

Brussels, 11 July 2012

## CEEP response to the Commission's consultation on Quality Framework for Traineeships

### Introduction to European Commission action

The rise of unemployment among young people in the EU has been dramatic. In this context traineeships can play a key role in increasing the access of young people to the labour market. Traineeships can bridge the gap between the theoretical knowledge gained in education and the skills and competences needed at the workplace and thus increase the chances of young people to find a job. In many cases this may provide a first step towards decent and sustainable work.

Nevertheless, the European Commission states that traineeships in some cases do not play the role they should. Traineeships may be abused as a source of cheap or free labour by employers. As a response, the Europe 2020 flagship initiative 'Youth on the Move' issued in 2010 announced that the Commission would propose a quality framework for traineeships including their transnational dimension, the role of the social partners and corporate social responsibility related aspects.

In April 2012 DG Employment, Social Affairs and Inclusion published a consultation paper on this item.

The scope of the questionnaire is how to better improve traineeships, defined as *"a work practice including an educational component (either as part of a study curriculum or not) which is limited in time. The purpose of these traineeships is to help the trainee's education to work transition by providing the practical experience, knowledge and skills that complete his/her theoretical education."*

The initiative will not cover apprenticeships, which have to be seen in another legal and organizational context. Neither should it cover short term spells of work experience organized by schools as part of young people's school education, nor training programmes for staff already employed by an organisation.

The EU Commission is raising the following questions:

1. Is there a need for European level action regarding the quality of traineeship?
2. What should be the scope of such an initiative?
3. What should be the form such an initiative at EU level should take?
4. Are the elements in the EU Staff Working document relevant?
5. What further elements are suggested?
6. Any other comments?

## **CEEP's response to the various questions**

### **1. Is there a need for European level action regarding the quality of traineeship?**

CEEP shares the view of the Commission that the provision of high quality traineeships requires the involvement of all relevant stakeholders. In the context of this paper, which is dealing primarily with the transfer of students from the higher education system to professional life, the social partners are especially concerned.

CEEP shares the Commission's view that promoting good quality traineeships contributes to meeting the objectives of the Europe 2020 strategy, in terms of facilitating good labour market transitions and promoting and facilitating geographic mobility for young people. Good quality traineeships can also benefit future employers and promote social cohesion by ensuring that all young people, not only those who are privileged by belonging to families who can help them economically, can take advantage of the opportunities available. In this way Europe will in future be able to make full use of all our young people's talents.

### **2. What should be the scope of such an initiative?**

An EU-level quality framework, elaborated in cooperation with relevant stakeholders such as government representatives, the social partners and youth organisations, which could contribute to improving the quality of traineeships within the EU.

CEEP emphasises that any initiative should concentrate on traineeship and that apprenticeship is something different. We therefore agree with the Commission's proposal that the initiative should not cover apprenticeships, which have to be seen in another legal and organisational context. Neither should it cover short term spells of work experience organised by schools as part of young people's school education, nor training programmes for staff already employed by an organisation.

CEEP strongly believes that all young people from the age of 14 onwards should, regardless of income or social background, have the right and opportunity to undertake work experience as part of their education, regulated at Member State level. In addition, traineeships should be available to help young people make the transition from school, college or university to employment. These traineeships can, but will not necessarily, lead to the offer of a job. It is these traineeships that should be covered by the scope of this initiative.

### **3. What should be the form such an initiative at EU level should take?**

An EU-level quality framework in the form of a set of overarching principles, elaborated in cooperation with relevant stakeholders such as government representatives, the social partners and youth organisations, which could contribute to improving the quality of traineeships within the EU. Such a framework would be sufficiently flexible to take account of the diversity of systems and practices in different Member States.

In addition, EU financial support to fund people to work with local organisations to organise and administer trainee schemes would help greatly to reduce the burden on employers and educational bodies and to increase the uptake of traineeships. See point 4 (b) below.

The EU could also help to build networks and to share good experience.

#### 4. Are the elements in the EU Staff Working document relevant?

The Staff working paper proposes the following elements:

##### (a) Conclusion of traineeship agreement.

CEEP shares the view that a traineeship agreement should be the basis of all traineeships and should cover the professional and learning objectives, the duration and, where applicable, the rate of remuneration/compensation.

The agreement should be agreed before the traineeship starts. It should be transparent and should set out clearly the rights and obligations of the respective parties.

##### (b) Definition of professional and learning objectives and tutoring/guidance.

CEEP agrees that traineeships should contain useful educational elements. It would be helpful having a personal supervisor in the host organisation for each trainee that is hosted. The supervisor figure should monitor the trainee's progress and explain general work procedures and techniques. The supervisor should also provide feedback to the trainee about his/her performance in the form of mid-term and final evaluation.

CEEP shares the view that the easiest way of defining and monitoring the learning content of a traineeship is by involving an educational institution. This is especially the case where small and medium-size enterprises (SMEs) are providing placements, as they could be overwhelmed by having to meet the requirements of providing adequate tutoring. Whilst happy to provide an actual placement, they may lack the resources, in terms of time and personnel, to organise and administer the practical aspects of arranging a traineeship and assessing its educational quality. Many businesses will happily take trainees if someone else will make it easy for them by doing the related paperwork and administration. This is why it makes sense to increase the number of traineeships as part of study curricula.

We believe that sectoral or regional agreements between relevant stakeholders can help to address these problems. These could clearly include partnerships between businesses and educational institutions. The EU could help to build such networks and to share good experience. In addition, EU financial support to fund people to work with local organisations to organise and administer trainee schemes would help greatly to reduce the burden on employers and educational bodies and to increase the uptake of traineeships.

##### (c) Proper recognition of the traineeship.

CEEP shares the view that a proper certificate should be obligatory at the end of a traineeship. This certificate should state knowledge, skills and competences which have been acquired during the traineeship.

The Europass mobility document might be used as a suitable tool. However, we note that this tool, especially in small and medium-sized enterprises, is still poorly known. Further efforts have to be done to improve knowledge about Europass.

(d) Reasonable duration.

The text states that a three to six months traineeship period is deemed appropriate. At the same time it points out that the appropriate duration depends on the type of traineeship (part of an education/training programme or undertaken after graduation).

CEEP thinks that an appropriate duration is hard to fix, though we would suggest that a period of between 2 and 39 weeks as recommended for the current “Youth on the Move” programmes would be an appropriate yardstick. As a rule the length and tasks of the traineeship should correspond to specified learning objectives that are shared with the student at the beginning of his/her traineeship.

In no cases should traineeships be used as substitution for regular employees.

(e) Adequate social protection and remuneration of the trainee.

Good-quality traineeships need not necessarily be paid by the host organisation, but adequate financial support should be made available so that young people from all social and economic backgrounds can benefit from these opportunities. In any case CEEP advocates that trainees should at least have adequate social protection in the country of their traineeship, in particular health and accident insurance cover.

When discussing the possibility of remuneration, the effect of the trainee’s work should be taken into consideration. It should be noted that training costs will arise for the enterprise. On the other hand, enterprises may directly profit from the work done by the trainee. The question of remuneration should take both aspects into account.

(f) Transparency of information on rights and obligations.

As traineeships could be organised in various ways, it is hardly possible to lay down general rules on transparency. The easiest field may be where traineeships are part of educational systems or subject to specific professional regulation. In these cases standards should be developed by professional and/or sectoral organisations.

Candidates should at the very least be notified of the conditions of the traineeship before the start, and should have had the opportunity to agree and sign a training agreement (see point 4 (a) above). Enterprises should be encouraged to make these conditions public in advance (e.g. via the internet).

5. What further elements are suggested

We think that the document has identified the main fields of action.

6. Any other comments