from the private sector, six from the public sector and one had mixed ownership (public-private). The recruitment approach ensured inclusion of both male (5) and female participants (10).

2.2. Germany

Germany's sample consisted of 15 interviews with primarily business owners and HR managers. Recruitment relied heavily on the "Unternehmen integrieren Flüchtlinge" network, which supports refugee integration and lists over 4,600 member companies. Eleven participants were randomly selected from this network, three from existing contacts, and one through referral. The companies varied widely in size—from 12 to 139,000 employees—and sectors such as logistics, IT, crafts, insurance, retail, tax consulting, manufacturing, and public administration. Fourteen participants worked in the private sector and one in the public sector. Interviews were conducted both online and

face-to-face. The German participants mainly held senior roles such as company owners and HR directors.

2.3. Romania

The Romanian sample consisted of 15 in-depth interviews with employers, primarily human resource professionals and managers. Participants were initially identified using the public business registry *listafirme.ro* and further selected through purposive and snowball sampling, drawing on professional recommendations and referrals to ensure sectoral and organizational diversity. Company size distribution was as follows: eight large enterprises (over 250 employees), one medium-sized company (50–249 employees), and six small enterprises (10–49 employees). Industry representation was broad, covering ICT, food and beverage, finance, metal manufacturing, training and language services, gaming, car services, events, and education. In terms of ownership, 14 companies were from the private sector and one from the public sector. Female participants predominated in the sample (10 out of 15 interviews). Interviews were conducted both in person and online, depending on participants' availability and location.

2.4. Poland

In Poland, 15 interviews featured a range of participants including company owners, directors, HR specialists, and two external head-hunters. The sample covered private companies (10 participants), public institutions (three), and NGOs (two). Recruitment was carried out mostly through personal contacts and referrals. Company size, sector, and locality varied to reflect a comprehensive overview of employer practices. Company size distribution was as follows: eight large enterprises (over 250 employees), two medium-sized company (50–249 employees), and five small enterprises (10–49 employees). In terms of ownership, eleven companies were from the private sector and four from the public sector. The Polish sample was evenly distributed among females and males (7 and, respectively, 8).

2.5. Analytical strategy

Data analysis combined deductive and inductive coding. A deductive framework derived from the literature on workplace inclusion guided initial theme development, while inductive codes captured country-specific and emergent insights. Coding was conducted within one national research team by one researcher and collaboratively reviewed within the team to ensure consistency and inter-coder reliability. The comparative design reflects a multiple-case logic, treating each country as a contextually bounded case while identifying overarching themes (Yin, 2014).

The analysis examines how employers address vulnerability across the three key career phases, recruitment, establishment, and exit, by focusing on the four types of vulnerabilities: health, disability, ageing (including the integration of older workers and intergenerational relations), and care responsibilities. Employers' narratives are analysed to identify both the barriers and facilitators at organizational level in the inclusion of vulnerable workers. The thematic analysis brings to light recurring challenges, adaptive practices, and contextual differences in how companies across the four countries translate inclusion principles into everyday workplace reality.

3. The German case

3.1. Policy context

Germany is classified as a conservative type of welfare state according to Esping-Andersen (1990) and is characterised by a strong focus on employment and social insurance benefits. Thus, social claims are closely tied to social status and individual employment history, and they largely derive from the contributions paid (Manow, 2004). Against this backdrop, the German labour system is often described as a dualistic employment regime, where core sectors of the labour market enjoy high protection, while peripheral areas are more flexible and less regulated. This has somewhat changed, but there are still issues, mostly due to the widespread usage of temporary contracts (Eichhorst & Marx, 2021).

Germany has a comprehensive system for protecting workers' rights, comprising specific legislation to ensure fair working conditions and the participation of most types of employment. The General Equal Treatment Act (AGG) protects against discrimination on the grounds of gender, age, ethnic origin, religion or belief, disability, or sexual identity. The Part-Time and Fixed-Term Employment Act (TzBfG) is a key legal framework for employment, establishing the conditions for part-time work and fixed-term contracts that can last up to two years without a material reason. The Protection Against Dismissal Act (KSchG) offers protection against unjustified dismissals by considering factors such as seniority and social selection. The Social Code Book IX (SGB IX) provides significant protection for individuals with disabilities, promoting equal participation in the workforce. Employers with at least 20 employees must fill at least five per cent of their positions with persons with severe disabilities, otherwise they must pay a compensatory levy. Furthermore, employers must ensure barrier-free workplaces within the realm of what is feasible and reasonable. Individuals with severe disabilities are granted additional protection against dismissal, extra holiday days and participatory rights through the representative body for employees with severe disabilities. The Equal Opportunities for Persons with Disabilities Act (BGG) ensures equality in the public sector and provides access to public services without barriers.

Extensive family and care-related rights exist to help balance work and family commitments. The Maternity Protection Act (MuSchG) protects pregnant and breastfeeding women by prohibiting their employment, providing protection periods of six weeks before and eight weeks after birth, and protecting them against dismissal. According to the Parental Leave and Allowance Act (BEEG), parents can take up to three years' parental leave per child, with job protection. Parental allowance typically ranges from 65% to 67% of previous net income. For very low incomes below €1,000, the percentage can be gradually increased to provide better financial security. For incomes above €1,200, the percentage is correspondingly reduced. Parental allowance is also subject to legal maximum limits. The Family Care Leave Act (PflegeZG) allows for a leave of absence of up to six months, either full-time or part-time, to care for close relatives, while the Family Care Time Act (FPfZG) permits part-time care of up to 24 months. In both cases, special protection against dismissal is provided. Health-related risks are also legally covered. According to the Continued Payment of Wages Act (EFZG), employees receive their full salary for up to six weeks if they are ill. After this period, statutory health insurance pays sick pay amounting to 70% of gross earnings, up to a legally established maximum limit of 90% of the last net earnings. Payments, including continued wage payments, are limited to 78 weeks within a three-year period (SGB V). Additionally, the Occupational Health and Safety Act (ArbSchG) requires employers to carry out risk assessments and implement preventive health measures. Following prolonged illness, operational reintegration management must also be implemented to facilitate the return to work (SGB IX).

The German pension system is based on three pillars and provides financial security in old age. The first pillar is statutory pension insurance (SGB VI), which operates on a pay-as-you-go basis. Benefits are determined by contributions paid and years of employment. This is supplemented by voluntary occupational and private pensions. The basic pension (Grundrente), introduced in 2021, has been providing a top-up for low-income retirees with at least 33 qualifying years. It is automatically assessed by the pension authority, which helps reduce old-age poverty. Additionally, the Partial Retirement Act (AltTZG) regulates the flexible transition into retirement. In cases of permanent disability, corresponding pension entitlements under SGB VI aim to provide a livelihood.

3.2. Findings

Recruitment

At the recruitment stage, although there are not specific internal policies mentioned, it seems that the presence of the HR department is the main facilitator in relation to the vulnerabilities related to care responsibilities. In the case reported by a recruiter at an international logistics company, the HR department is strongly involved to support equal treatments of applicants with care responsibilities. The interviewee noted that in some cases department managers can be reticent to hire mothers with children, preferring instead applicants without children. So, barriers and facilitators in these cases are at the level of personal background of the heads of departments and the organizational culture embodied in the HR department: "And again, the department head, let's say he's male, who may not be inclined to favour the mother with two children, but perhaps someone else, we have a say in that and (...) can participate in the decision-making process." (DE_Int01).

In Germany, some employer narratives reveal a complex balance between openness and structural challenges when addressing health limitations in the workforce. One interviewee noted that during recruitment, there is a noteworthy willingness to consider career changers who are unable to continue their original profession due to health issues. One retailer illustrated this: "Sometimes we also receive unsolicited applications from career changers who, for whatever reason, can no longer work in their profession (...) due to health reasons... which is very good for us." (DE_Int06). People who used to work in craft occupations but are unable to continue doing so because of health issues are taken into consideration in this scenario. According to the interviewee, who owns a hardware store, hiring previous craftsmen is inherently beneficial because they bring a wealth of expertise and can offer good customer advice, both of which are thought to be very enriching for their firm. In this instance, prior expertise is valuable and surpasses health constraints. This employer's inclusive approach, however, is not codified in any precise rules, indicating a dependence on individual managerial responses, situational assessment, and broad legal frameworks rather than specific procedural practices that are routinely implemented.

According to some interviewed companies, there is a noted tension between demographic realities and productivity concerns in recruitment. The company owner of a craft company expressed concern over an aging workforce approaching the late forties on average: "(...) The average age is approaching 47 or 48. Soon, we will be able to call it a retirement home. That will have a really negative impact on productivity." (DE_Int02). He supported his statement stressing how physically taxing construction site labour is. Additionally, he stated that while working until old age (until retirement) is not an issue in an office setting, it is a different matter on a construction site because of weather and other variables.

To address this, some of the interviewed companies emphasized that they focus on recruiting younger workers to lower the average workforce age. However, there is no explicit national or organizational

policy compelling age-diverse recruitment. Decisions depend mostly on leadership mindset and openness to innovation. Another interviewee from an international logistics company noted: "(...) the age and mindset of the decision-maker affects whether innovative recruitment strategies, like recruiting refugees or third-country nationals, are adopted." (DE_Int08). This underscores how personal attitudes create barriers or facilitators beyond formal policy frameworks.

Facilitators and barriers can sometimes coexist in the same regulations, as they reflect not only specific solutions to approach integration of workers with a specific vulnerability, but also particular constraints that recruiters and organisations encounter if they must access a pool of potential employees. In Germany, the legal framework under the Social Security Code (SGB IX) provides strong protections and structures. Employers must comply with a 5% disability quota (for companies with an average of at least 20 employees) and discrimination during recruitment is prohibited. A compensation charge must be paid if the quota is not reached. This implies that rather than genuinely trying to hire people with severe disabilities, one can just decide to pay this levy. However, the implication of a compensatory levy system at the organisational level for the integration of persons with disabilities is manifold. While the levy is intended as a motivator for employers to meet employment quotas for persons with severe disabilities, it can inadvertently create a disincentive for genuine integration efforts. Organisations might opt to pay the levy as an easier alternative to hiring and effectively integrating persons with disabilities. This can lead to minimal substantive inclusion and reduce the motivation for creating accessible workplaces or investing in accommodations necessary for successful employment of persons with disabilities. However, payment of the compensatory levy does not exempt employers from their legal obligation to employ persons with disabilities. The levy also functions as a compensatory tool, redistributing funds to support employment of persons with disabilities, such as through workplace adaptations and support measures.

Facilitation is enhanced by the role of representatives for the persons with severe disabilities actively engaged in recruitment processes: "If someone states that they have a severe disability, we contact the relevant representative" (DE_Int01). However, quota fulfilment is ambivalent. Forced invitations to persons with disabilities can feel tokenistic, as noted by a public administration interviewee: "Sometimes you have to pretend to them because they have to be invited, so you invite them even though... it won't work" (DE_Int11). An interviewee mentioned that organizational commitment through awareness training, led by global inclusion officers, is a key practice improving inclusivity beyond legal compliance (DE_Int08).

While structural accessibility in physical workplaces remains a barrier, companies recognise the need for improvements. Some branches have adapted workplaces for specific disabilities, such as accommodations for deaf employees: "We recently hired a colleague ... who is deaf ... we have adapted his workplace" (DE_Int08). However, a lack of overall comprehensive accessibility and formal guidelines persists. Legal mandates require workplace adaptations for employees with severe disabilities (SGB IX), but practical realization varies considerably across sectors and branches.

Establishment

At the establishment phase, a general orientation towards flexible and accommodation practices for all workers is the main organisational strategy in place to secure the integration of workers with a wide range of limitations. A flexible schedule is the main facilitating measure put in practice by the companies to favour reconciliation between family and work. In addition, companies can offer longer periods of leave for caregiving responsibilities while the lack of company childcare facilities is cited as a disadvantage.

Another facilitation is the possibility for further adjustment of working hours to making them flexible according to the needs (DE_Int15). Although it is not formalized within the companies and there is not a statutory law on paternity leave, it is supported and encouraged in some organizational contexts even though its planning depends on position and responsibilities. While there is no statutory entitlement to paternity leave, fathers (as well as mothers) can apply for parental leave (BEEG).

The establishment phase shows how the interviewed organisations attempt to support health-limited employees through practical interventions. Some larger companies have introduced external counselling services providing comprehensive assistance, including for mental health and caregiving concerns, underscoring a holistic understanding of employee wellbeing. As described: "This free counselling service really covers EVERYTHING... employees can get help somewhere else, separate from us." (DE_Int01).

Age-related stereotypes can persist in some organizational contexts as barriers during establishment, notably the perception that older workers are less technologically capable. A tax consultancy partner illustrated this prejudice humorously: "Older employees are technically far inferior to younger ones... 'Where do I press?'" (DE_Int07). Despite this, age diversity is recognized as an asset for knowledge transfer, with mutual learning between younger and older colleagues. German anti-discrimination law (AGG) formally prohibits age discrimination. However, public administration interviews noted concerns about training investment for near-retirement employees, reflecting practical limitations rather than legal restrictions. The integration of older workers into the establishment phase can sometimes be shaped by a tension between legal equality frameworks and the presence of age-based stereotypes that influence managerial decisions and resource allocation.

Exit

Within the broader context of German labour law, with protections related to employment termination and disability accommodation, exit from the workforce due to health limitations is regulated to avoid abrupt dismissals. Retention strategies from some of the German employers we interviewed actively encourage older workers to remain beyond retirement age to preserve organisational knowledge. One HR specialist explained: "We have a department head who is now retiring but will remain in an advisory role. That is invaluable because expertise disappears otherwise." (DE_Int01). The example involves a leadership role, a position where knowledge and networks are often crucial. It might also be challenging to find replacements for specific positions, which is a reason for retention of specific older workers. A telling example comes from an interview with a recruiter, where companies commonly propose attractive part-time arrangements for older staff. As one interviewee explains, "So currently, there are some very lucrative part-time offers for older employees. (...) That means that you can leave the company earlier, before you reach retirement age, so to speak. Exactly." (DE_Int12).

Germany's national policy environment is characterized by a legally dense framework that both protects older workers and shapes their exit pathways. Economic and institutional limitations, such as pension reductions for early retirement, frequently limit older employees' actual freedom of choice. The Allgemeines Gleichbehandlungsgesetz (AGG) guarantees anti-discrimination protections based on age, mandating organizations to provide equal opportunities. The regulations concerning retirement are fairly complex in Germany. For instance, if both parties agree, persons can continue working past the statutory retirement age or retire earlier but receive a smaller pension. Although these regulations are supposed to provide freedom, in practice they may restrict people's options. For example, some feel under pressure to retire early, while others are unable to continue working even if they so choose. Financial considerations are also crucial: pension benefits can be increased by continuing to work, but

they can be decreased by retiring early. The interview data reflects this tension, highlighting how incentive systems promote early exit while statutory minimum retirement ages and pension reductions regulate the timing and consequences of such exits.

4. The Norwegian Case

4.1. Policy context

Norway is widely recognized as a social-democratic welfare state characterized by universalism and egalitarianism (Esping-Andersen, 1990), and a well-regulated labour market aimed at promoting equality and inclusion. The welfare system provides mostly universal income support and benefits, with some means-tested exceptions, for individuals unable to work, retired, or with insufficient income. Employment protection legislation (EPL) applies to all employees (OECD, 2013), and the Working Environment Act safeguards against workplace discrimination. The Gender Equality and Anti-Discrimination Act (2018) extends protection across multiple grounds, including gender, pregnancy, parental leave, caregiving, ethnicity, religion, disability, sexual orientation, gender identity and expression, age, and intersecting grounds.

Work-life balance is a highly prioritised policy goal in Norway. Compared to other European countries, Norwegian employees have fewer hours at work, long parental leave (European Commission, 2023) and high kindergarten coverage combined with heavily subsidized childcare (OECD, 2015).

All parents are entitled to parental leave, 49 weeks with full pay or 59 weeks with 80 per cent pay, if they fulfil the requirements¹. The parental leave benefits are based on pensionable income and paid by the Norwegian Labour and Welfare Administration. Although long-term care for the elderly is a universal welfare right in Norway, work-life balance initiatives are generally less attuned to the needs of older workers than those of working parents. The Norwegian Municipal Health and Care Services Act (2011) assigns municipalities responsibility for long-term care, including home nursing, practical assistance, day activities, assistive technologies, and institutional care. Services are primarily funded through general taxation, supplemented by regulated user fees. Recent reforms, driven by demographic pressures and workforce challenges, aim to support ageing in place and improve coordination between health and social care. While the Norwegian welfare state holds formal responsibility for elderly care, in practice this is largely shared between the state and relatives (Ervik, 2019).

In case of sickness absence, the employer is obligated to finance the employee for the first 16 days; afterwards the sickness leave is covered by the Norwegian National Insurance Scheme². Dismissal due to sickness is prohibited during the first year of leave. After one year, it may be permitted under specific conditions, such as documented efforts to accommodate or relocate the employee. Persons

¹ Must have had pensionable income (incl. relevant benefits) for 6 of the last 10 months, earned at least EUR 5,196/year, and reside in Norway as a member of the National Insurance Scheme. For self-employed parents, parental allowance is based on average pensionable income over the past three years. Those not eligible may receive a flat-rate benefit of EUR 8,106 (NOK 92,648), provided they reside in Norway.

² As a part of the National Insurance Act, employees whose occupational activity have lasted for at least four weeks are entitled to sickness pay if incapable of working due to illness. Nationality and years of residence are irrelevant if this criterion is met. Daily cash benefits for employees are equal to 100 per cent of their income and are paid from the first day of sickness for up to 260 working days (52 weeks).

with a reduced work and earning capacity due to a long-lasting illness, injury, or disability, can apply for disability benefits that will be paid by the Norwegian Labour and Welfare Administration. While financial support for sickness and disability is generous by European standards, eligibility requirements mean that part-time workers, low-income earners, and the self-employed are particularly vulnerable during prolonged illness or disability.

According to the Norwegian Working Environment Act, employers may dismiss employees at age 70 in the public sector and between 70–72 in the private sector without objective justification. Norway has replaced a fixed retirement age with a flexible retirement window from 62 to 75 years. Pension eligibility generally requires five years of residence and work, while early retirement (before 67) demands a pensionable income above a minimum threshold. Full pension entitlement typically requires around 40 years of accrual. Although Norway offers relatively generous minimum-income protection for older adults, those without full accrual, such as part-time, low-income, or self-employed workers, may be particularly vulnerable (Pedersen, 2025).

4.2. Findings

Recruitment

Findings from the interviews with Norwegian employers indicate that care responsibilities and age do not appear to negatively influence recruitment preferences. On the contrary, such characteristics were often described as contributing to workplace diversity, and several employers emphasised the value of having employees at different stages of life.

This perspective was particularly evident in discussions about parents of young children. The Norwegian employers rarely referred to the current or the potential care responsibilities of the new employees as a problem. Most of the interviewees indicated that care responsibilities are a part of the diversity in the workplace and the companies can benefit from having workers in the different stages of life: “They have had children in kindergarten and school, they have sick children every week. We are very generous in relation to that, we just have to have that... But I think we must have that generosity that we are in different phases of life. You have to have that room for action, then. And it is extremely important.” (NO_Int06).

Some of the employers indicated directly that it would have been very shortsighted of them to exclude employees just on the basis of their potential care responsibilities: “But I don't want to miss out on a good employee, because I think that the person in question may disappear. Whether it's pregnancy leave or something. It would be terribly stupid of me. And I rather see it as an investment to give the right person. And then we get to solve what comes of any challenges. And we'll find out.” (NO_Int01).

Flexibility was repeatedly mentioned as a common approach to changes in care responsibilities: “But if you apply for that job and have three children, then we won't give up on it. Then we just make sure that you can maintain flexibility.” (NO_Int03). This flexibility is clearly dependent on the nature of the job and especially whether it requires a regular contact with customers etc. While younger employees with care responsibilities were generally viewed positively, several employers also emphasised the importance of maintaining an age-diverse workforce. A balanced mix of ages, from mid-30s to over 60, was described as beneficial for organisational learning, collaboration, and knowledge transfer. For example, one recruitment agency emphasized generational complementarities: “Slightly younger employees respond quickly, are good at learning data-driven tasks, while older workers can teach them a number of things... It has been very healthy to have that mix.” (NO_01).

Despite some difficulty adapting to rapid technological change among older workers, many organisations aim to maintain a broad age spectrum. Public administrations actively seek both junior and senior employees to avoid “just becoming old men” in the workplace (NO_06). The emphasis is on competence rather than age, although practical challenges remain, especially as the average age of some sectors like public transport approaches 50. This demographic concern drives recruitment to ensure skills transfer to younger generations while preserving older workers’ knowledge. Norwegian organizations articulate explicit efforts in demographic balance and intergenerational workforce planning.

None of the employers mentioned whether they actively sought to recruit people with disabilities or people with health-related limitations, nor did they express any particular preferences regarding the recruitment of these groups. This may reflect the broader inclusion policy in Norway, which does not specifically address the recruitment of persons with disabilities or those with health problems.

Norwegian employer data demonstrate a clear national and organizational emphasis on inclusive, health-supportive environments. Recruitment practices reflect adherence to disability and health inclusion recommendations, with disclosed disabilities accounted for alongside qualifications. This balanced approach aligns with Norway’s strong national policies on workplace inclusion and health promotion.

At the same time, some employers still do not manage to incorporate these regulations as an inherent part of their recruitment strategy, ending up with several parallel processes: one for the selection of the ‘desired candidate’ and a separate selection that aligns with the law requirements. As the interviewee [NO_Int08], an employer working in the Norwegian public service, states: “We assess applicants against the criteria in the job advertisement. Then we also have personal characteristics, where we have experienced what is important in these positions. It is difficult to find it when you filter out applications. So when we filter out, it is primarily whether they meet the target requirements. And then we call in those we feel have the best applications. And then we select the best overall. So then eight or nine people are often called in. And if we have to bring in someone of foreign origin or with reduced functional ability, then they can come on top.” (NO_Int08).

This approach unveils that the persons with disabilities (as well as ethnic minorities) come ‘on top’ rather than as an integral part of the recruitment process.

Establishment

While recruitment practices provide insight into initial employer preferences, it is equally important to examine how employers approach the establishment phase, namely, how they support employees in developing and maintaining their position over time. As in the recruitment phase, employers are particularly concerned with accommodating the needs of parents with young children. However, public institutions - more than the private organizations - are opened to parents with children: “But we are [a Norwegian public institution], so of course people should be able to have children. It is good for Norway that people have children. [...] It happens, and it should be allowed to happen.” [NO_Int06]). Although it can happen that in small units where the budget does not allow to cover with a temporary replacement of absent colleagues, the burden of work tasks falls on the rest of the colleagues creating discontent. But once again, it is considered something to handle.

Work from home and flexibility in the program is also practiced in public institutions. One of them [NO_Int12] added that they schedule meetings between 9.00 and 15.00 in order to favour flexibility: “If you want to work from home today, you work from home today. And if you need to go early, you go early. We have no meetings before nine o'clock. And we have no meetings after three. So it should be entirely possible to combine. That is my personal observation.” (NO_Int12).

At the same time, it also emerged that works involving customer contact could impose limitations on flexibility and entail requirements for physical presence: "But people also work outside with the customers. So we are used to people not being ... It is one of the limitations. If you work with a customer who demands that you are at work from nine to five, then you have to be there. That is in a way the framework of the role." (NO_Int03).

The overall picture nevertheless suggests that the cultural and legislative framework seem to be the main facilitator for the inclusion of parents with care duties even in the cases in which is observed their absence could create some problems to the business or the institution.

In addition to caregiving responsibilities, employers also address health-related needs as part of their broader inclusion efforts. Companies convey a culture of openness and mental health prioritization, substantiated by extensive health insurance coverage inclusive of mental health services. A public transport employer highlighted this value: "So it is an organization with an incredibly inclusive working environment. And one of our most important values is that we are open. We are open in the form of mental health. It is valued very highly. And we mark World Mental Health Day with a lot of focus on talking together and things like that." (NO_Int10).

In addition to coverage, the cultural acceptance and destigmatization of mental health challenges encourage open dialogue and employee support. The organization's commitment extends beyond healthcare access to fostering a climate where mental health is openly discussed and respected as a core value.

Norwegian organizations demonstrate greater flexibility and inclusiveness in establishment practices, with less emphasis on rigid age categories. Respondents speak of consciously maintaining age diversity and preparing for generational changes through recruitment and internal training initiatives. For instance, a public transport company highlighted: "We have turned our focus around in recruitment to prepare for generational change, so skills can transfer to the younger generation." (NO_Int10)

There appears to be considerable scope for individual arrangements nearing retirement age, with older employees sometimes transitioning to part-time or flexible pension contracts while remaining engaged. This flexibility is embedded in a socio-cultural context valuing lifelong employment and autonomy, supported by national policies facilitating extended labour market participation. Such facilitators contrast with the more rigid transitions observed in other countries. This may reflect the tight labour market in Norway, where many sectors are experiencing significant labour shortages. In such a context, flexibility is often regarded as a key factor in being perceived as an attractive employer.

Results from the Norwegian case reveals an overall inclusive culture valuing qualifications alongside adaptations for functional variations. Employers often identify health-related risks such as recurrent sick leave rather than disability per se. Participation in public projects for trainees with reduced functional abilities signals governmental and organizational commitment to integration (NO_Int08). The emphasis on flexibility and individualized adjustments during establishment phases supports retention and employee belongingness.

Exit

Norwegian employers report substantive flexibility around retirement age, with individuals sometimes working into their seventies voluntarily or through pensioner contracts. The cultural norm recognizes older employees' knowledge as compensatory for physical or technological limitations. One recruiter noted: "I've employed people who say they'll work until they're 70. Older ones aren't as fast but compensate with a lot of knowledge." (NO_04).

Additionally, the government's supportive pension and labour market policies facilitate prolonged working lives and flexible retirement arrangements, aligning with organizational practices aimed at managing demographic changes and skill transfer effectively. There appears to be considerable scope for individual arrangements nearing retirement age, with older employees sometimes transitioning to part-time or flexible pension contracts while remaining engaged: "So some people really notice that the end [of the work life] is coming. And are prepared for it. Others refuse to realize it and just work at a really high mode until the end. And then no adjustments are made if there is no demand for it. And then you work out your birthday when you turn 70." (NO_Int12).

This flexibility is embedded in a socio-cultural context valuing lifelong employment and autonomy. Additionally, facilitators include the government's supportive pension and labour market policies facilitate prolonged working lives and flexible retirement arrangements, aligning with organizational practices aimed at managing demographic changes and skill transfer effectively.

5. The Polish Case

5.1. Policy Context

In the political transition following 1989, Poland underwent a series of profound transformations that affected multiple sectors of society. Today, Poland, along with several other Eastern European countries, exhibits a hybrid welfare state model that combines liberal and conservative-corporatist elements, while also retaining certain universalistic features inherited from the communist era (Aspalter, Jinsoo, and Sojeung, 2009; Aidukaite, 2009; Aidukaite, 2011). EPL in Poland is regulated by the Labour Code, which defines a set of discrimination grounds, including sex, age, and disability.

Legislative measures aimed at supporting work-life balance have primarily focused on childcare, offering a broader range of entitlements to parents compared to those caring for dependent adults. Insured parents are entitled to parental leave and allowance of children up to the age of seven. This includes maternity leave and allowance granted to the mother but with the possibility of partial transfer to the father; paternity leave and allowance, granted to the father; and parental leave and allowance, which is available to both parents. In addition, parents may take childcare leave without allowance up to 36 months. Since the end of 2024 the Government introduced new benefits for employed parents of children between 12 to 35 months which consists in a monetary benefit transferred to the employed parent or to a childcare provider to alleviate the parents' financial burden and facilitate continued labour market participation. Another important policy is Family 800 Plus, which grants families with dependent children up to the age of 18 a benefit consisting of PLN 800 per child, regardless of income. In 2023, a significant policy shift extended the right to request flexible working arrangements to all employees with at least six months of tenure with the same employer. Previously, this right was restricted to parents of children under the age of eight. That same year, two additional types of leave were introduced: an unpaid five-day annual leave for individuals providing care to a relative or a cohabiting person, and a family emergency leave of two days or 16 hours, which is remunerated at 50% of the employee's salary. For workers providing long-term care to an older family member, the Care Benefit remains a key support compensating for lost earnings by covering 80% of the worker's base salary. The asymmetry in Polish policy design results in a more robust protection for working parents, while adult carers often face significant challenges in reconciling paid employment with caregiving responsibilities. Consequently, many are compelled to exit the labour market due to insufficient support structures (Perek-Białas & Ruzik-Sierdzińska, 2024).

In case of sickness, insured workers are entitled to a sickness allowance amounting to 80% of their average monthly salary, and 100% if the incapacity is caused by pregnancy or by an accident occurring on the way to or from work. The sickness allowance is payable for up to 182 days. In specific cases, such as pregnancy-related incapacity or certain long-term medical conditions, this period may be extended to a maximum of 270 days. Dismissal is not permitted during an employee's period of certified sick leave. However, once the period of protection ends, the employer is legally entitled to terminate the employment contract if the employee remains unable to resume work. Access to disability benefits requires two separate certificates. The first, provided following a medical assessment, determines the degree of disability and includes recommendations on employment, training, and access to services. The second, prepared by the Social Insurance Institution, confirms partial or total incapacity for work and serves as the basis for granting a disability pension. To promote the inclusion of persons with disabilities in the labour market, the Polish government introduced a quota system requiring employers with 25 or more employees have the legal obligation to ensure that at least 6% of their employees are persons with disability. Employers who fail to meet this threshold are required to pay a fee to the State Fund for the Rehabilitation of Disabled Persons. The legislation also provides financial incentives and support measures for employers who hire workers with disabilities.

To encourage employers to hire and retain workers aged 50 and above, Act on the Labor Market and Employment Services (2025) provides for an exemption from social contribution payments for a period of 12 months, as well as wage subsidies for 12 months (for unemployed persons aged 50–59) or 24 months (for unemployed persons aged 60 and over). In addition, older workers have access to a range of employment services, including job placement, career counselling, training, assistance in raking up subsidised employment, one-off grants for business creation, internships, socially useful work, and participation in special programmes (National Report – Poland: Information on the actions taken for the benefit of elderly people, 2021). As in many other countries, Poland has revised its retirement legislation. The reform included changes to the early retirement system and raised the statutory retirement age to 65 for men and 60 for women.

5.2. Findings

Recruitment

Recruitment practices across organizations demonstrate both convergence and variation in how inclusion is perceived and enacted. A common pattern is a competence-based approach, where job-relevant qualifications, skills, and experience serve as the principal selection criteria. However, the degree of procedural formalization differs considerably across organizational types. Large organisations in our sample exemplify structured, multi-stage recruitment, while smaller organizations often rely on informal, experience-driven strategies.

In some larger firms, inclusion is embedded through transparent, multi-step screening and efforts to ensure “psychologically safe” (PL_Int01) interviews that reduce the risk of bias. Some apply rigorous technical verification and highly institutionalized HR systems featuring job grades, defined pay bands, and internally tagged candidates that are in place to ensure procedural consistency. In the public sector, recruitment is characterized by strong legal–procedural formalism typical of the civil service: binary qualification screening, predefined point matrices, and fully minuted protocols: “You have to write before the interview all the questions... what is to be assessed, how many points per question... then a protocol” (PL_Int07).

In contrast, smaller companies in our sample illustrate an informal, relational model where selection depends on the owner's personal judgment, emphasizing prior experience and interpersonal openness. Some NGOs are gradually professionalizing their practices through digitalization, using Applicant Tracking Systems (ATS) to structure applications and automate pre-verification: "Since last year we're on ATS... it generates a link... we create those questions... about availability, education, experience... so it's a quick pre-verification" (PL_Int08). This technological adaptation compensates for the inaccessibility of state-run recruitment channels such as the Labour Office platform, when technical problems make it "inaccessible... from the branch level" (Int08).

Poland presents a mixed picture where large firms tend to demonstrate proactive gender and disability inclusion initiatives, supplemented by manager training combating bias during recruitment: "We're preparing a project to hire more people with disabilities... the recruiter's role is significant in showing that there's no obstacle here" (PL_Int5). These cases show that flexibility and individualized adaptation, rather than rigid procedures, are key enablers of inclusive recruitment. Cultural misconceptions persist, with disability often narrowly understood as physical impairments, marginalizing invisible disabilities (PL_Int08). Inaccessible physical environments compound recruitment challenges, reflecting the limitations of some organizational strategies.

A recurrent policy–practice gap is visible in the employment of people with disabilities. While Polish law provides financial incentives (e.g., PFRON - State Fund for Rehabilitation of Disabled People), organizations often fail to operationalize these schemes due to administrative complexity or lack of expertise: "I've had cases, for example, where we had a man with severe disability, and the company wasn't using any deductions from PFRON [the State Fund for Rehabilitation of Disabled People] because the accountant didn't know how to do it. Those are the formal... well... flawed processes. The forms have to be filled out a certain way, submitted on time. There are just so many requirements from PFRON's side to get the deduction that employers give up at that stage." (PL_Int08).

In relation to care responsibilities, organizations exhibit formal openness although largely without proactive practice. Legal and institutional frameworks create a formal inclusive environment by prohibiting questions about caregiving, which protects candidates but may restrict tailored organizational support. As one recruiter explained, "Under Polish law it's illegal to ask. (If people have children) We simply cannot ask such questions... there is some promotion of family support, but is it strongly visible? Probably not." (PL_Int10). This legal neutrality creates tension between privacy rights and practical inclusion: HR managers cannot plan flexible arrangements without disclosure, which is difficult to address during recruitment processes. Still, cultural openness toward parents, particularly mothers returning to work, was widely recognized: "So in fact, I'd say companies — at least the ones I've worked with — are more and more open toward parents wanting to return to work. And I think candidates really appreciate this." (PL_Int 9).

Yet, full normalization of parental inclusion remains incomplete. Communication gaps persist in some companies, especially around fatherhood: "From the employer's point of view, it's pretty much all the same who takes it; the challenge is sometimes just the communication. Some young dads, once they know their partner is pregnant, do communicate it early. And that's probably also a matter of educating employees—that it's good to flag things in advance." (PL_Int11). The public sector appears as an inclusion anchor due to institutional guarantees: "A large portion of women more willingly go into the administration, because they know it's an employer that won't cause problems in the event of pregnancy, that the position will be waiting, that when she returns after pregnancy she won't be fired at the first opportunity." (PL_Int13). Procedural adaptation for care-related absences acts as an important facilitator through mechanisms to maintain workflow during extended absences,

preventing resentment toward employees on leave. This supports inclusion by normalizing care absences as part of the employment cycle, rather than as disruptions.

Across interviews, cultural facilitators also emerged. Participants highlighted growing recognition of diversity's organizational value and of gender balance as conducive to well-being: "I think diversity in terms of gender is good for the well-being of employees." (PL_Int15). Participants from both corporate and public sectors described fairness, cooperation, and openness as "normal expectations rather than exceptional practices" (PL_Int09). Generational inclusion surfaced as another dimension, with managers adapting leadership to younger employees' expectations.

Finally, individual managerial agency seems like a key enabler of inclusion. Managers and recruiters often rely on reflective judgment beyond formal credentials, emphasizing learning capacity, communication, and openness. Recruiters also described acting as bridges between clients and candidates, negotiating fairness in cases where client preferences risked exclusion: "Sometimes you need to explain to the client why rejecting someone for their accent or age doesn't make sense." (PL_Int 10). Such ethical interventions exemplify how inclusion can be enacted through everyday managerial decisions.

Significant barriers to inclusion remain evident across cases. These obstacles operate at multiple levels: structural, cultural, and relational, limiting the capacity of organization to achieve equitable and inclusive recruitment practices.

At the structural level, a persistent barrier is the overreliance on formal education credentials. While intended to ensure fairness and objectivity, such reliance also hinder potential efforts to put into place proactive measures to recruit candidates with vulnerabilities. As one manager remarked, "Universities still matter for credibility" (PL_Int2), while another emphasized, "For me, the most important things are education, work experience, and language skills. ...I don't care if a candidate lives alone or has a preschool-aged child—that doesn't influence my decision." (PL_Int1).

The absence of coherent human resource management policies constitutes another constraint. Without strategic planning for recruitment, training, and career development, inclusion efforts remain fragmented and reactive. As one public-sector representative noted: "We do not have a human resources management policy at all, which shows itself, one, in these matters of employment, in working conditions, and two, also in employee development, right? There is no idea for trainings, no idea for recruitment, no idea for promoting employment in our ministry, so it is hard in this respect." (PL_Int7).

At the cultural level, recruitment through personal networks, while acting as a solution for specific hirings, can also turn into cultural barrier to inclusion as reliance on informal, trust-based hiring networks in small organization can weaken equal opportunity.

Gender and family-related biases also remain embedded in hiring. Some managers reported they noticed in their experience reluctance to employ women due to anticipated maternity absences: "He had three women in the department who became pregnant (...) and he feared he wouldn't have anyone left to carry out the work." (PL_Int5). Furthermore, it was described the persistence of gendered stereotypes that can undermine equitable access: "When a young woman comes to an interview wearing a wedding ring, some people still assume she will soon start a family." (PL_Int5).

Organizational pressures and managerial discretion can also undermine inclusion, even in otherwise robust systems. Hiring under time constraints or without adequate consultation increases the likelihood of misjudgements: "I felt pressure to hire quickly and went ahead despite doubts." (PL_Int6).

Together, these findings suggest that inclusion barriers are not primarily attitudinal but systemic. They stem from the interplay of bureaucratic rigidity, inappropriate infrastructure, procedural over-standardization, and sometimes cultural stereotypes. While many organizations express a formal commitment to equality, practical inclusion continues to depend heavily on individual initiative rather than institutionalized practice.

Establishment

Formal onboarding frameworks and structured induction processes serve as key facilitators of inclusion. In larger organizations and public institutions, new hires go through standardized orientation programs that combine procedural clarity with peer mentoring and training continuity. Such frameworks ensure predictability and reduce anxiety for employees entering complex bureaucratic or technical environments. One respondent explained that “The team is personally invested in getting the newcomer productive ASAP: less overhead for them and sooner help from the new person. So the team “adopts” the person, helps with product context and everyday stuff; any team member can help with non-product questions. The buddy covers the early period, but really the whole team invests.” (PL_Int4).

Procedural inclusion is supported through structured feedback mechanisms, probation reviews, and mentoring systems. Regular follow-up and corrective support allow employees to adjust their performance and feel guided rather than judged. One manager described this as “We have a culture of feedback, and those conversations are held so that the employee knows where they stand — whether the onboarding is going well, whether they’re performing their duties properly, what they should work on, and what they can focus on to do even better. They get that kind of feedback from us.” (PL_Int15).

Some corporate respondents also reported monitoring gender and parental leave uptake, as well as continuous professional development schemes. Retraining opportunities and personalized development plans were also reported, particularly in the public sector, where training is tied to formal evaluation cycles. Post-hire monitoring by recruitment agencies and internal HR audits ensure accountability and prevent exclusionary drift during the early tenure period.

Gender equality and family-friendly attitudes are also important elements of inclusive culture. Generational understanding further enhances inclusion, with leaders adjusting management styles to the expectations of younger employees: “a recurring challenge over time — is hiring younger generations, yes? That represents the biggest challenge, because we have to adapt to the expectations of candidates and later of our employees in such a way as to manage them so that they feel good in their work — that they stay with us, that they remain part of our company.” (PL_Int15).

At the individual level, inclusion is most strongly facilitated by empathetic, reflective leadership and peer mentoring. Supportive supervisors play a pivotal role in adapting work expectations, offering flexible arrangements, and fostering psychological safety. Such individualized approaches help integrate employees with diverse needs and experiences, transforming inclusion from a policy goal into lived organizational practice. Still, individual-level challenges remain: conflicts with authority or personality mismatches, burnout and self-limiting expectations among underconfident employees, overreliance on informal evaluations or “chemistry” that risks subjectivity and inconsistency.

Procedural barriers remain significant. Inclusion often depends on the goodwill and availability of individual managers. Limited onboarding capacity due to workload and staff shortages can lead to rushed or inconsistent implementation. Furthermore, equality monitoring frequently ends at pay analysis, without tracking other diversity dimensions such as ethnicity or disability.

Cultural barriers persist where diversity awareness has not yet become institutionalized. The absence of formal diversity training or policy limits cultural learning. Hierarchical rigidity and managerial blind spots can reinforce exclusionary dynamics, particularly in environments where intercultural representation is minimal. Generational tension also arises when younger employees' expectations for flexibility clash with traditional work ethics. An asymmetry between the national cultural context and organizational values can also be a barrier when implementing measures accommodating various vulnerabilities: "When we received an HR award for implementing menstrual leave, people online edited our photos, adding a bloody background. And there were many more such situations. This hate is often directed at women". (PL_Int01).

Overall, the establishment phase demonstrates that inclusion is sustained not only through policies and procedures but through relationships, learning, and daily interactions. Formal onboarding systems and mentoring structures lay the foundation, but the quality of inclusion ultimately depends on the interplay between structural supports and individual initiative.

Exit

Employers in Poland engage in exit phase planning that accommodates caregiving leave and other extended absence periods, reflecting an understanding of diverse employee needs. However, practical challenges in communication and implementation persist, particularly regarding invisible disabilities and gender-caregiving intersections. The exit phase is shaped by formalized workflows aiming for continuity but constrained by infrastructural and cultural barriers that influence older vulnerable workers' retirement timing and options.

Poland's national frameworks epitomize a regulatory approach to inclusion, with stringent anti-discrimination laws, gender equality policies, and disability inclusion mandates embedded in recruitment and employment policies. However, the bureaucratic complexity and procedural demands inherent in these frameworks present significant implementation challenges. Employers express difficulties navigating these legal requirements and cultural stereotypes about gender and care, about age, and disability vulnerability persist in some companies despite formal protections.

6. The Romanian Case

6.1. Policy context

Romania has a hybrid welfare state model and has experienced major transitions of its labour market and employment policies since the 1990s. With an often fragmented and discontinuous policy towards people in vulnerable situations, it also has a lower level of employment protection legislation (Ebbinghaus & Weishaupt, 2022), although this can vary across different groups. The Romanian policy landscape frequently prioritizes basic employment support and financial incentives for employers over inclusive ALMPs (Nicasie, 2021). Its mix of policies includes ALMPs such as training, employment incentives, business start-up aid, and subsidies to employers. Vulnerable groups often face inconsistent access, and actual integration falls short of stated policy goals. In recent years there had been a gradual shift toward targeted support, but structural challenges persist.

Policies and measures, for example, can in some instances be less adjusted between domains (employment, health, education, social services) and cannot offer coherent support for a particular vulnerable situation across policies (Eurofound, 2022), while at the same time there is unequal support for different vulnerabilities, some faring better than others for inclusion and integration on the labour market. While the policies focused on extending the duration of working life have

developed in Romania since 2015 (from the first National Strategy focusing on active ageing), gaps in offering care services or providing explicit workplace accommodations guidelines are still persistent or evolve at a slower pace. This connection between care services availability, care provision and labour mobility has been demonstrated in literature (Rogoz and Sekulova, 2021), but it fails to be recognised and adjusted through policy measures. On the other hand, Romania's policy framework focused on inclusion of persons with disabilities (PwD) on the labour market has evolved significantly, moving from a simple quota system to more comprehensive requirements for active recruitment and workplace accommodation.

At the recruitment stage, Romania's regulatory framework contains robust anti-discrimination provisions to facilitate equitable labour market entry for vulnerable groups. Government Ordinance No. 137/2000 explicitly prohibits discrimination on grounds such as disability, chronic illness, and HIV/AIDS status across all employment dimensions, including recruitment and selection processes. Complementary legal provisions, such as Anti-Discrimination Law No. 137/2000, reinforce prohibitions against exclusion based on disability during hiring, promotion, remuneration, and training (ANDPDCA and World Bank, 2019). Employers exceeding 50 employees are also mandated to allocate a minimum of 4% of their workforce to persons with disabilities under Law No. 448/2006, with failure resulting in financial penalties or mandated investments in services supporting disabled workers (Order No. 28/2025). This statutory quota aims to directly influence recruitment practices, while the requirement for collaboration with NGOs enhances the matching of job vacancies with candidates possessing disabilities, reflecting a proactive strategy to address labour market segmentation. This new requirement to include coordination with NGO's acknowledge a general issue related to access to recruitment, while at the same time lays the foundation for a more comprehensive monitoring of companies' activities to expand and improve accommodations for PwD. This monitoring from NGO actors could on the long term provide a better foundation for integration (establishment) of PwD in the hiring organizations.

Despite these measures, older adults (particularly those aged 55–69) face persistent recruitment challenges, as evidenced by employment rates well below EU averages (Eurostat, 2024, *lfsa_ergan*). Legislative reforms, such as the flexibilization of early retirement schemes and the absence of statutory barriers to post-retirement employment, theoretically enable greater labour market engagement beyond conventional retirement thresholds. However, socio-cultural norms and sector-specific vulnerabilities—especially prevalent in informal agricultural work—continue to impede older workers' access (FES 2015). Gender-differentiated effects are also salient, with statutory protections against discrimination based on maternity or future maternity supporting women's access despite caregiving constraints (Law No. 202/2002).

Within the establishment phase, Romanian policies employ diverse mechanisms to retain vulnerable workers by fostering accommodating work environments and promoting flexible employment arrangements. Law No. 448/2006 outlines employer obligations for integrating persons with disabilities, not only via employment quotas but also through requirements for reasonable accommodation, workplace adaptations, flexible scheduling, and provision of assistive technologies. Training measures—including vocational rehabilitation, qualification, requalification, and specialization—further aim to enhance employability and career development opportunities (ANDPDCA and World Bank, 2019). Despite this comprehensive legal remit, empirical evidence suggests a persistent gap between formal statutory frameworks and effective workplace integration for persons with disabilities, indicating implementation limitations (Baciu et al. 2016; Grigoraş et al. 2021; OECD 2025).

Health-related vulnerabilities receive legal recognition in recent amendments to the Labour Code (2025), which enhance anti-discrimination and anti-harassment protections, formalize accessibility standards, and establish stricter procedures for medical assessment and workplace adjustments. Nevertheless, Romania lacks a coordinated national strategy for returning workers post-sick leave, resulting in discretionary employer-driven reintegration and sectoral uneven support (Copsey, 2022; EU-OSHA, 2017; Popa et al., 2019).

Older workers benefit from active ageing strategies embedded in national policy, which encourage lifelong learning, flexible work modalities, and intergenerational knowledge transfer (Law No. 360/2023). The award of additional pension points for extended contribution periods incentivizes sustained labour market participation, though labour market retention remains challenged by entrenched social expectations and suboptimal working conditions (FES, 2015).

Carers and parents receive substantive legal entitlements to balance employment and familial responsibilities. Parental leave provisions guarantee paid leave until the child reaches two years of age, with differentiated leave rights between parents, supported by high wage replacement rates (85%) (Emergency Order No. 111/2010). Additional leaves for childcare in emergencies and caregiving for adults exist within the legal framework (Law No. 19/2020; Emergency Order No. 158/2005). Flexible work schedules incorporated into the Labour Code further promote work-life compatibility. Despite these formal rights, the dearth of accessible public childcare and social infrastructure significantly constrains women's labour market retention, resulting in elevated inactivity rates tied to caregiving duties (Popescu, 2014; Köhler and Crusmac, 2016).

In the exit phase, Romanian legislation provides flexible retirement mechanisms and safeguards against premature or involuntary labour market exit. Early retirement is conditionally accessible for workers within five years of statutory retirement age, contingent on contribution history, enabling voluntary withdrawal for those unable to maintain full-time work (Eurostat, 2024). Importantly, retirees may combine pension benefits with ongoing employment income without legal restriction, facilitating phased retirement models. Nonetheless, actual labour force participation rates among older cohorts remain low, influenced by socio-cultural and economic factors that encourage early exit, like the low quality of employment (FES, 2015), as well as ageism and a history of encouraging early retirement through various supportive schemes.

From a health perspective, legal norms secure employment continuation by forbidding dismissal during sickness or caregiving leave, backed by stringent medical assessment requirements and reasonable accommodation duties (Labour Code amendments, 2025). However, the absence of national reintegration protocols limits systematic support for re-entry post-health-related absence, thereby potentially impeding sustainable retention.

For caregivers, protections against dismissal during parental or care leave safeguard job security during extended absences. Yet, limited availability of supportive public care services continues to affect labour market exit decisions, disproportionately impacting women's long-term employment trajectories (Dohotariu, 2018; Robayo-Abril & Rude, 2025).

Romania presents a legislative framework that comprehensively addresses the retention of vulnerable workers through targeted legal measures across recruitment, employment, and exit stages. Anti-discrimination laws and employment quotas underpin equitable recruitment, but while formal policies could be in place, their application and implementation are often discretionary. While workplace accommodations and flexible policies are mandated through legal provisions, often employers face contextual barriers that impede these efforts (Grigoraş et al., 2021). Exit phase measures provide options for phased retirement and protections against adverse termination due to health or caregiving

situations. Nevertheless, policy implementation gaps, fragmented institutional support, and socio-economic barriers persist (Copsey, 2022; FES, 2015; Popescu, 2014).

6.2. Findings

Recruitment

In the Romanian context, facilitators of inclusion during recruitment are found primarily within multinational corporations (MNCs) and large private employers that have adopted structured diversity and well-being strategies. Formal anti-discrimination legislation explicitly prohibits questions about maternity status or family plans during recruitment, and several multinational companies have institutionalized internal procedures to ensure compliance and promote gender balance.

Two examples illustrate these proactive approaches. An IT company (RO_Int07) deliberately applies a gender-balanced shortlisting and evaluation process, ensuring that an equal number of men and women are invited to interviews and that female candidates are always assessed by a panel including at least one woman. Similarly, a large multinational in the beverage sector (RO_Int03) has reframed job descriptions to attract more women into male-dominated roles: “Let’s not say ‘we’re looking for a colleague’ [masculine form], but ‘we’re looking for a female colleague’. [...] We want to write the job advertisement with gender balance, so that you, as a woman, can see yourself in it. ... Benefits are more appealing to women — they might have a child, need flexibility.” (RO_Int03).

Facilitators related to health limitations emerged mainly in the policies of large corporations that import transnational well-being standards. These include structured health programs, access to therapy, and workplace well-being activities. A representative of a large private company described these initiatives as integral to the corporate culture: “We have actions in the area of well-being year after year... therapy, Pilates at the office, medical subscriptions, massage at the office.” (RO_Int08). Even though these practices do not explicitly target candidates with health limitations, they contribute to a broader organizational environment supportive of health inclusion.

Regarding ageing and intergenerational dynamics, several large employers articulated a pragmatic openness to hiring workers aged 45 and older. The key motivator was immediate productivity and reduced training costs rather than explicit diversity objectives: “We hire senior people, so we tend to hire those over 45 rather than younger... we needed people to become productive very quickly, so they didn’t pay much attention to juniors.” (RO_Int10). While this practical orientation facilitates access for older workers, it simultaneously creates barriers for younger candidates and underscores a generational divide in workforce development. Managers also reported challenges in leading multi-generational teams, often comprising up to four age cohorts, as differing expectations and work attitudes required adaptive leadership styles.

For persons with disabilities, the main structural facilitator remains the existence of national legal quotas and anti-discrimination frameworks. However, employers acknowledged a discrepancy between legislation and practice, noting that administrative burdens, limited accessibility, and low institutional support hinder effective implementation. Larger corporations are more likely to comply through formal reporting or partnerships with NGOs, while smaller firms often opt to pay the statutory compensation fee rather than recruit directly.

While some companies have well-defined strategies to increase the number of female employees, barriers to a gender balanced workforce can be found in companies such as manufacturing, production, and logistics that are considered physically demanding and traditionally and culturally are

not attractive domains for women. In these companies, diversity measures are confined to administrative or office roles: they acknowledge that in the office work the situation is more balanced, or in some cases there are more women than men, but they rarely extend gender strategies to operational domains. This suggests that women's inclusion remains occupationally segmented, limited by both cultural norms and structural constraints.

Interview data also indicate a reactive rather than strategic approach to age diversity. Some employers report efforts to create inclusive communication environments considering cultural and language differences, reflecting an awareness of complex diversity dimensions, including age and gender. However, the absence of explicit age-diversity policies can reflect a symbolic inclusion, organizational actions that acknowledge difference without transforming embedded hierarchies or biases (Kirton & Greene, 2021; Shore et al., 2018).

The most evident barriers, however, relate to the recruitment of persons with disabilities. Interviewees described structural exclusion as “discrimination by design,” referring to recruitment channels that are not adapted for candidates with disabilities and thus result in passive recruitment and underutilization of legal quotas. Quotas intended to promote employment of PwD are frequently circumvented through penalty payments instead of direct hiring. Voluntary disclosure of disability status further complicates recruitment, creating uncertainty for employers about the actual number of disabled employees (RO_Int 9).

Even among companies with formal compliance mechanisms, actual implementation remains limited. For some companies, even when aware of national incentives and legal provisions intended to encourage the employment of people with disabilities, these public supports are not used in the organization: “I know there are... facilities... we haven't implemented them, we haven't applied for subsidies.” (RO_Int1). Employers acknowledged maintaining protected units or formal partnerships but still fell short of legal targets: “We have people with disabilities, we even have a protected unit... right now 15 employees with disabilities... but we do not meet the quota.” (RO_Int6).

Participants linked these gaps to production-specific constraints: high physical demands and strict safety standards that make many roles unsuitable for certain disabilities. When specific efforts are put into place and companies developed an advanced compliance infrastructure (codes of conduct, EU-aligned updates, structured protected unit), quotas are still seen as challenging to meet because high physical demands and strict safety rules in production make many jobs unsuitable for certain disabilities: “It is difficult because it very much depends on the types of jobs. The employer is obliged to also provide suitable working conditions...” (RO_Int6).

Beyond workplace factors, barriers are amplified by national infrastructure deficits. Poor public transportation and inaccessible urban environments limit the mobility of persons with disabilities, creating recruitment bottlenecks even for companies willing to hire inclusively: “First of all, we have an overall infrastructure problem... we get stuck on other aspects, such as how people get to the office, because the route to our office—well, we are so unprepared in terms of infrastructure when it comes to integrating these people and this category into society.” (RO_Int9).

Employers also expressed concerns about organizational capacity and performance pressures, noting that inclusion often requires redistributing tasks within teams: “There is extremely high pressure on efficiency, and it is very difficult to build that balance and that context. To put it briefly, to bring a different kind of person into your team, you have to burden the rest of the team with activities that we might not manage to deliver.” (RO_Int9).

These data reveal a systemic policy–practice gap, where legislative frameworks promoting disability employment coexist with managerial logics centred on efficiency and performance. Inclusion efforts

thus remain conditional, dependent on sectoral feasibility, infrastructural accessibility, and organizational willingness to absorb short-term productivity adjustments.

Establishment

In the establishment phase, Romanian employers facilitate inclusion primarily through family-friendly policies, flexible working arrangements, well-being initiatives, and intergenerational practices. However, these measures vary in scope and consistency, reflecting differences in company size, ownership, and exposure to international corporate standards.

Once hired, employees with care responsibilities benefit from legal protections that entitle them to various forms of leave, particularly generous in the case of childcare. Large multinational corporations in our sample often supplement statutory benefits with additional provisions, such as extra parental leave days for both parents, financial support for newborns, or extra care days for family members. A few companies have attempted more ambitious initiatives. One HR manager described how their organization once considered opening an on-site kindergarten for employees' children, but "had to give up the idea because of the costs and lack of expertise" (RO_Int09). More commonly, flexible working hours and remote work serve as the main facilitators of everyday care balance. These arrangements, highly appreciated by women, enable the alignment of professional and parental roles: "And then comes a break in service of one or two years, then come the kids with fevers, and a bunch of other things follow..." (RO_Int07).

Flexibility can be either formally institutionalized, originating from headquarters-level policies, or informally negotiated at the team level, depending on the organization's culture and the manager's sensitivity to work-life balance. Some multinational companies extend inclusivity further by hosting support groups or discussion events on parenthood and family care, enhancing employees' sense of belonging. Public sector organizations (e.g., RO_Int15) offer predictability and job security that facilitate women's continued employment, though often at the expense of lower pay than in the private sector.

Multinational employers stand out for embedding comprehensive well-being policies addressing physical and mental health. These may include provisions for pregnancy loss, menopause support, or general well-being programs combining medical subscriptions and mental health resources. Flexible arrangements, such as work-from-home options and adjusted schedules, help employees manage chronic conditions while maintaining professional continuity. As one HR manager explained: "Paternity leave... longer than what the state provides... policy regarding pregnancy loss... additional fully paid leave." (RO_Int01).

Although these initiatives are not explicitly framed as disability accommodations, they create enabling environments that indirectly benefit workers with health limitations or disabilities by normalizing flexibility and empathy as organizational values.

Company policies toward older workers reveal a dual dynamic of opportunity and constraint. On the one hand, mentoring and career development programs are offered as age-neutral tools to encourage knowledge transfer and professional continuity. Larger corporations, in particular, tend to maintain formal retraining and mentoring schemes, whereas smaller firms rather rely on informal peer learning. On the other hand, interviewees admitted that age-specific measures are often avoided due to concerns about discrimination. During the interviews, the idea of targeting specific age intervals or having policies focused on ageing individuals was seen as potentially posing an ageist risk, which would fall under employee discrimination. However, efforts to secure diversity included discussion about a fair distribution of age-diverse employees in how teams were established.

Nevertheless, employers consistently value seniority and experience as assets, especially where immediate productivity is prioritized: “We hire senior people, so we tend to hire those over 45 rather than younger (...), it is simply seniority. We needed people to become productive very quickly, so they didn’t pay much attention to juniors. They didn’t invest, they didn’t invest in training them.” (RO_Int10).

Formal accommodation policies for persons with disabilities remain rare, and support is typically episodic or informal. Nonetheless, a few large organizations demonstrate awareness and engagement through collaborations with NGOs or by integrating family-friendly flexibility that indirectly benefits employees with disabilities or chronic health conditions. Mechanisms such as onboarding assistance, buddying systems, and executive access contribute to smoother adaptation and belonging.

An inclusive organizational culture, characterized by employee resource groups, diversity training, and family-forward policies, serves as a cross-cutting facilitator. These initiatives not only enhance overall employee well-being but also strengthen retention among vulnerable groups by reducing stigma and normalizing flexibility.

While multinational companies put in practice measures supporting families and work-life balance beyond mandatory legislation, in local and small companies the complementary benefits lack completely as they are not supported by an organizational culture attentive to those topics. A similar situation can be found in relation to health. Small companies generally lack formal policies for mental health accommodation but rely on informal, personalized approaches that emphasize a person-centred ethos. This informal support, however, may blur the boundary between genuine accommodation and implicit pressure to conform, as organizational accountability is limited.

Regarding aging, there remain structural and strategic gaps hindering full integration of older workers. Barriers include a lack of specific age-diversity targets or policies, management challenges in adapting leadership to generational differences, and the complex balancing act required in fostering inclusion across both cultural and generational lines.

Human resources specialists and managers often lack specific diversity training “There is a certain lack of education and information ... about diversity and inclusion” (RO_Int 11). This is reflected in the absence of formal accommodation policies for people with disabilities, resulting in support measures that are mainly ad hoc and seldom systematically integrated into onboarding or organizational inclusion processes. Thus, although some companies introduce targeted measures like retraining, task reassignment, or facilitating hybrid work, the absence of a coherent strategy and dedicated educational framework perpetuates the gap between national-level policies and actual retention practices.

Taken together, these patterns reveal that Romanian organizations remain reactive rather than proactive in addressing inclusion. Without formal training, clear strategic goals, or systematic accountability, diversity efforts risk becoming symbolic gestures rather than transformative practices.

Exit

In the exit phase, Romanian companies operate within a legal and organizational framework that offers varying degrees of protection and support to employees facing career transitions due to care responsibilities, health crises, or ageing. Legally, the dismissal of employees on childcare leave is strictly prohibited, safeguarding parents, especially mothers, during periods of family care. Beyond legal compliance, large multinational corporations often implement additional family-supportive measures to prevent forced resignations linked to caregiving duties.

When it comes to health-related exits, company responses reveal a mix of empathy and pragmatism. One small-company manager described the challenge of balancing compassion for an employee facing anxiety attacks with the operational realities of a small business: “If you think you can recover, we accept you with the greatest love... If not, we can’t do it. It’s basically like I give you your wage for nothing.” (RO_Int14). Romania’s evolving policy environment, characterized by emerging labour protections and growing multinational influences, shapes these organizational practices. However, smaller enterprises often operate in a context of limited regulation enforcement and cultural reluctance to formalize health accommodations, reinforcing the importance of informal practices and reflecting higher economic pressures.

The exit phase exposes contradictions between economic necessities, subjective readiness for retirement, and cultural perceptions of age in the workplace. While many regard retirement as a natural career endpoint, some individuals, especially those valued for mental acuity and expertise, continue contributing past retirement age. This is sometimes met with ambivalent or even ageist attitudes, with informal nicknames undermining older workers’ status, as one interviewee shared: "I know there was some joking about a project manager being called 'the grandfather'." (Int11).

The effectiveness of company-level exit policies varies according to firm size and resource availability. Larger corporations tend to apply structured transition frameworks, including retraining, upskilling, or advisory support for employees nearing retirement. These initiatives acknowledge older workers as valuable knowledge holders and aim to prolong active engagement through continuous learning. Smaller firms, by contrast, often lack the institutional capacity to formalize such measures, resulting in uneven support during the final stages of employment. Smaller companies often lack formal policies specifically targeted at older employees. Instead, older workers in such environments frequently occupy informal mentoring roles, where they transfer knowledge and expertise to younger colleagues. While this role underscores the enduring value of the older workforce, it also highlights a less systematic approach to managing aging employees. The absence of formal policies can mean fewer resources are allocated for upskilling or gradual transitions, potentially leading to an abrupt exit from the workforce or underutilization of senior employees’ capabilities.

Therefore, company-level policies on retirement are uneven; large firms tend to offer retraining and gradual transitions, whereas smaller companies lack formal supports for phased exits. Economic pressures compel some older workers to postpone retirement despite legal frameworks.

Regarding PwD, Romania demonstrates insufficient formalized processes supporting return-to-work post-leave, with continuity in retention undermined by lack of infrastructure and accommodation procedures. Employers note a lack of societal accessibility that further compounds exit challenges for PwD and absence of formal workload distribution practices.

In conclusion, across all three employment phases, recruitment, establishment, and exit, the Romanian data depict a dual landscape of inclusion, shaped by the difference between large multinational corporations (MNCs) and small to medium-sized enterprises. Facilitators of inclusion are most visible within large and internationally connected companies, where corporate standards, transnational HR practices, and external accountability pressures have generated measures supporting gender balance, work–life reconciliation, and employee well-being. In contrast, smaller firms operate with limited resources and without formalized inclusion frameworks. Their responses to diversity are often reactive and personalized, relying on managerial strategies rather than institutionalized policy.

Romanian data highlight a pattern of conditional inclusion, contingent on sectoral resources, organizational size, and managerial attitudes rather than grounded in systemic institutional support.

While Romanian employers have made progress in embedding inclusive values within corporate frameworks, these remain concentrated at the top of the organizational hierarchy and within globalized firms. The limited policy enforcement, and uneven access to formal HR capacities sustains a model of inclusion that is selective, fragmented, and culturally constrained, rather than systemic.

7. Insights across four policy contexts

National policy contexts and organisational practices interact to shape inclusion across the career cycle. Our data show both common mechanisms and context-specific differences.

1. Flexibility as a core enabler of inclusion

Across all four countries, flexibility emerges as the most salient facilitator of participation for employees with care responsibilities, health conditions or later-life transitions. However, its meaning and institutionalisation significantly differ between contexts.

In Norway, flexibility is embedded in organisational culture and supported by institutional norms that regard caregiving and health adjustments as legitimate and routine. Managers describe flexible scheduling, meeting-free periods and hybrid work as common as the Norwegian evidence points to normalisation of flexibility rather than its negotiation, reflecting both generous welfare provisions and the existence of trust between employer and employee. In Germany, flexibility is widespread but more managerially mediated. Formal rules allow for flexible time arrangements and extended parental leave, yet decisions about day-to-day adjustments often depend on the approach of individual supervisors. The German model seems to rest on regulated choice: the framework exists, but implementation can rely on managerial interpretation, reflecting thus a tension between the legal regulations and practical enactment. Polish and Romanian employers also recognise flexibility as essential, particularly in large organisations with structured HR systems. However, the legal emphasis on neutrality, especially prohibiting questions about family or care status at recruitment, creates a paradox: flexibility cannot easily be discussed at the entry stage, even when desired by candidates. Although legislation regarding discrimination is implemented in all countries, the issue emerges only in Romania and Poland, highlighting the rather recent history of practical experience with this type of equality frameworks. This limits proactive matching between organisational needs and employee circumstances. Once hired, flexibility is often accessible, but it remains reactive. In Romania, flexible arrangements and well-being initiatives appear most developed in multinational corporations, which draw on global inclusion models. Public-sector organisations offer predictable schedules but few additional supports. Romanian data therefore depict a rather segmented flexibility, concentrated among larger employers with international exposure.

Overall, these patterns confirm that flexibility functions as a shared facilitator but with distinct operational implementations: Norway integrates flexibility into the social contract; Germany implements it within the dispositions of legal regulations; Poland treats it as individual accommodation; and Romania's adoption is organisation-specific.

Flexibility is a key day-to-day facilitator for carers, workers with health conditions, and older workers in all four countries. However, its implementation varies by manager, role, and firm size. Policy can protect equity by combining rights-based flexibility, (establishing minimum legal entitlements that allow employees to adjust working hours, locations, or schedules) with predictability standards, introducing clear rules that prevent flexibility from turning into unpredictability or insecurity. Policies that aim to promote equitable access to flexible work should guarantee a right to request flexibility

and also ensure that this flexibility is predictable and manageable for both workers and employers to the extent that it becomes a stable organisational practice.

2. Disability hiring: between regulation and practice

The data highlight a consistent gap between formal disability policy frameworks and organisational practice. Each country maintains legal or policy provisions, yet the interviews show divergent ways in which these translate, or fail to translate, into recruitment decisions.

In Germany, the statutory 5% quota for employees with disabilities provides a structural incentive and ensures involvement of workplace disability representatives. Some employers integrate external counselling or job-adaptation processes. Poland presents a similar dynamic: a 6% quota and financial incentives from the PFRON fund exist, but employers report administrative complexity and a narrow understanding of disability. Large companies are more likely to train managers and develop tailored procedures, whereas small firms tend to rely on ad hoc solutions. Here, the challenge can be bureaucratic overload or limited awareness of what effective accommodation entails. In Romania, anti-discrimination legislation and a national quota framework also exist, yet many firms either pay the penalty rather than employ workers with disabilities or establish partnerships with sheltered units to meet formal requirements. Infrastructure barriers, from transport to office accessibility, constrain meaningful inclusion. Disability hiring is thus marked by compliance without full integration. By contrast, in Norway employers report fulfilling legal obligations but rarely pursuing targeted recruitment strategies. Adjustments and health supports are well developed after hiring. This reflects a broader emphasis on universal welfare measures over targeted interventions.

In Poland and Romania there is a limited proactive recruitment of people with disabilities. Legislative strength alone does not guarantee organisational commitment; implementation depends on managerial beliefs, administrative capacity and the perceived legitimacy of targeted measures.

To close the gap between formal disability rules and real hiring, policies should redirect effort from compliance paperwork to implementation capability. In this sense, it should be easier for employers, particularly small and medium-sized enterprises, to access disability employment supports, for example by creating a single, user-friendly entry point that brings together existing incentives, subsidies, and accommodation services. Information on accessibility providers could further enhance the process, allowing employers to quickly identify sources for assistive technologies, workplace adjustments, or specialised training. In parallel, support is needed to help organisations upgrade both their physical infrastructure (e.g. ramps, restrooms, signage) and their digital systems, such as websites, recruitment platforms, and HR software, to meet accessibility standards. Simplifying and centralising support in this way would lower administrative barriers and enable smaller employers to better act on inclusive hiring commitments.

3. Age and intergenerational issues

Approaches to age diversity further illustrate national contrasts in how inclusion is conceptualised. In Norway, employers explicitly view age balance as a resource. Organisations plan for generational renewal and knowledge transfer, and flexible retirement schemes allow employees to continue working beyond statutory pension age. Age is treated as a dimension of diversity with strategic value, consistent with the Norwegian emphasis on lifelong participation. In Germany, evolving approaches to workforce development reflect a variety of perspectives. Employers may seek to balance generational renewal with the retention of experienced staff, sometimes highlighting younger employees' familiarity with emerging technologies. At the same time, some organizations invest in mechanisation or ergonomic innovations to support longer careers for older workers. While efforts

toward legal equality exist, broader societal ideas about adaptability and age can still influence recruitment practices in subtle ways, leading to complex dynamics regarding age and opportunity in the workplace. Polish organisations emphasise formal competence frameworks and structured assessments. While these appear age-neutral, they can indirectly disadvantage older applicants whose qualifications were obtained under different systems. Within firms, mentoring and peer learning programmes exist mainly in larger organisations. In Romania, some sectors, particularly where rapid productivity is valued, actually prefer candidates above 45, perceiving them as more stable and experienced, yet explicit age-diversity policies are rare. Mentoring and re-skilling initiatives exist largely in large companies, while smaller firms depend on interpersonal goodwill. Age management is therefore fragmented and pragmatic rather than strategic. Comparatively, Norway stands out for institutionalising intergenerational balance and Poland and Romania for size-based variations. The evidence cautions against treating “age inclusion” as a universal category: it is locally defined through productivity expectations, labour-supply dynamics and welfare configurations.

To implement age-diversity practice, policies should promote age-neutral recruitment, support the retention of older workers through continuous skill investment, and institutionalise knowledge transfer mechanisms (e.g. reverse mentoring). Implementing health strategies at organisational level can prevent early exits, while funding ergonomic improvements is crucial for sustaining employability in physically demanding roles. Monitoring the newly issued skill credentials and the retention of employees aged 50+ can help track progress. Since advantages tend to cluster in large firms, smaller companies have access to tested tools, expert advice, and targeted financial support, reducing the complexity of adopting age-inclusive and intergenerational practices. Finally, introducing late-career flexibility (e.g. phased retirement) can combine gradual workload reduction with targeted training and, where necessary, transport or health supports to enable longer, healthier working lives.

4. Care responsibility accommodation across the career cycle

The treatment of employees with caring responsibilities reveals how family and labour policies intertwine with organisational norms. Norwegian employers routinely integrate care considerations into both recruitment and daily operations. Parental leave and flexible work are assumed rights, and managers regard caregiving as part of normal life rather than an exception. Inclusion therefore rests on normalisation supported by policy infrastructure. German organisations also accommodate carers, but the accounts suggest ongoing negotiation between policy and practice. Flexible scheduling and long parental leaves are possible, while HR departments mitigate the implementation of legal provisions. In Poland, the legal prohibition on asking about family status protects against discrimination but simultaneously restricts open discussion of needs. Employers may wish to support carers but lack the conversational space to do so before hiring. Some of the larger organisations compensate through standardised leave and part-time options, while smaller firms tend to rely on interpersonal understanding. Romanian interviews reveal a difference between large and small employers. Multinational companies seem to invest more in family friendly benefits and communication campaigns, while small companies struggle to implement similar measures. A few attempts at on-site childcare were discontinued due to cost or administrative complexity. The public sector offers job security but little adaptability. The pattern here reflects dualisation between globally connected and resource-constrained segments of the labour market.

These findings show that all countries recognise the legitimacy of care, while Norway achieves systemic integration of care into employment relations. Results suggest that normalisation requires both structural support and agency at the organisational level; without the latter, measures remain procedural.

To make care inclusion more than a procedural compliance issue, policies should combine universal rights with practical support that helps employers act on them. This can involve manager training, predictable flexibility standards, and safe post-hire disclosure processes that allow care needs to be addressed without breaching privacy. Targeted support for smaller companies such as small grants or tax incentives could help them pilot family-friendly measures like childcare partnerships or flexible shift arrangements and can reduce the implementation gap between large and small firms. Linking monitoring to practice outcomes (flexibility access, return-to-work rates) rather than only legal entitlements would help turn care inclusion into an embedded organisational norm.

To conclude, the data show divergent patterns of inclusion at organisational level. First, inclusion is strongest where universalistic welfare principles align with organisational norms, as in Norway. Second, regulatory frameworks alone are insufficient: Germany, Poland and Romania all illustrate how legal obligations can coexist with selective or symbolic implementation. Third, organisation size and transnational exposure significantly mediate practice in the newer EU member states, Poland and Romania, suggesting that diffusion of global HR standards can sometimes substitute a weaker national enforcement. Our country cases seem to suggest that inclusion operates through context-specific compromises between policy design, organisational capacity and cultural adaptations.

Limitations

This study provides valuable insights based on qualitative interviews conducted across four countries reflecting institutional contexts. Although the interviews yielded rich, in-depth data, several limitations inherent to this methodological approach must be acknowledged, as they affect the generalizability and interpretation of the findings.

This study offers nuanced insights into how inclusion practices unfold across four distinct institutional contexts, yet several methodological and interpretive limitations should be acknowledged. As a qualitative inquiry, the findings are not intended to provide generalizable conclusions but rather to highlight patterns of organisational practices as revealed by employers within specific organizational and national settings.

First, although a standardized interview guide ensured thematic consistency across countries and career phases, sampling strategies varied according to national research infrastructures and access channels. This variation produced contextually rich but uneven samples, reflecting diverse organizational types rather than statistically representative employer populations. Second, data collection and analysis took place in multiple languages, which introduces potential interpretation biases from researchers working with data from other countries. To mitigate this, a cross-team interpretative process was implemented, involving researchers who conducted interviews and are fluent in the original languages to enhance the accuracy and cultural sensitivity of data interpretation. Finally, as the study is shaped by the distinct socio-cultural, economic, and organizational conditions of each national setting, the findings should be understood as illustrative of how inclusion mechanisms are embedded in local institutional contexts.

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Annex

Table 1. Short Overview of interview participants in each country

| Country | Sector | | | Firm size | | | Gender of the informant | | Position of the informant | | | Location of the company | |
|---------|--------|---------|-------|-----------|--------|-------|-------------------------|--------|---------------------------|---------------|--------------------|-------------------------|-------|
| | Public | Private | Mixed | Small | Medium | Large | Male | Female | Manager or company owner | HR specialist | External recruiter | Urban | Rural |
| Germany | 1 | 14 | 0 | 8 | 2 | 5 | 14 | 6 | 14 | 5 | 1 | 14 | 1 |
| Norway | 6 | 8 | 1 | 1 | 0 | 12 | 5 | 10 | 10 | 5 | 0 | 15 | |
| Poland | 4 | 11 | 0 | 5 | 1 | 9 | 8 | 7 | 6 | 5 | 4 | 15 | |
| Romania | 1 | 14 | 0 | 4 | 1 | 10 | 5 | 10 | 4 | 12 | 0 | 15 | |

Table 2: Extended Overview of Interview Participants In Each Country

| Interview no | Sector (private, public) | Firm size (number of employees) | Industry | Position(s) they recruited for (ICT, accountant, office worker etc.) | Gender of the informant(s) | Function: HR, line manager, CEO etc. | Geographical location of the Company (where the Position is filled; metropolitan area, urban, small-town, rural) |
|-----------------------|--------------------------|---------------------------------|-----------------|--|----------------------------|---|--|
| Germany (west) | | | | | | | |
| DE_Int01 | private | 34,000 | Logistics | office worker & logistics staff | female | HR Specialist Recruiting | metropolitan area |
| DE_Int02 | private | 500 | Craft business | office worker & craftworker | male & male | Company owner & Head of Marketing | small-town |
| DE_Int03 | private | 20 | IT | IT specialist | male & male | Company owner & IT specialist | small-town |
| DE_Int04 | private | 20 | Insurance | office worker, actuary & IT specialist | male & male | Board member & IT specialist with refugee background | urban |
| DE_Int05 | private | 106 | IT | project manager, IT developer & office worker | female | HR, Office management, Marketing management & Environmental officer | urban |
| DE_Int06 | private | 38 | Retail | retail worker | male & male | Company owner & Store manager | small-town (near the eastern border) |
| DE_Int07 | private | 30 | Tax consultancy | Tax consultant & Tax assistant | male | Tax partner | urban |
| DE_Int08 | private | 34,000 | Logistics | office worker & logistics staff | male | Team leader recruiting and onboarding logistics operatives | small-town |
| DE_Int09 | private | 12 | Tax consultancy | Tax consultant & Tax assistant | female | Company owner | urban |

| | | | | | | | |
|----------------|----------------|-------------------------|----------------------------|---|---------------|--|-------------------|
| DE_Int10 | private | 40 | Manufacturing & Production | office worker, technician & mechanic | male | Company owner | rural |
| DE_Int11 | public | 1,300 | Public administration | office worker & administrative worker | male & female | Head of HR and internal service & Deputy of HR | urban |
| DE_Int12 | private | 139,000 | Manufacturing & Production | office worker & sales representative | female | External Recruiting & Sourcing | metropolitan area |
| DE_Int13 | private | 32 | Retail | retail worker | male | Company owner | metropolitan area |
| DE_Int14 | private | 131 | Wholesale Trade | Apprentice in Wholesale & foreign trade management/ Apprentice in Warehouse logistics | female | Head of HR | small-town |
| DE_Int15 | private | 18 | Online retailer | office worker & sales representative | male | Company owner | metropolitan area |
| Norway | | | | | | | |
| NO_Int01 | private | | Headhunter | Data and AI specialist | male | HR | metropolitan area |
| NO_Int02 | private | 758 | ICT | Senior Data Engineer | female | HR | metropolitan area |
| NO_Int03 | private | 800+ | ICT | Managing BI Consultant | male | line manager | metropolitan area |
| NO_Int04 | private | | Headhunter | Advisor/Accountant | female | HR | metropolitan area |
| NO_Int05 | public | 50000 | Public administration | Communication adviser | female | line manager | metropolitan area |
| NO_Int06 | public | 430 | Public administration | Data scientist | male | line manager | metropolitan area |
| NO_Int07 | public | 6500 | Public administration | Office worker | female | line manager | urban |
| NO_Int08 | public | 22000 | Public administration | Consultant (accounting) | female | line manager | metropolitan area |
| NO_Int09 | private | 7600 | Accounting | Senior adviser (accounting) | female | line manager | metropolitan area |
| NO_Int10 | public | 2700 | Transportation | Wage consultant (accountant) | female | line manager | small town |
| NO_Int11 | private | 3000 | Communication | Sales | female | HR | metropolitan area |
| NO_Int12 | public | 320 | Public agency | Senior consultant | male | line manager | metropolitan area |
| NO_Int13 | private | 22 | Construction | Sales | female | line manager | metropolitan area |
| NO_Int14 | private/public | 900 | Energy | Office worker | female | line manager | metropolitan area |
| NO_Int15 | private | 5000 (inn 5 countries) | Insurance | Customer consultant | male | HR/line manager | urban |
| Romania | | | | | | | |
| RO_Int01 | Private | 300 in RO (Corporation) | Food | All positions | female | Talent Acquisition Team Leader | Urban |

| | | | | | | | |
|---------------|---------|--|--|---------------------------|--------|--|------------|
| RO_Int02 | Private | 22 | Finance | All positions | female | HR director | Urban |
| RO_Int03 | Private | 2300 in RO | Beverage | Sales worker | male | Senior Talent Acquisition Partner | Urban |
| RO_Int04 | Private | 10 (plus 200 collaborators) | Training and language services for companies | Trainers | male | HR recruitment specialist | Urban |
| RO_Int05 | Private | 485 | Metal manufacturing | Factory workers | female | HR specialist | Small Town |
| RO_Int06 | Private | 870 in RO | Beverage | All positions | female | HR director | Urban |
| RO_Int07 | Private | 1200 in RO | Software | ICT | female | Senior Talent Acquisition Manager | Urban |
| RO_Int08 | Private | over 1000(Globally, aprox 350-500 Romania) | Accounting | Secretary, accountant | female | Training Manager | Urban |
| RO_Int09 | Private | over 1000 (Romania) | Tire manufacturing | receptionist, | female | Recruitment Team Leader | Urban |
| RO_Int10 | Private | over 1000 (Romania 4400) | Gaming | ICT | female | Human Resources Manager and Learning & Development | Urban |
| RO_Int11 | Private | 11 | Software | ITC | male | Partner & Technical Director | Urban |
| RO_Int12 | Private | 10 | Finance | ITC | female | Talent Partner | Urban |
| RO_Int13 | Private | 11 | car service | Workers | male | Manager | Urban |
| RO_Int14 | Private | 300 | Events | All positions | male | Manager | Urban |
| RO_Int15 | Public | 4500 | Education | All positions | female | Head of HR Service | Urban |
| Poland | | | | | | | |
| PL_Int01 | public | 1000 | technology/entertainment | all positions, mostly ICT | female | HR manager and diversity manager | urban |
| PL_Int02 | private | 10000+ | Consulting | ICT accountants | male | HR | urban |
| PL_Int03 | private | 13 | Accounting | | male | co-owner of the company | urban |
| PL_Int04 | private | 40 in PL, 300 worldwide | IT | ICT | male | recruitment | urban |

| | | | | | | | |
|----------|--------------|------------------------------------|--------------------------------|--|--------|---|-------------------|
| PL_Int05 | private | 4000 | Logistics&Automotive | all positions | female | HR business partner | metropolitan area |
| PL_Int06 | NGO | 150 permanent (100 cooperating) | Social Support | office workers, vocational counsellors office workers all positions | female | HR manager | urban |
| PL_Int07 | public | 270 | Public Administration | | male | director | urban |
| PL_Int08 | private, NGO | 11 | Social Support | | female | HR | urban |
| PL_Int09 | private | 10 | recruitment company | | female | headhunter N/A | urban |
| PL_Int10 | private | 40 | recruitment company | accounting and finance | male | headhunter N/A | urban |
| PL_Int11 | private | 15k+ worldwide, 1700 in PL | Market Research | all positions in the company, ICT specialists and analysts in the interviewees' team | male | director | urban |
| PL_Int12 | private | >100 | Recruitment | logistics, production specialists, engineers, sales specialists | female | senior recruitment business partner (senior specialist) | urban |
| PL_Int13 | | 500 | public administration | office workers | male | mid-level manager | urban |
| PL_Int14 | public | 800 | public administration | office workers | male | deputy director | urban |
| PL_Int15 | private | 400 | marketing, telecomunicarion | office workers, graphic designers, advertising experts | female | director | urban |



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