

TRAINDRVR2EU WP2A2 DELIVERABLE:

IDENTIFYING GAPS IN EXISTING TRAINING PROGRAMS

TO BE REMOVED WHEN DELIVERABLE IS VALIDATED

REQUIREMENTS FROM THE APPLICATION FORM DELIVERABLE 2: GAPS ANALYSIS

Analyze gaps in existing training programs across partner countries to address inconsistencies in qualification recognition and compliance with EU safety standards. Identification of key gaps and challenges in existing training programs across partner countries, allowing for the harmonization of content and methodologies to create a consistent and effective training approach across Europe.

"Identifying Gaps in Existing Training Programs" analyzes inconsistencies in training methodologies and qualification recognition across EU Member States. By reviewing curricula, comparing national approaches, and benchmarking best practices, a gap analysis report outlines disparities in training content and pedagogical strategies, providing a roadmap for standardization

Next, an analysis of existing training programs across EU countries identifies inconsistencies in qualification recognition, compliance with regulations, and teaching methodologies. By benchmarking best practices, this phase establishes a clear roadmap for harmonizing training content and ensuring consistency across partner countries.

The gap analysis evaluates inconsistencies in existing training programs, offering clear recommendations for standardization and regulatory alignment.

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Context and Objective

Building on the six national reports (Czechia, Finland, France, Ireland, Romania, Switzerland) and the Comprehensive Needs Assessment (Deliverable 1), this report analyzes gaps in existing training programs for non-EU professional drivers, drawing on situations, evidence and examples explicitly documented in the national reports, with regard to:

- qualification recognition and access pathways,
- compliance with EU road-safety and social-legislation standards,
- training methodologies and pedagogical practices,
- consistency, transferability and institutional coherence across partner countries.

In line with TRAINDRVR2EU project, this analysis benchmarks best practices, identifies key gaps and challenges and illustrates them through concrete national situations documented in the country reports. It provides example-based recommendations establishing a clear roadmap for harmonizing training content and methodologies within the project framework.

Methodological Approach

The gap analysis is based on the:

- benchmark of best practices identified by training providers, employers and stakeholders and reported within the surveys and interviews conducted for WP2A1 deliverable “comprehensive needs assessment for trainers and non-EU drivers”;
- systematic review of national professional driving curricula and regulatory frameworks;
- comparison of access and qualification-recognition procedures for non-EU drivers;
- qualitative analysis of reported trainer and trainee experiences documented in the national reports produced for WP2A1 deliverable “comprehensive needs assessment for trainers and non-EU drivers”;
- focus groups reports from the participating countries and that took place in May 2026.

The analysis focuses on documented situations to highlight discrepancies between formal systems and training realities.

1. Benchmark of best practices

The surveys, interviews conducted within activity 1 and the national focus groups conducted for this activity raised the opportunity to collect best practices. This benchmark is meant to be a source of inspiration for the training framework of TRAINDRVR2EU. The following part presents 8 best practices:

- a) Early skills assessment and pre-selection,
- b) Job specific language training embedded in vocational pathways,
- c) Formal preparation and upskilling of trainers,
- d) Adaptation to non-EU trainees and use of simplified, visual and multilingual training materials,
- e) Integrated social and administrative support,
- f) Pre-qualification pathways (bridging programs before access to full qualification),
- g) Gradual, flexible regulatory pathways (where legally possible),
- h) Structured employer led integration (mentoring, induction, follow up).

For each practice, evidence from the participating countries in the project is given.

a. Early skills assessment and pre-selection

Practice shows that **prior assessment prevents costly failures and aligns training effort with real needs**. However, this assessment serves different purposes depending on the stage (before training entry vs before recruitment), and should not be treated as a single, uniform process.

The practice: implement structured pre-entry assessment mechanisms adapted to the stage of the pathway.

Two complementary types of assessment should be distinguished: pre-training assessment and pre-recruitment assessment. These two assessments are complementary but not interchangeable. The pre-training assessment supports inclusion and training success. The pre-recruitment assessment supports employability and job performance.

Confusion between them may lead to the exclusion of candidates too early or insufficient preparation before employment.

i. Pre-training assessment (before entry into regular professional driving program)

This assessment aims to adapt training pathways and identify learning needs. It should focus on:

- identifying existing competencies and gaps,
- distinguishing language barriers from technical skills,
- orienting candidates towards appropriate or preparatory pathways (e.g. pre-qualification, bridging modules).

It typically covers:

- driving fundamentals (if applicable),
- basic regulatory awareness,
- learning capacity and language baseline.

Objective: ensure that training is accessible, adapted, and leads to successful completion.

ii. Pre-recruitment assessment (before hiring by employers)

This assessment aims to evaluate operational readiness for employment. It is generally more selective, directly linked to job requirements and productivity, and used to decide on recruitment and define any necessary complementary training. It may include:

- practical driving tests in real or simulated conditions,
- job-specific scenarios (delivery, time constraints, safety compliance),
- behavioural and reliability aspects.

Objective: reduce hiring risks and support efficient integration into the workplace.

Evidence across countries :

- Czechia: Employers report the absence of a structured system to assess practical driving competence before recruitment, leading to mismatches. At training entry stage, assessment remains limited and not harmonized.
- Finland: Training centers emphasize early identification of learning gaps (language, learning capacity) to support successful training pathways, rather than pre-selecting on technical driving skills.
- France: Pre-entry evaluation focuses on training readiness (language, cognitive skills, professional project) rather than driving ability, which is acquired during professional training. Workplace immersion periods are widely used to validate career choice in real conditions.
- Ireland: Employers highlight the need to identify candidates' potential and capacity to complete the pathway, given long and sequential access to the profession, linking both training entry and recruitment considerations.
- Romania: Informal pre-screening by recruitment agencies combines basic skill checks and employability criteria but remains outside formal training systems and may mix training and recruitment objectives.
- Switzerland: Due to high entry costs and limited access, employers rely on pre-selection focused on employability and immediate readiness, rather than structured pre-training assessment.

b. Job-specific language training embedded in vocational pathways

Practice shows that **language should become a tool** for work, not a barrier to entry. **The practice: Integrate profession-oriented language training directly into driver qualification pathways, rather than offering language courses in isolation.**

Focus on:

- Technical vocabulary,
- safety procedures,
- tachograph and regulatory vocabulary,
- interaction with enforcement authorities,
- workplace communication.

Evidence across countries

- Czechia: Training can be delivered in foreign languages or with translators, enabling immediate access to vocational content but employers and trainers stress the need for Czech language linked to safety, regulations and workplace communication, not general language learning.
- Finland: VET-based language support linked to professional training improves completion and retention when language learning is contextualized.
- France: Employer-linked programs show higher success when French is taught for specific work situations.
- Ireland: English proficiency directly affects theory test success, regulatory understanding and workplace safety, showing that language must be linked to operational tasks (rules, tachograph, communication) rather than taught in isolation.
- Romania: Employers who provide pre-arrival or early workplace language preparation report smoother onboarding.
- Switzerland and Ireland: Even in a restrictive system, employers highlight language mastery as the decisive factor when permits are granted.

c. Formal preparation and upskilling of trainers

Practice shows that **trainer capacity directly affects training completion and safety outcomes.**

The practice: train the trainers to train non-EU trainees

Provide trainers with specific preparation for teaching migrant trainees or drivers:

- adult second-language pedagogy,
- simplified technical instruction,
- intercultural communication,
- trauma-aware and inclusive teaching methods.

Evidence across countries

- Czechia, France, Ireland and Romania: Trainers explicitly report a lack of standardized methodologies and no specific preparation for teaching non-EU trainees and strongly demand it.
- Finland: Trainers cope better due to institutional stability but still lack specialized tools.
- Ireland: Training providers report they are not equipped to support non-EU drivers, particularly regarding language, interpretation and adapted teaching, and face limited trainer capacity and shortages.
- Switzerland: Low exposure to non-EU trainees limits pedagogical adaptation.

d. Adaptation to non-EU trainees and use of simplified, visual and multilingual training materials

Practice shows **such materials increase comprehension without diluting regulatory requirements.**

The practice: give tools to better train the non-EU trainees

Adapt training content using:

- visual support,
- diagrams,
- real-life scenarios,
- multilingual glossaries of technical terms.

Evidence across countries

- Czechia: Training is adapted through slower pace, focus on basics and tailored explanations, especially for non-EU learners but trainers highlight a lack of suitable multimedia and teaching tools, reinforcing the need for visual and simplified materials
- France: Trainers identify visual and contextualized materials as critical for training success of people not fluent in French.
- Romania: Informal agency training fills this gap where formal materials are not adapted.
- Finland: Language-aware teaching improves accessibility without lowering standards.
- Ireland: Language and comprehension barriers, combined with limited time and capacity highlight the need for adapted and simplified training materials.
- Switzerland: Identical content for all works only when comprehension is ensured.

e. Integrated social and administrative support

Practice shows that **stability outside work conditions stability at work.**

The practice: identify resources to guarantee social and administrative support and bring awareness to the ones in contact with non-EU trainees and non-EU drivers

Combine professional integration with basic social support, including:

- housing,
- mobility,
- administrative guidance,
- explanation of legal status and rights.

Evidence across countries

- Czechia: Integration support is partly provided through NGOs and integration centres (language, employment, housing support) and is not work oriented.
- France: Integration relies on complementary mechanisms combining basic public integration services and programs such as HOPE, which provide work-oriented language training, vocational preparation, and stabilizing social support, helping secure training and employment pathways.
- Finland: Public employment and integration services reduce early drop-out.
- Romania: Lack of structured support shifts the burden to employers, increasing risks.
- Switzerland: Absence of support increases dependency on informal or indirect labor solutions.
- Ireland: Non-EU drivers face fragmented systems (licensing, immigration, permits), high training costs and dependence on employer sponsorship, creating instability that affects both training access and retention.

f. Pre-qualification pathways (bridging programs before access to full qualification)

Practice shows **that targeted preparatory pathways significantly increase access, completion, and employment outcomes for vulnerable or distant-from-employment groups.**

The practice: implement publicly funded pre-qualification programs enabling candidates to prepare for entry into vocational training pathways.

These programs allow candidates to:

- build foundational skills (language, numeracy, learning capacity),
- acquire first professional references and sector knowledge,
- understand expectations of training and employment,
- reduce dropout risks before entering full qualification.

They typically include:

- skills upgrading modules (language, basic education, learning-to-learn),
- orientation to the transport and logistics sector,
- initial professional immersion or simulation,
- preparation for entry requirements of formal training programmes.

Evidence (France):

Pre-qualification schemes funded by public authorities (Regions, France Travail) constitute a structural component of the French training system, especially for vulnerable groups and people far from employment.

These schemes finance remedial training and preparatory modules prior to entering a full qualification pathway (e.g. professional driver certification).

g. Gradual, flexible regulatory pathways (where legally possible)

Practice shows that **flexibility in sequencing administrative steps, training and employment can facilitate access** to the profession without lowering safety standards.

The practice: where legally possible, organize pathways in a way that avoids long inactive periods and allows candidates to progress step by step.

This may include:

- better coordination of administrative steps,
- reduced waiting times between procedures,
- alignment between training and access to employment.

The objective is not to change regulations, but to **improve how pathways are organised and sequenced in practice**.

Evidence across countries:

- Czechia: Access to the profession is organized in several sequential steps (license procedures, qualification, periodic training), creating long and sometimes rigid pathways.
- France: The pathway is also structured and sequential, with limited regulatory flexibility. Access depends on completing each step (license, training, qualification), although preparatory and integration programs can support progression.
- Finland: Some flexibility exists in how language learning, training and integration measures are combined, helping smoother progression into training.
- Ireland: Access to the profession is highly sequential and lengthy, often taking over a year, with limited flexibility and strong dependence on permits and administrative processes.
- Romania: Administrative procedures are complex and insufficiently coordinated, creating bottlenecks and delays before effective entry into training or employment.
- Switzerland: Limited flexibility in access conditions represents a structural barrier, restricting entry despite existing demand.

h. Structured employer-led integration (mentoring, induction, follow-up)

Practice shows that **integration should continue after certification, where most failures occur.**

The practice: organize specific onboarding for non-EU drivers

Employers act as integration actors, not just recruiters, through:

- assigned mentors or tutors,
- structured induction plans (30–90 days),
- progressive productivity expectations,
- regular integration check-points.

Evidence across countries

- Czechia: Employers note better retention when integration is actively supported and onboarding is gradual.
- France: Employer mentoring combined with language and social support increases retention and reduces early attrition.
- Finland: Close employer–training center coordination facilitates workplace adaptation.
- Romania: Where employers invest in induction, retention is higher despite weak institutional support.
- Switzerland: Integration succeeds mainly when companies provide internal support due to lack of public schemes.
- Ireland: Non-EU recruits often work in other roles while completing licensing and training, requiring employer-led onboarding and increasing the need for structured integration to reach full productivity.

2. Identified Gaps, Illustrated by National Evidence

The surveys, interviews and national focus groups brought enough documentation to observe the gaps between the current training and the actual needs of trainees, trainers and employers. Besides the contextual constraints of the recognition and access pathways in qualification, four types of gaps have been identified:

- in practical compliance with EU safety and social regulations,
- in pedagogical approaches and learning design,
- in trainer preparation and methodological support,
- in cultural integration and social conditions.

Each gap has been identified through reported situations in the participating countries in the project. It is then defined and followed by a recommendation based on best practices reported in the first part of this document and illustrations on how the gap could be covered based on the recommendation.

The topics and sample questions presented in each section are intended solely as illustrative examples of areas that may be considered in the program. They do not represent a final or exhaustive list, as the assessment structure, methodology, and content will be further defined in a subsequent project activity.

a. Contextual Constraints in Qualification Recognition and Access Pathways

Reported Situations

- **Czechia:** Employers report that experience gained outside the EU does not guarantee recognition or suitability, and there is no system to assess real skills beforehand, leading to delays and inefficiencies in accessing the profession.
- **Finland:** Training providers report that experienced drivers from the Philippines or India frequently possess solid driving skills but are unable to enter VET pathways due to insufficient Finnish or Swedish, even when language deficits do not directly affect driving competence.
- **France:** Qualification is strictly standardized and delivered exclusively in French. Employers indicate that potential drivers fail entry or assessments solely due to language-based examination formats.
- **Ireland:** Non-EU professional drivers cannot directly transfer their heavy vehicle qualifications (Categories C/D), even when highly experienced, and must restart the full licensing pathway (theory test, learner permit, training, and driving test). This prevents recognition of prior professional competence and delays entry into employment.
- **Romania:** Non-EU drivers must complete multiple administrative steps (work permit, CPC, license exchange) sequentially, leading to long inactive periods before training can effectively start.
- **Switzerland:** Highly experienced third-country drivers are excluded at entry stage due to quota restrictions and immediate Swiss license requirements, regardless of prior EU-comparable experience.

Structural context

There is currently no structured mechanism across partner countries to assess and consider prior professional driving experience before entry into full certification pathways for non-EU drivers. However, this situation largely reflects existing European regulatory frameworks, which do not provide for the recognition of prior professional experience as a pathway to access the profession of driver.

As a result, prior experience cannot be formally validated in place of mandatory certification, even when drivers have significant professional backgrounds outside the European Union.

Recommendation to improve access pathways through preparatory and pre-qualification measures

Introduce structured pre-training preparation and assessment mechanisms focused on training readiness rather than prior driving competence.

This would enable, for example:

- **a Romanian recruited candidate to enter a pre-qualification pathway while completing administrative processes,**
- **a Finnish training provider to distinguish language and learning needs from technical training requirements,**
- **a Czech employer to better identify candidates' potential to successfully complete training, rather than attempting to assess professional competence beforehand.**

The objective is not to assess or validate driving competence prior to training, since certification remains mandatory under European regulations, and professional training is precisely designed to develop these driving competences.

Instead, these mechanisms should support the identification of language level and learning capacity, the orientation toward appropriate preparatory pathways (pre-qualification), progressive access to training, the improvement of completion rates and the reduction of dropout.

This approach ensures that candidates are better prepared to enter and succeed in training, without questioning existing regulatory requirements or safety standards.

Illustrations

Here are examples of themes that could be included in the pre-training skills assessment:

Functional Language for Driving Context: focus on practical, job-relevant communication, not full language proficiency.

- Understanding basic instructions (spoken or visual-supported) e.g. "Turn left", "Stop here", "Follow the van",
- Recognizing common road-related vocabulary: fuel, documents, delivery, break, hazard...,
- Interpreting simple written information: delivery notes, route sheets, symbols and short text,
- Responding to basic interactions: police, employer, customer (simple exchanges),

- Use of communication aids: GPS voice prompts, translated apps, icons.

Purpose: Identify whether difficulties are due to language barriers or actual misunderstandings of driving/logistics tasks.

Applied Numeracy & Calculation Skills: assess real-world calculation ability in driving/logistics contexts, not academic math.

- Basic operational calculations:
 - Estimating speed vs distance: “If you drive at ~50 km/h, how long for 25 km?”,
 - Simple time management : departure / arrival time estimation,
 - Break scheduling logic
 - Bridge height calculation
- Fuel & consumption awareness :
 - Estimating fuel needs,
 - Understanding dashboard ranges,
 - Comparing fuel efficiency options.
- Vehicule, load & weight awareness
 - size (length, width, turning circle) and the relationship between the vehicle and road / route restrictions that are common in Europe.
 - Basic understanding of: load limits, weight distribution principles, simple addition of cargo weights (approximate is fine),
 - Route & distance interpretation : reading distances on GPS/maps, choosing shortest vs fastest route (conceptual),
 - Simple job-related numeracy (optional) : delivery counts, basic cost/logs understanding (if relevant).

Purpose: Distinguish lack of numeracy skills and misunderstanding of operational driving concepts

Core Vehicle Handling & Control: assess fundamental operational skills independently of context or regulations.

- Starting/stopping smoothly (manual/automatic),
- Clutch control & gear shifting,
- Steering precision and lane positioning,
- Low-speed manoeuvres (tight turns, reversing control),
- Braking techniques (progressive, emergency),
- Basic use of driver assistance systems (e.g. cruise control, lane assistance, braking assistance),

Purpose: Identify baseline vehicle mastery, including familiarity with basic driving assistance features commonly used in European vehicles, regardless of country-specific rules.

Road Awareness & Hazard Perception: evaluate how candidates perceive and react to dynamic environments.

- Hazard identification (pedestrians, cyclists, unpredictable drivers),
- Reaction timing to sudden events,
- Mirror usage and situational scanning,
- Safe following distances,
- Anticipation of risks in urban vs rural settings.

Purpose: Distinguish cognitive driving competence from formal rule knowledge.

Traffic Interaction & Behaviour : Focus on how drivers interact with others on the road.

- Yielding and merging behaviour (without relying on local signage language),
- Communication with other drivers (signals, positioning),
- Roundabouts navigation logic (universal dynamics, not signage-dependent),
- Respect of right-of-way logic through observation.

Purpose: Understand intuitive driving behaviour vs learned national rules.

Navigation & Spatial Orientation: Assess ability to move efficiently in space without language dependency.

- Following visual route cues (symbols, maps, GPS icons),
- Orientation in unfamiliar environments,
- Decision-making at intersections,
- Ability to recover from route errors safely.

Purpose: Separate navigation skills from linguistic comprehension.

Rule Adaptability & Regulatory Awareness: measure capacity to adapt to different regulatory frameworks.

- Recognition of common international road symbols,
- Interpreting unfamiliar signage patterns,
- Adjusting behaviour when uncertain,
- Understanding of general safety principles (speed, priority logic).

Purpose: Identify learning needs related to local rules vs driving ability.

Vehicle Safety & Pre-Drive Checks: Evaluate practical safety knowledge independent of language complexity.

- Basic vehicle inspection (tires, lights, brakes),
- Dashboard symbol recognition (icon-based),
- Safe loading (if relevant to professional drivers),
- Emergency procedures (breakdown handling).

Purpose: Ensure operational safety baseline without requiring technical vocabulary.

Professional Driving Scenarios (if the person already has a driving license from home country)

- Parking in constrained spaces,
- Loading/unloading awareness,
- Time-pressure decision-making,
- Eco-driving basics,
- Fatigue awareness and management.

Purpose: Distinguish professional readiness from administrative onboarding gaps.

Cognitive & Decision-Making Skills: assess mental processing during driving tasks.

- Multitasking (steering, observing, reacting),
- Attention consistency over time,
- Decision-making under uncertainty,
- Risk prioritisation.

Purpose: Identify transferable cognitive driving skills.

Cultural & Behavioural Adaptation: detect differences due to driving culture rather than competence.

- Defensive vs assertive driving tendencies,
- Compliance vs improvisation behaviours,
- Interaction norms with pedestrians/cyclists.

Purpose: Identify transferable cognitive driving skills.

b. Gaps in Practical Compliance with EU Safety and Social Regulations

Reported Situations

- **Czechia:** Trainers report that training focuses mainly on theoretical and regulatory content (traffic rules, EU regulations, load securing), while soft skills and contextual application are largely missing. They also highlight cultural differences in the perception of rules, inspections and sanctions, which affect the practical application of EU standards in real working situations.
- **Finland and France:** Trainers report that non-EU trainees can recite driving-and-rest-time rules but struggle to apply them correctly in simulators or real driving situations.
- **Ireland:** Employers report a mismatch between certification and job readiness, where newly qualified drivers lack practical familiarity with EU operational requirements such as tachograph handling and route compliance, despite having completed mandatory training.
- **Romania:** Employers highlight frequent errors in tachograph use among newly recruited non-EU drivers, despite successful CPC completion.
- **Switzerland:** Enforcement authorities note that non-EU drivers working cross-border often misunderstand national deviations from EU rules, increasing sanction risks.

Gap Identified

Training programs prioritize theoretical knowledge and exam success, while contextualized application of EU rules remains insufficiently practiced.

Recommendation to cover Gaps in Practical Compliance with EU Safety and Social Regulations

Develop scenario-based training units (such as roadside inspection, multi-day route planning, tachograph irregularities) embedded in all partner training pathways. A shared scenario library would ensure that a driver trained in Romania acquires the same operational reflexes as one trained in France or in Switzerland.

A cross-scenario standardization will ensure consistency across countries:

- **Adapt the instructions to be understandable to non-EU trainees,**
- **Use shared scenario scripts and datasets,**
- **Define common scoring rubrics,**
- **Integrate language-neutral elements (icons, visuals, simulated dashboards),**
- **Align with EU frameworks (e.g. Regulation EC 561/2006, tachograph rules).**

These scenarios would allow training providers to:

- **Distinguish knowledge from real-world application,**
- **Identify regulation gaps vs driving competence,**
- **Deliver targeted, adaptable training pathways.**

Illustrations

Here are three examples structured scenario-based training units, designed to be standardized across countries and embedded in all partner training pathways. Each scenario includes objectives, setup, tasks, and evaluation criteria.

Scenario 1: Roadside Inspection (Control by Authorities)

Objective: Ensure drivers demonstrate practical compliance with EU regulations during an inspection, including documentation, tachograph use, and behaviour.

Scenario setup: Driver is stopped by a roadside inspector (simulation or role play). Context: international transport, mixed driving/rest periods.

Materials:

- Driver card (or simulated),
- Vehicle documents (licence, insurance, CMR),
- Tachograph records (digital or printouts).

Tasks

- Present required documents correctly,
- Explain recent driving and rest periods,
- Demonstrate ability to extract tachograph data,
- Respond to inspector questions (basic functional language),

- Identify and acknowledge a simulated irregularity (e.g. exceeded driving time).

Evaluation criteria

- Compliance with document requirements,
- Understanding of EU driving/rest rules,
- Correct use of tachograph,
- Behaviour under inspection (calm, cooperative),
- Ability to recognize non-compliance.

Learning outcome: Drivers develop standard reflexes during controls, regardless of country of training.

Scenario 2: Multi-Day Route Planning with Constraints

Objective: Train drivers plan and adapt routes in compliance with EU social regulations, integrating driving time, rest periods, and operational constraints.

Scenario setup

- Task: plan a 3-day international delivery route
- Constraints:
 - Delivery deadlines,
 - Driving/rest rules (Regulation EC 561/2006 principles),
 - Fuel stops,
 - Border crossings or traffic disruptions.
- Tools:
 - Map or GPS planning tool
 - Delivery schedule,
 - Vehicle constraints.

Tasks

- Plan daily driving periods and rest breaks,
- Identify compliant stopping points,
- Adjust route after an unexpected delay (e.g. traffic),
- Ensure compliance with:
 - daily/weekly driving limits,
 - break requirements.

Evaluation criteria

- Correct structuring of driving/rest cycles,
- Feasibility of route,
- Adaptability to disruptions,
- Time vs compliance trade-off decisions,
- Understanding of operational constraints.

Learning outcome: Drivers learn to balance productivity and regulation compliance in realistic conditions.

Scenario 3: Tachograph Irregularities & Incident Management

Objective: Develop the ability to detect, interpret, and respond to tachograph irregularities in line with EU rules.

Scenario setup

- Driver reviews a given tachograph record showing anomalies:
 - missing entries,
 - excessive driving time,
 - incorrect mode usage (e.g. “other work” vs “rest”).
- Context:
 - Possible causes: human error, technical issue, intentional misuse.

Tasks

- Identify irregularities in the record,
- Explain the issue (in simple terms),
- Propose corrective actions:
 - manual entry,
 - reporting procedures.
- Decide what to do in case of inspection,
- Demonstrate correct future use.

Evaluation criteria

- Accuracy in identifying non-compliance,
- Understanding of tachograph functions,
- Ability to propose compliant corrective actions,
- Awareness of legal implications,
- Preventive behaviour.

Learning outcome:

Drivers gain operational reflexes to avoid, detect, and manage non-compliance, rather than learning rules in isolation.

c. Gaps in Pedagogical Approaches and Learning Design

Reported Situations

- **Czechia:** Trainers report no standardized pedagogical approach for non-EU trainees, combined with a lack of didactic and methodological guidance and insufficient multimedia teaching tools. Training tends to be adapted informally (slower pace, focus on basics, use of translators), but no systematic learning design exists for diverse learner profiles.
- **Finland:** While adult-education structures exist, trainers report lacking tools to make technical regulation accessible to low-intermediate language learners.
- **France:** Trainers describe FIMO materials as text-heavy and linguistically dense, creating comprehension barriers even for motivated trainees.
- **Ireland:** Training providers are not equipped to support learners with different linguistic and cultural backgrounds, particularly due to a lack of interpretation support and adapted teaching methodologies.
- **Romania:** Training is often accelerated, leaving little room for differentiated learning or pedagogical adaptation.
- **Switzerland:** Identical training materials are used for all candidates despite highly heterogeneous learner profiles.

Gap Identified

Across all countries, curricula are designed for standard learners, not for adult migrant profiles, resulting in unequal learning outcomes.

Recommendation to cover gaps in Pedagogical Approaches and Learning Design

Adopt a shared pedagogical framework promoting simplified language, visual supports and progressive learning steps. For example, tachograph rules could be introduced visually and orally before written testing, ensuring comprehension without lowering standards.

Illustrations

Here are three concrete examples showing how to implement a shared pedagogical framework based on simplified language, visual support, and progressive learning steps. These examples follow a shared progression:

- Visual understanding first,
- Oral explanation & interaction,
- Guided practice,
- Written formalisation,
- Competency-based assessment.

Example 1: Tachograph Rules Learning Sequence

Objective: Ensure drivers understand **driving/rest regulations and tachograph use** without relying initially on complex written explanations.

Pedagogical approach

Step 1 – Visual introduction (No text or minimal keywords)

- Use timeline diagrams showing driving periods, breaks, rest.
- Colour coding: blue = compliant, orange = violation (avoid green and red since 8% of the male population is daltonian and does not differentiate green and blue).

Step 2 – Oral explanation

- Trainer explains scenarios verbally: “After 4.5 hours driving a break required”,
- Use real-life examples (day schedule).

Step 3 – Guided practice

Learners interpret visual schedules: “Is this compliant?” “Where is the mistake?”.

Step 4 – Written validation

Only after understanding: short written questions and case-based exercises.

Example 2: Roadside Inspection Behaviour Training

Objective: Train drivers to behave correctly during inspections, even with limited language proficiency.

Pedagogical approach

Step 1 – Visual scenario video (Subtitles optional, focus on actions.)

- Show a short simulation video of:
 - truck stopped,
 - document check,

- tachograph control.

Step 2 – Key actions through icons

- Provide a visual checklist:
 - show documents,
 - driver card,
 - print tachograph,
 - stay calm.

Step 3 – Role play (oral and gestures)

Learner practices with trainer: simple phrases, non-verbal communication such as “Documents”, “Wait”, “OK”.

Step 4 – Gradual formalisation

Introduce: basic vocabulary and structured dialogue.

Step 5 – Assessment

Simulated inspection scenario (practical test).

Example 3: Multi-Day Route Planning Training

Objective: Teach drivers to plan compliant routes using progressive abstraction.

Pedagogical approach

Step 1 – Visual route building

Use a map with symbols: driving segments, fuel stops, rest areas.

No numbers initially, only sequence logic.

Step 2 – Guided reasoning (oral)

Trainer asks: “Where should you rest?” “Is this too long to drive?”.

Step 3 – Introduce constraints progressively (still supported by visuals)

Add: time limits (such as 4,5h) delivery deadlines.

Step 4 – Simple calculations

Estimate: travel time, arrival windows.

Step 5 – Written and digital tools

Use: route sheets, GPS planning tools, compliance checks.

d. Gaps in Trainer Preparation and Methodological Support

Reported Situations

- **Czechia:** Trainers report a lack of specific preparation for working with non-EU drivers, including the absence of didactic and methodological guidance, and a shortage of trainers trained to teach diverse linguistic and cultural groups. Adaptation relies mainly on individual experience rather than structured training.
- **Finland:** Institutional stability supports trainers, but intercultural and language-aware teaching tools remain limited.
- **France and Romania:** Trainers explicitly report having received no formal preparation for teaching migrant drivers and rely on personal experience.
- **Ireland:** Training providers face limited capacity to support applied learning, particularly for non-EU drivers, due to time pressure within mandatory training pathways and lack of tailored practical modules.
- **Switzerland:** Trainers encounter few non-EU trainees and therefore lack exposure and pedagogical adaptation strategies when they do.

Gap Identified

Trainer capacity is treated as individual adjustment, not as a professional competence to be trained and shared.

Recommendation to cover gaps in Trainer Preparation and Methodological Support

Develop common trainer-focused modules covering adult migrant pedagogy, language-aware instruction and intercultural classroom management. A trainer in Czechia or Romania should have access to the same methodological toolkit as a Finnish or a French VET instructor. Certain elements of the support could be used by managers in contact with non-EU drivers in the industry.

Illustrations

Here are two examples of trainer-focused modules to address *gaps in trainer preparation and methodological support*, aligned with research-based practices in adult education and intercultural pedagogy.

Example 1: Language-Aware Instruction Module

Objective: Help trainers teach technical content without requiring full language mastery, ensuring comprehension of safety rules.

Key components

- Techniques for simplified language (plain language principles),
- Use of visual support and multimodal instruction,
- Strategies for checking understanding without relying on text,
- Integration of language learning into vocational training.

Practical tools

- Visual glossaries (icons and keywords),
- Demonstration-first teaching sequences,
- “Teach-back” method (learner explains back in simple terms),
- Use of digital translation aids safely.

Example application:

A Finnish trainer teaching non-native drivers:

- uses icons and diagrams for road signs,
- assesses understanding through practical tasks, not written tests.

Evidence base

- “Language-aware teaching” improves outcomes in VET for migrant learners (OECD, 2019),
- Dual coding theory: combining visuals and verbal input enhances comprehension (Paivio, 1991; Mayer, 2009).

Example 2: Intercultural Classroom & Workplace Management Module

Objective: Prepare trainers (and managers) to handle cultural differences in behaviour, communication, and expectations.

Key components

- Understanding cultural dimensions in communication : direct vs indirect communication, hierarchy perception,
- Managing misunderstandings and conflict,

- Building inclusive learning environments,
- Awareness of different driving cultures and norms.

Practical tools

- Structured debriefing techniques after misunderstandings,
- Scenario-based training such as a disagreement about safety practices,
- Guidelines for non-verbal communication.

Example application :

A Czech trainer:

- notices that some drivers avoiding asking questions and it should not be interpreted as understanding,
- adapts by introducing mandatory feedback loops.

Managers can use the same tools to:

- supervise non-EU drivers,
- improve communication in operations.

Evidence base

- Intercultural competence improves training and workplace performance (Deardorff, 2006),
- Studies show that cultural misunderstandings impact safety in transport sectors (ITF/OECD reports).

e. Gaps in Cultural Integration and Social Conditions

Reported situations

- **Czechia:** Stakeholder evidence shows that integration challenges are mainly cultural and organizational rather than technical, including difficulties in understanding EU rules, workplace expectations and communication norms. These aspects are not formally included in training, being handled informally by employers. Additionally, social isolation and limited workplace integration support are reported, while integration often occurs during waiting periods before certification through informal workplace exposure.
- **Finland:** Trainers note that non-EU drivers frequently require explicit guidance regarding Finnish workplace culture, safety communication practices and interaction with supervisors. These elements are addressed informally by trainers or employers rather than through structured training modules.
- **France:** Training providers and employers report difficulties linked to workplace norms (hierarchical relations, reporting practices), which affect retention, safety communication and employer satisfaction. These aspects are not included in mandatory driver training programs, as their content is defined by European regulations focused primarily on road safety. In practice, these topics are more effectively addressed through pre-qualification and preparatory pathways, rather than within mandatory certification training.
- **Ireland:** Language barriers affect not only certification but also workplace communication, safety understanding, and interaction with employers, indicating a lack of formal training on communication norms in professional contexts.
- **Romania:** Employers recruiting non-EU drivers report challenges related to adaptation to EU road-safety culture, employer–employee relations and individual responsibility norms. Such issues are managed at company level, as they are not covered by existing CPC training.
- **Switzerland:** Sector stakeholders indicate that cultural and workplace adaptation of non-EU drivers relies almost exclusively on employers, with limited institutional or training-based support to prepare drivers for multilingual and highly regulated professional environments.

In addition, **social conditions directly affect training continuity:**

- **Czechia:** Non-EU drivers face administrative complexity, fragmented institutional responsibilities and dependency on employers, while NGO-based integration support (language, housing, employment) remains partial. These factors can delay access to training and weaken overall integration continuity.

- **France:** Housing instability during training periods is identified by VET providers as a frequent cause of absenteeism and dropout among non-EU trainees.
- **Romania:** Employer-provided accommodation facilitates rapid recruitment but increases dependency and limits broader social and cultural integration.
- **Ireland:** Dependence on work permits, including uncertainty around permit renewal conditions and timelines, creates instability during early employment and training phases, discouraging long-term planning and affecting continuity of professional integration.
- **Switzerland:** High housing costs and mandatory health-insurance procedures generate stress during pre-employment and early training phases.

Gap identified

Across partner countries, cultural integration and workplace adaptation competences are not included in the mandatory curricula and examinations required for obtaining the Certificate of Professional Competence, whose content is defined by European directives and primarily focused on safety, regulation and eco-driving.

This is consistent with the objectives of these programs.

However, complementary pathways or specific programs designed to address the specific needs of migrant drivers (language for work, workplace norms, social integration) are not systematically developed or generalized across countries.

As a result:

- these competences are often addressed informally by employers or training providers,
- access to adapted support remains uneven,
- and successful integration depends largely on local initiatives rather than structured systems.

Recommendation to cover gaps in Cultural Integration and Social Conditions

Integrate structured orientation and cultural-integration modules within vocational training pathways, covering for the non-EU drivers:

- **workplace norms and professional culture in EU transport companies,**
- **communication practices with employers, colleagues and enforcement authorities,**
- **basic understanding of rights, obligations and everyday life organization in the host country.**

The aim of these modules is to:

- Support both drivers and training staff,
- Address integration at professional and personal levels,
- Reduce reliance on informal employer practices,
- Ensure equity and consistency across national contexts.

Formalizing these elements through complementary modules would reinforce practices currently delegated to employers, without modifying the mandatory content defined by European directives. These modules could be integrated alongside existing training programs for those who need them, or delivered through pre-qualification pathways prior to initial certification, in order to support exam success and improve employability.

For the trainers, and eventually for the managers in the industry, there could be some training to identify and respond to social barriers affecting learning (housing, stress, dependency).

Illustrations

Here are two concrete training module examples addressing *cultural integration and social conditions*, one focused on culture and one on social barriers, designed for integration into VET pathways and usable across EU contexts.

Example 1: Workplace Culture & Communication in Transport

Objective : Enable non-EU drivers to understand and adapt to professional norms, communication styles, and expectations in EU transport companies.

Module structure

1. Visual & Practical Introduction

Short **video scenarios** showing:

- driver–dispatcher interactions,
- roadside inspections,
- teamwork in warehouse operations (e.g. coordination with warehouse staff, loading/unloading organisation, respect of safety procedures on site),
- Highlight differences in: punctuality norms, hierarchy and initiative, safety-first culture.

2. Key Concepts (Simplified and Visual)

Workplace expectations:

- Punctuality,
- compliance over speed,
- teamwork and reporting issues,
- Communication practices: clear and direct instructions, confirming understanding, when to ask questions.

3. Role-Play Scenarios

- Calling a dispatcher to report delay,
- Interaction with police during inspection,
- Reporting a technical issue,
- Focus on functional communication, not perfect language.

4. Rights and Responsibilities

- Working hours and rest rights,
- Basic employer/employee obligations,
- Importance of compliance with EU safety rules.

5. Assessment

- Practical simulation: handle a delivery issue, communicate with employer,
- Scenario-based questions (oral and visual).

Expected outcomes

- Drivers adopt shared professional behaviours across countries,
- Reduced misunderstandings with employers and authorities,
- Improved safety compliance.

Example 2: Identifying and Addressing Social Barriers (for Trainers & Managers)

Objective: Equip trainers and managers to **detect and respond to social factors** affecting learning and job performance (housing, stress, isolation, administrative dependency).

Module structure**1. Awareness of Social Risk Factors**

Common issues affecting migrant drivers:

- unstable housing,
- financial stress,
- isolation / lack of support,
- administrative complexity.

Link to impact on: concentration, fatigue, absenteeism, safety risks.

2. Identification Tools

- Early warning signals: repeated lateness, difficulty focusing, withdrawal or silence,
- Simple checklist for trainers/managers,
- Structured non-intrusive conversations.

3. Practical Response Strategies

How to:

- adapt training pace temporarily,
- provide clear structure and reassurance,
- refer to support services (housing, legal, social),
- define boundaries of trainer/manager role: support without replacing social services.

4. Communication Techniques

- Active listening,
- Non-judgmental questioning,
- Cultural sensitivity in discussing personal issues.

5. Scenario-Based Practice

Case 1: Driver distracted due to housing instability

Case 2: Driver dependent on employer for documents

Case 3: Stress leading to errors in tachograph use

Participants decide:

- what to observe,
- how to react,
- what support to mobilize.

6. Tools for the Workplace

- Referral guide (local services),
- Simple monitoring dashboard,
- Guidelines for escalation.

Expected outcomes

- Trainers and managers can detect hidden barriers to learning,
- Reduced risk of training failure or safety incidents,
- More consistent integration outcomes across EU countries.

Executive Summary and Roadmap for Implementation

Purpose and Strategic Context

This part synthesizes the findings of the Comprehensive Needs Assessment (WP2A1) and the Gap Analysis (WP2A2) conducted within the TRAINDRVR2EU project. It aims to:

- Provide a structured executive summary of key gaps identified across partner countries;
- Translate these findings into a coherent roadmap for the development and implementation of harmonized training solutions;
- Support the transition towards a consistent, inclusive, and operationally effective European training framework for non-EU professional drivers.

The analysis confirms that regulatory frameworks governing access to driver qualification are broadly aligned at European level, resulting in relatively homogeneous certification pathways across partner countries. In particular, European regulations do not allow for the recognition of prior professional experience as an alternative to mandatory qualification requirements.

However, significant differences arise in migration policies, labour market structures and funding systems, which in turn affect access to training, the organisation of pathways, and integration outcomes for non-EU drivers.

These differences concern in particular:

- migration frameworks and access to permits,
- the role and structure of integration policies,
- the financing of training pathways (publicly funded vs. market-based systems),
- the availability of complementary support mechanisms.

Identified Gaps

1. Structural Context in Qualification Recognition and Access

Across partner countries, access to the profession of driver is governed by European regulatory frameworks that define mandatory qualification requirements and do not allow recognition of prior professional experience as an alternative pathway to certification.

This results in relatively homogeneous access conditions across Member States, where all candidates must follow the same certification processes regardless of their previous experience outside the European Union.

The main challenge therefore does not lie in the absence of recognition mechanisms, but in how candidates access and progress through these pathways, in particular:

- delays linked to administrative and migration procedures,

- difficulties in accessing training,
- lack of preparatory or complementary pathways for specific target groups.

2. Gap in Practical Compliance with EU Safety and Social Regulations

Training programs demonstrate a strong focus on theoretical knowledge and certification requirements, while contextualized application of EU regulations remains insufficiently developed. Consequences include:

- Limited operational readiness of newly certified drivers;
- Persistent errors in tachograph use and compliance practices;
- Increased exposure to sanctions and safety risks.

3. Pedagogical Gap in Learning Design

Existing curricula are primarily designed for standard learner profiles, without systematic adaptation to the needs of adult migrant learners with heterogeneous linguistic and educational backgrounds. This leads to:

- Reduced comprehension of technical and regulatory content;
- Higher failure and dropout rates;
- Unequal learning outcomes across learner groups.

4. Gap in Trainer Preparation and Methodological Support

Trainer competencies related to language-aware teaching, adult migrant pedagogy, and intercultural management are not formally structured and remain largely based on individual initiatives. As a result:

- Training quality varies significantly between providers;
- Existing pedagogical innovations are not systematically shared;
- Trainers lack tools to effectively support diverse learner profiles.

5. Gap in Cultural Integration and Social Conditions

Cultural adaptation and social factors are not formally embedded in training programs, despite strong evidence of their impact on learning, safety, and retention. Key issues include:

- Misalignment in workplace expectations and communication practices;

- Social instability (housing, administrative dependency, stress);
- Reliance on employers for informal integration support.

Cross-Cutting Analysis

The findings confirm a systemic misalignment between:

- Formal certification systems, focused on regulatory compliance;
- Operational realities, requiring contextualized, practical, and adaptive competencies;
- Integration needs, encompassing linguistic, cultural, and social dimensions.

The Needs Assessment further demonstrates that successful integration depends on a combination of language-aware training, early skills assessment, prepared trainers, employer engagement and structured onboarding, and stable social conditions.

Strategic Priority Axes

To address these gaps, five strategic axes have been identified:

1. **Shared pre-training competence assessment** separating skills from language and administrative factors.
2. **Scenario-based EU compliance training** ensuring consistent operational safety standards.
3. **Language-aware and migrant-adapted pedagogical methodologies** applied across partner countries.
4. **Dedicated training modules for trainers**, professionalizing migrant-focused instruction.
5. **Integration-aware training design** linking vocational learning with social stability conditions.

Roadmap for Production, Implementation and Expected Strategic Impact

Confirming the projected roadmap in TRAINDRVR2EU application form, the roadmap is structured into five phases to ensure coherent development and implementation.

Phase 1 establishes a harmonized framework by defining a competence-based approach aligned with EU standards, supported by a modular architecture and common pedagogical principles such as simplified language and visual learning.

Phase 2 focuses on developing core components, including a multi-dimensional pre-training assessment, a shared library of scenario-based training materials, a pedagogical toolkit with structured learning sequences, a trainer capacity-building program, and modules supporting cultural integration and social inclusion.

Phase 3 consists of piloting these components in real training environments, collecting feedback from stakeholders, and refining both content and delivery methods.

Phase 4 ensures evaluation and harmonization through common indicators, cross-country analysis, and the finalization of shared tools and methodologies.

Finally, Phase 5 supports large-scale deployment and sustainability by creating a digital platform, promoting adoption among stakeholders, integrating the approach into existing frameworks, and building a community of practice, leading to a sustainable EU-wide training ecosystem.

The implementation of this roadmap will contribute to:

- Improved access and efficiency of training pathways;
- Enhanced compliance with EU safety and social regulations;
- Reduced mismatch between certification and operational readiness;
- Increased equity in training outcomes across countries;
- Stronger integration and retention of non-EU professional drivers.

Conclusion

The combined analysis demonstrates that the primary challenge is not regulatory alignment, but pedagogical and structural, highlighting the need to reconfigure training systems to better reflect operational realities and learner diversity.

By grounding recommendations in real national situations, Deliverable 2 provides a concrete, evidence-based justification for the harmonized training framework developed in subsequent work packages.

It establishes a clear bridge between WP2 and WP3, ensuring that training materials and digital tools respond directly to documented gaps, real learner experiences and trainer constraints, in full alignment with the TRAINDRVR2EU application objectives.