

European Commission  
DG Employment, Social Affairs and Inclusion, Unit C3  
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Per E-mail: EMPL-QUALITY-STAGES@EC.EUROPA.EU

11th of July 2012

**Subject:**

**Public consultation on Quality Framework for Traineeships  
Response by the European Federation of Education Employers**

Dear Madam/Sir,

In answer to the public consultation of DG Employment, Social Affairs and Inclusion on a Quality Framework for Traineeships, I am replying on behalf of the European Federation of Education Employers (EFEE). EFEE is the recognised European social partner organisation for employers in education. Our members are active at all levels of education from pre-school to higher education and research. Most of our member organisations are national associations of education providers or ministries of education (or equivalent); we are mostly public providers of education, but also have some private providers in membership.

**Key points**

1. Traineeships (as defined in the Commission's staff working document, ie as distinct from apprenticeships) are without doubt useful bridges between education and the labour market. They allow students to learn about the world of work, and in particular to develop their so-called soft skills, such as teamwork and customer orientation; and they give employers an opportunity to appraise potential long-term employees while also demonstrating corporate social responsibility in complementing the students' academic programme in practical ways.
2. At a time of alarmingly high, and increasing, levels of youth unemployment, such traineeships need to become much more widely available.
3. At the same time, students need assurance that traineeships are not open to abuse and exploitation by employers.
4. Putting these two basic points (growing demand and the need to prevent abuse) together, a strong case can be made out for a co-ordinated approach across the EU, in particular by mobilising Erasmus, Social Fund and other sources of EU finance on a

substantial scale in order to support national traineeship programmes for those who leave education without being able to find employment (or apprenticeship, or long-term training such as for medicine, law or teaching). Such EU funding should be matched by other resources from national governments and employers.

### **EFEE responses to the consultation questions**

1. *Is there a need for European level action regarding the quality of traineeship?*  
Yes, provided this incentivises employers to participate in high quality national traineeship programmes.
2. *What should be the scope of such an initiative?*  
It should cover all those leaving full-time education who are unable to find employment. It should not be limited to those leaving university, it should also cover school leavers not going on to tertiary education and those leaving vocational education. The European initiative should support programmes that are open to all employers, including those in the public sector.
3. *What should be the form such an initiative at EU level should take?*  
There should be two dimensions to such an initiative: funding and the promotion of good practice. Funding could be by means of EU financial support to national programmes which meet defined EU standards (including rules for matching resources from member states and from the employers concerned). The promotion of good practice can be fostered by European networks, facilitated by the Commission, and the production of good practice examples and guidelines.
4. *Are the elements in the EU Staff Working Document relevant?*
  - (a) We agree that a written agreement should be signed by employer and trainee before the traineeship starts. This should be comprehensive and cover learning objectives as well as issues like duration of the agreement and compensation. At the same time it needs to be expressed simply and clearly, without use of jargon. The Commission can consult stakeholders on the drafting of templates for such agreements, which could then be adjusted at national level.
  - (b) There should be mid-term and final evaluations of the traineeship, allowing both parties to state what has been learnt (and also how the experience could have been improved). To assist smaller employers to formulate and monitor the learning content of traineeships, member states should be encouraged by the Commission to make arrangements, including necessary financial support, for VET institutions to help employers on a three-step process: identifying the trainee's skills and

competences at the start of the traineeship, setting out a programme for improving those skills and competences during the traineeship, and independently auditing the progress made at the end of the traineeship.

(c) EFEE agrees that it would be good practice for traineeships to be concluded with a written certificate stating the knowledge, skills and competences that have been acquired or enhanced during the traineeship. The certificate should be signed by the employer or a senior manager and show their contact details for future reference. As in (a) above, the Commission can facilitate the drafting of templates for such certificates.

(d) Concerning the reasonable duration for a traineeship, EFEE thinks a six month maximum may be too short and would prefer twelve months, with flexibility for the parties to extend by mutual agreement. We agree that traineeships should not be used to substitute for regular employees, except on an *ad hoc* basis for instance to cover short-term absences of a regular employee in a small organisation.

(e) The question of adequate social protection and remuneration is the most difficult one raised by the consultation. It is important to avoid disincentivising employers by making the conditions of traineeships too demanding; equally, it is important to avoid exploiting trainees. EFEE suggests that the conditions of traineeships that are accepted by the EU for the purpose of subsidy should, at the very least, involve (i) a daily allowance for each day of work, designed to make a contribution to the trainee's living expenses, and in particular those arising from work such as travel and midday meals and (ii) payment of social security dues for the trainee, particularly those covering accident and ill-health insurance. The daily allowance should be fixed nationally by member states in the light of national conditions and should take the form of the same daily payment for all in a particular country, eg 20 euros a day. [The sharing of these costs in a scheme part-subsidised by the EU could, as an illustration, be as follows: social security costs to be met by the member state; daily allowance - for the first six months to be met two-thirds by the EU (subject to the daily allowance not exceeding EU limits) and one-third by the employer; in the next six months, one-third by the EU and two-thirds by the employer; thereafter entirely by the employer. It needs to be remembered in this that the employer will incur indirect costs in terms of supervising and training, and these need to be seen alongside any direct benefits to the employer from the trainee's activities.]

(f) The need for transparency of information on rights and obligations should be met by the traineeship agreement, referred to at (a) above.

5. *What further elements are suggested?*

While it is important to avoid overloading a European initiative in this field with too much detail, it may be useful to stipulate that trainees are not employees or workers and consequently are not covered by, for example, national legislation on minimum wages; however a statement that trainees should be treated as though they were legally entitled to health and safety and working time protection may be considered to be reasonable and fair.

6. *Any other comments.*

(a) EFEE's suggestion that there should be an EU-wide programme for the subsidising of traineeships for up to a year for **all** who leave full-time education and are unable to find employment is undoubtedly ambitious. It would involve the deployment of very large sums of public money. Such a programme would obviously need the whole-hearted support of all member states, not least because if the demand for traineeships is greater than the supply by private employers, member states would have to cover the gap by offering traineeships within the public sector. The scale of the youth unemployment crisis however justifies such an ambitious programme.

(b) It would be for each member state to decide whether the traineeship programme would be compulsory for those who have recently left full-time education but have not found employment.

(c) Finally, social partners at European and national level should be involved in the next stages of policy development; and in particular in drafting any European templates for traineeship agreements and final certificates, as well as any further work in relation to a European scheme for subsidising and supporting high quality traineeship programmes across Europe. As the organisation, which represents employers in education, EFEE considers that it has particular value to add in policy discussions concerning strengthening the links between education and the labour market, as exemplified by traineeships.

Yours sincerely,



Bianka Stege

General Secretary EFEE