

# Position Paper

## UEAPME<sup>1</sup> position on a Quality Framework for Traineeships

### Introduction

On 18 April 2012 the European Commission launched a consultation on a Quality Framework for Traineeships aimed at increasing the provision of traineeships in Europe in qualitative and quantitative terms. It is part of the Communication “Towards a job-rich recovery” recommending measures in particular on the demand side in order to stimulate job creation and growth in Europe.

### General Comments

UEAPME regards the high youth unemployment averaging at 22.1% in Europe with great concern, rising in some countries to around 50% and displaying huge differences among Member States. To make matters worse, of those young persons unemployed, around one in four have been long-term unemployed for over one year. Moreover, the 4 million job vacancies in Europe demonstrate a substantial skills mismatch.

Traineeships play an important role for the employability of young people to gain practical work experience and skills in line with business needs and for facilitating transitions from education and training into work. However, UEAPME points out that traineeships, in all their diversity (a.o. legal, contextual) are mainly an issue for the Member state level. The EU can promote some broad common principles, but should refrain from imposing strict rules. Clearly any detailed recommendation or even regulation would have a negative impact on the provision of traineeships.

We do not deny that some abuses of traineeships may exist in certain sectors and notably in those member states with inefficient labour markets. Revising overprotective employment legislation and ensuring sufficient labour market flexibility are measures which have proven to ease access to jobs by improving labour allocation and reducing labour market segmentation.

UEAPME considers the consultation is rather focused on trainees and substantially overlooks the point of view of companies and education and training providers. The Commission ought to better recognise the need to make traineeships more appealing for SMEs, including giving support to small companies to offer internships, rather than concentrating on the possible deficits. In a certain number of countries SMEs are traditionally involved in apprenticeships, but for a small business it is more difficult to provide both apprenticeships, as well as traineeship placements despite the fact that some do invest in both.

- **Rationale for SMEs to offer traineeships**

Whilst the vast majority of SMEs and crafts businesses offer apprenticeships or alternating VET training schemes, traineeships can indeed be highly beneficial for improving the intake of well qualified persons, including tertiary level graduates, for the following reasons:

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<sup>1</sup> UEAPME subscribes to the European Commission's Register of Interest Representatives and to the related code of conduct as requested by the European Transparency Initiative. Our ID number is [55820581197-35](#).

1. screening purposes to determine whether a trainee might become a potential employee (a type of trial period);
2. some contribution to productivity, but to a very limited degree;
3. corporate social responsibility, including a better image of the company.

Therefore creating red tape and disproportionate obligations risks crowding out companies and would have the opposite effect.

## 1. Scope of the initiative at EU level

- **Definition**

UEAPME agrees with the definition of traineeships outlined in the Commission proposal. However, they must be clearly distinguished from apprenticeships, which must not be included.

UEAPME also warns about the risk of strongly promoting traineeships to the detriment of well established or newly created apprenticeship systems, simply because setting up apprenticeship systems is more costly, requires more long term commitment and takes more time. Traineeships should not be fostered as an easy option to the disadvantage of apprenticeships, since the value and final outcomes of both do not compare.

- **Scope**

We support a European quality framework for traineeships, but limited to:

1. traineeships which form optional or compulsory part of academic and/or school-based vocational curricula;
2. as part of mandatory professional training (such as law, medicine, teaching, architecture);
3. transnational traineeships.

UEAPME points out that it needs to be sufficiently flexible and notably concern traineeships where public financing is involved, such as the EU's education and training programme or ESF.

Organising transnational traineeships remain complex. At the same time learning mobility can involve high gains for the individual in terms of enhancing adaptability, communicating in a foreign language and fostering specific technical skills and knowledge, as well as for the host and sending companies. It should be exploited and thus also contribute to meeting the EU's mobility benchmarks.

## 2. Form of the initiative at EU level

- **Form**

UEAPME agrees with the proposal for a Recommendation, albeit with a clearly limited scope, taking into account national specificities. UEAPME underlines that quality traineeships require first and foremost a strong involvement of employers. Therefore the particularities of SMEs need to be recognised, i.e. in relation to size and resources, alongside the economic realities and new uncertainties due to the crisis. Good arguments are required on the added value for employers to increase their motivation to host trainees.

- **Social Partners**

Social partners have a role to play in supporting the provision of traineeships. In cases of abuse of traineeships, notably sectoral social partners are well placed to seek adequate solutions for the sectors concerned.

- **Role of the EU**

The Commission should improve access to funding for traineeships in particular through the ESF – avoiding underused resources through enhanced support - and through the EU's education and training programme. UEAPME fully agrees with the greater resources being allocating to transnational traineeships through the current EU's education and training programme and its successor.

More information should be provided to make more visible the availability of traineeships and foster transparency of the different systems, including through statistics. Facilitating exchanges of experiences and best practices between Member States is also highly desirable. For example, guidance on traineeships was recently produced by the German government in cooperation with the social partners, including the German Confederation of Skilled Crafts (ZDH).

### **3. Main elements for determining high quality traineeships part of a quality framework**

UEAPME endorses some of the principles outlined, but emphasises the need to avoid an overly detailed and prescriptive approach. In addition, notably the remuneration aspect should not be included.

Recognising certain key common principles at EU level, such as having a traineeship agreement, agreed learning objectives, recognition of traineeship and a certain length of the internship is useful. However, the level of details provided by the EU Commission on all these principles is strongly rejected by UEAPME, as it goes against the subsidiarity principle and will not improve the quality and availability of internships.

With regard to remuneration and social security UEAPME highlights that both issues lie outside of EU competence. In addition, the term “remuneration” is not adapted for traineeships. Furthermore, rights and obligations do not only concern the employer, but also necessitate respect and commitment from the trainee, as well as the education and training provider.

On transnational mobility the training agreements and quality commitment used in the Erasmus and Leonardo da Vinci programmes are already useful reference frameworks.

### **Conclusion**

To conclude, traineeships are a valuable means to facilitate access to the labour market. However, due to the diversity of traineeships in Europe any European framework should be limited to broad general principles leaving sufficient flexibility to deal with the national realities. Traineeships require investments from companies and therefore any prescriptive “one size fits all” approach at European level would be detrimental to the aim of getting more young people into work. On the contrary, favourable conditions and incentives are required for employers to continue to offer traineeships successfully.

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