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CEEP opinion on the proposal for a Quality Framework for Traineeships

Executive summary

- CEEP recognises the positive role of traineeship in facilitating the transition of young people from education to the labour market and help bridging the gap between the education world and the labour market and as representative of socially responsible employers – CEEP encourages them to maintain a high level of traineeship quality in terms of learning content and fair working conditions.
- CEEP agrees and strongly supports the idea that traineeships shall not be considered as proper jobs and thus do not need to be as explicitly regulated as real employment. In this regard, CEEP wishes to recall the important diversity of the Member State's regulations in this field and the difficulties they imply for addressing traineeships at EU level.
- Therefore, CEEP welcomes the choice of a council recommendation for implementing the quality framework for traineeships. Indeed, the absence of binding mechanisms which is the characteristic of a council recommendation could offer the QFT the level of flexibility needed for its effective and efficient application in Member States having very diverse ways of regulating traineeships statuses.
- However, CEEP's view is that a too detailed proposal at the EU level regarding the specific form, dispositions and conditions a traineeship agreement should have, might have detrimental effects to the general and most important objective of multiplying traineeships schemes in Member States.
- CEEP also advocates for a more comprehensive approach regarding the reasonable duration of traineeships. The closed approach chosen by the Commission regarding this issue is regrettable. At EU level, traineeships tend to last for a year. This duration would better reflect the full diversity of traineeships schemes at the EU level. Regarding traineeships' duration, the emphasis shall always be put on the time necessary to develop specific work-related skills and qualifications which may take longer than a year.
- CEEP strongly welcomes and supports the references to the important role of social partners in implementing the QFT. In this respect, the social partners in different sectors could participate in implementing the QFT on several levels through for instance the collection and monitoring of best practices regarding effective transitions from education to the labour market through traineeships schemes.

Introduction

On the 4th of December 2013 the European Commission presented its proposal for a Council Recommendation on a “Quality Framework for Traineeships” (QFT). The objective of this initiative is to offer guidelines to ensure for traineeships to be of “high quality in terms of learning content and working condition”. The recommendations’ scope of application covers solely so-called ‘open market’ traineeships; it explicitly does not relate to “traineeships forming part of academic and/or vocational curricula, neither the one which form part of mandatory professional training”.

CEEP recognises the positive role of traineeship in facilitating the transition of young people from education to the labour market and help bridging the gap between the theoretical knowledge gained in education and the skills and competences needed within the workplace. CEEP also appreciates the commitment of traineeship providers and – as representative of socially responsible employers – encourages them to maintain a high level of traineeship quality in terms of learning content and fair working conditions.

The need for clarity on open-market traineeships

Much care should be taken when dealing with the difficult status of open-market traineeships, which has been answered to in various ways in the EU. Traineeships are, at the European level, characterised by a great diversity in terms of type, focus, duration, regulation and extent of social partner involvement. CEEP agrees and strongly supports the idea that traineeships shall not be considered as proper jobs and thus do not need to be as explicitly regulated as real employment. However, open-market traineeships cannot be easily linked to the sphere of education since they do not include the participation of an education institution in the traineeship agreement. In this regard, CEEP wishes to recall the important diversity of the Member State’s regulations in this field and the difficulties they imply for addressing traineeships at EU level.

Educational purpose of the traineeship central for ensuring quality transitions from education to the labour market

The explicit purpose of obtaining a qualification and/or developing professional, work-related skills shall always be the core of any traineeship in order for them to play their part. They have been recognized, in the context of the rise of the number of unemployed young people, early school-leavers and NEETS, as an effective way to cross the bridge between education and the labour market. Our shared responsibility is to raise the quality of this specific transition in a person’s professional life where sustained employability has become an essential remedy to the rise of mass unemployment in Europe and a necessary mean for the definition of our future labour markets.

Therefore, CEEP can to some extent share the diagnostic to which the Commission sheds light on in its proposal for a QFT. In addition, the insufficient learning content may encourage the shortening of skills and their mismatch with labour market needs.

Choice of instrument

Considering the diversity of the Member States’ regulatory frameworks, CEEP welcomes the choice of a council recommendation for implementing the quality framework for traineeships. Indeed, the absence of binding mechanisms which is the characteristic of a

council recommendation could offer the QFT the level of flexibility needed for its effective and efficient application in Member States having very diverse ways of regulating traineeships statuses.

Skills and competence mismatch addressed in the QFT

The QFT includes under its title “proper recognition of traineeships” a disposition stipulating that traineeship provider should certify through, for instance, a letter of reference, the knowledge, skills and competences acquired during traineeships. This particular disposition is of great importance considering the skill and competences mismatch in the EU labour market. Thus according to CEDEFOP datas, it is estimated that in 2020, 31,5% of all jobs will need tertiary-level qualification and that around 34% of the labour force will have them. Some 50% of jobs will require medium-level qualifications and around 48% of the labour force will be qualified at that level.

Also, in a recent CEEP and European Federation of Education Employers (EFEE) project: “Current and Future Key Competence Needs in Modern Public Services” our organizations highlighted the need for better matching labour market needs and needs in modern public services with learning and education outcomes. Europe’s challenge is now not only to improve skill levels through investment in the education sector, but also to match people with the right skills to the right jobs. In this context, part of the problem is the incomplete information on the labour market, differences between people and transaction costs may lead to people being mismatched with their jobs. Tackling mismatch through better labour market information and efficient job placement services should therefore count among the top EU priorities for youth unemployment policy making.

Thus, the traineeship provider should properly help its trainee develop the competencies necessary to apply, in practical situations, the skills that the trainee nurtured during the education and therefore complete them.

Information content of the written agreement

The QFT may contribute to improve the information accessible to the future trainee before the start of a traineeship period and during its occurrence. It may do so by stating that the quality of the information delivered to the trainee is essential for giving him the opportunity to make enlightened choices.

However, CEEP’s view is that a too detailed proposal at the EU level regarding the specific form, dispositions and conditions a traineeship agreement should have, might have detrimental effects to the general and most important objective of multiplying traineeships schemes in Member States.

Indeed, all enterprises do not always have the means to monitor traineeships since this requires constant care and management resources. The obligation of signing a written agreement may reveal itself to be an additional administrative burden for SMEs. In this regard, the terms and conditions of traineeships should stay at the national level, foremost in the hands of the Social Partners since this level is the most relevant one to take account of the diversity of national systems in Europe and not discourage enterprises to provide for new traineeship schemes.

Considering the need to tackle abuses, particularly present in open-market traineeships schemes, which tend to be less regulated, we agree that, as a general principle, the traineeship agreement's content whatever form it takes shall remain exact and reasonable.

The length of the traineeships

CEEP advocates for a more comprehensive approach regarding the reasonable duration of traineeships. The closed approach chosen by the Commission regarding this issue is regrettable. By saying that "as a rule, the duration of traineeships does not exceed six months" the EC eludes some of the results of the study on a comprehensive overview on traineeships arrangements in Member States of May 2012 which concludes that at EU level, traineeships tend to last for a year. This duration would better reflect the full diversity of traineeships schemes at the EU level. However as the Commission recognises the emphasis shall always be put on the time necessary to develop specific work-related skills and qualifications which may take longer than a year. As for the conditions and circumstances in which a traineeship agreement may be renewed or extended CEEP agrees that they need to be clarified according to each national situation.

Promotion of cross-border traineeships

Various tools and initiatives have been created and launched at the European level in order to combat effectively youth unemployment notably through the EURES network, Erasmus + (which now includes Erasmus (students) Comenius (school level education), Grundtvig (adults) and Leonardo Da Vinci (apprentices), the European alliance for apprenticeship and of course the important "youth guarantee", in phase of implementation in the EU Member States.

However we must ensure that all the instruments respond and complement each other in a coherent and coordinated framework. CEEP agrees on the diagnostic that youth transnational mobility may be limited by legal complexity and by lack of transparency. Therefore, limiting unnecessary administrative burden and enhancing the fluidity of the exchange of information between the different programs should be constantly addressed.

An option for a more efficient policy-mix

However, as the Commission states in its staff working document, the option of creating an information website attached to EURES would support the effective extension of EURES to traineeships and at the same time encourage transnational traineeships. It would contribute to gather and publish precious information on the different national regulatory framework, which could secure and enlighten the choices made by young people wishing to engage in a traineeship out of their national borders. Therefore CEEP believes that a policy mix including the creation of an information website for trainees with all regulations and types of traineeships per Member State set up within the EURES portal and the Council Recommendation on a QFT would bring better results and contribute to realize the expectations we have for EURES: create a proficient tool for the facilitation of the allocation process on the labour market while increasing transnational labour mobility.

Determine a proper level for addressing recommendations toward the implementation of the youth guarantee

Even though CEEP agrees that the ESF should be part, where possible, of the finance for effective implementation of the Youth Guarantee at the Member States level, it doubts the relevance of any mention in the QFT of additional recommendations defining how the Member States should spend the ESF resources in order to develop traineeships.

Therefore CEEP doubts the pertinence of the disposition of the QFT stating that:

“The ESF as well as the Youth Employment initiative can be used to increase the number and the quality of member states’ traineeship schemes. **This involves a possible contribution to the cost of the traineeships including, under certain conditions, a part of the remuneration. In addition, they can also support the costs of other trainings that young people may pursue outside their traineeship, e.g. language courses.**”

Indeed, the Council recommendation establishing a youth guarantee says that the Member States should ensure that “all young people up to the age of 25 years receive a good-quality offer of employment, continued education, an apprenticeship or a traineeship within four months.”

However CEEP believes that the Commission should address its recommendations toward the implementation of the youth guarantee inside the framework of the European Semester, better suited for such processes. Furthermore CEEP is highly dubitative toward the financing of part of the internship remuneration by the ESF which could certainly disperse its action and therefore reduce its overall pertinence and efficiency.

Social partners’ possible actions

CEEP strongly welcomes and supports the references to the important role of social partners in implementing the QFT. In this respect, the social partners in different sectors could participate in implementing the QFT on several levels through for instance the collection and monitoring of best practices regarding effective transitions from education to the labour market through traineeships schemes.