Opinion of the Committee of the Regions — The Quality Framework for Traineeships

(2014/C 174/07)

Rapporteur	Andrius KUPČINSKAS (LT/EPP), Mayor of Kaunas
Reference document	Proposal for a Council Recommendation on a Quality Framework for Traineeships COM(2013) 857 final

I. POLICY RECOMMENDATIONS

THE COMMITTEE OF THE REGIONS

1. **welcomes** the recommendation adopted by the Council of the European Union for a Quality Framework for Traineeships (QFT), the establishment of which has been called for in previous opinions, but deeply regrets that the Commission has chosen to present this Framework in the form of a Council Recommendation rather than a Directive;

2. **notes** with concern — given that there was too little time between the presentation of the Commission proposal (4 December 2013) and the adoption of the Council recommendation (10 March 2014) for the Committee of the Regions to issue an opinion in line with the usual procedures — that neither the European Commission while drawing up the recommendation for a Quality Framework for Traineeships, nor the Council before adopting it, consulted the EU's assembly of regional and local representatives, the Committee of the Regions;

3. **regrets** that youth unemployment is still very high in the EU, particularly in some regions, and **stresses** the importance of active steps to combat it. If the target set in the Europe 2020 Strategy of achieving an employment rate of 75% of the 20 to 64 age group by 2020 is to be achieved, youth education must be improved, i.e. better targeted to the needs of the labour market, and more favourable conditions created for the transition to the labour market;

4. **believes** that it is imperative that more be done at both national and European level to encourage young people to aspire to the professions of the future. To this end, studies should be drawn up that make it possible to recognise and influence trends at an early stage, as well as to predict changes in demand for labour by sector and profession, the number of workers requiring training for specific professions and emerging jobs, and the likely need for training places aimed at young people;

5. as traineeships are an essential part of the Youth Guarantee, **reiterates** its support for the Council Recommendation on establishing a Youth Guarantee ([1]) of 22 April 2013 ([2]), which aims to ensure that '*all young people under the age of 25 years receive a good-quality offer of employment, continued education, an apprenticeship or a traineeship within four months of becoming unemployed or leaving formal education*'. Local and regional authorities should play a fundamental role in implementing youth guarantee schemes;

6. **welcomes** the QFT as a useful measure which seeks to ensure that traineeships efficiently ease education-to-work transitions and thus increase young people's employability;

7. considers that the transmission of expertise from one generation to the next, the 'master-apprentice' model, should be given positive emphasis in traineeships;

8. **endorses** the innovations listed in the QFT, as the aim of the QFT is to ensure that traineeships are transparent and to focus on learning objectives; at the same time, is **disappointed** that the Quality Framework does not provide for any discussion of recommendations to the Member States on such important issues as social security or remuneration of trainees; regrets that the remits of the QFT do not match the ones of the Youth Guarantee as the QFT only covers open market traineeships and excludes traineeships undertaken in the framework of a course of study, formal education or vocational training;

([1]) COM(2012) 729 final of 5.12.2012.
([2]) Council Recommendation on Establishing a Youth Guarantee. 2013/C 120/01, 22 April 2013.

9. **points out** that the local and regional authorities play an important part in drawing up and implementing measures to combat unemployment, including in the areas of education and training. The Member States should be aware of this role and make use of the related opportunities to facilitate the process of moving from education into employment for skilled young workers, as local authorities in particular have a role as service providers in the areas of education, training and employment; **regrets**, therefore, that the Council recommendation fails to address the role of local and regional authorities in implementing the QFT;

10. **calls on** the Member States to provide for the active involvement of the social partners and of local and regional authorities in order to ensure that the system is successfully implemented;

11. and to examine thoroughly under what legal and other conditions the QFT could be made a national practice and/or implemented in national law;

Introductory remarks

12. **expresses its concern** about high youth unemployment in the European Union and the resultant current danger of youth poverty, which is also referred to in the European Commission's 2012 Annual Report on Employment and Social Developments ([3]);

13. **stresses** the importance of effective measures to solve the increasing problem in Europe of young people who are neither in work nor in training and **points to** the social, economic and demographic consequences and dangers of these young people's lack of independence;

14. **agrees** with the Commission on the importance of traineeships and **points out** that good-quality traineeships offer young people the opportunity to obtain valuable vocational experience, knowledge and skills and in this way to improve their chances of finding a job and establishing themselves on the labour market quickly and in a lasting way;

15. **shares** the Commission's **concern** that traineeships are sometimes abused as a way of obtaining cheap or even unpaid labour. Thus, the basic challenges are to set an upper time limit for traineeships and to improve their quality, so that they provide useful experience for getting onto the labour market;

16. **points out** that the best results with youth employment can be seen in countries and regions where young people have the opportunity to undertake good-quality traineeships or apprenticeships and where established traineeship and work placement schemes are an inseparable part of the education and employment system; it is important for education institutions to collaborate with the entrepreneurial sphere to ensure the mutual benefits of a traineeship programme are realised;

General aspects of the recommendation

17. **endorses** the basic approach of the QFT and notes that the learning process, which makes it possible to become familiar with the workplace, clear learning objectives and the selection of a suitable supervisor are all important for traineeships;

18. **supports** the QFT's call for traineeship providers to certify through a certificate of completion of the traineeship the knowledge, skills and competences acquired during traineeships; this is essential to ensure that the value of the traineeship is formally recognised as an instrument that helps young people enter the labour market and find good-quality employment;

19. **regrets** that the Council recommendation does not refer to traineeships undertaken as part of a course of study, formal education or vocational training; therefore **calls on** the Commission to put forward a separate proposal for a quality framework for these traineeships;

20. **endorses** the support, provided for under the QFT, for Member State measures from the EU funding framework (financing of traineeship programmes from the resources of the European Social Fund (ESF), the European Regional Development Fund (ERDF) and the Youth Employment Initiative), and through the exchange of good practices and monitoring; nevertheless urges that care be taken to ensure that European funding does not replace private funding;

([3]) Employment and Social Developments in Europe 2012.

Working conditions and transparency

21. in order to guarantee the quality of traineeships, **calls for** greater use of the Open Method of Coordination to promote the discussion of sharing best practice in Europe so as to help the Member State formulate minimum requirements for traineeships based on such practices;

22. **welcomes** the reference in the QFT to the transparency requirements for vacancy notices or announcements advertising traineeship positions, but points out that, despite its importance, transparency alone is not sufficient to ensure the quality of traineeships;

23. **regrets** in this connection that the QFT does not recommend that traineeship providers guarantee appropriate social and health insurance, but merely calls on them to indicate in traineeship announcements whether provision is made for such insurance;

24. **welcomes** the position set out in the QFT that traineeship vacancy notices should indicate whether remuneration and/or compensation for the traineeship is provided and welcomes the Council's recommendation that vacancy notices or announcements should indicate the level of any remuneration or compensation. At the same time, the Committee considers that it must be ensured that this duty to inform does not become a bureaucratic burden for traineeship providers and that any regulation in this area promotes rather than hinders the creation of traineeships in all sectors of the labour market;

25. **points out** that the QFT does not address the question of unpaid or only partly paid traineeships. The results of a recent Eurobarometer survey ([4]) show that three fifths of all trainees receive no compensation, or else so little that in more than half the cases it is insufficient to cover basic living costs. This carries the risk of access to traineeships being restricted to those who can afford it, which in turn will mean a decline in the number of traineeships and in their economic usefulness, as well as growing inequality;

26. The plan to guarantee the quality of traineeships by requiring the establishment of conditions for appropriate insurance and compensation or remuneration for all trainees could, in view of the heavy financial burden which this would place both on local and regional authorities and firms, lead to a reduction in the number of traineeship places. Since diversity within Europe may make it impossible to develop a suitable uniform model for all, the CoR **welcomes** the efforts to establish effective systems for the partial or full financing of traineeships from a combination of different sources;

27. **notes** that the Council recommendation does not adequately define the role of the trainee's supervisor, and therefore, while being aware that regulation of the matter ultimately falls under the competence of the Member States, **calls on** the Member States and social and economic partners to exchange best practices for regulating the role of the trainee's supervisors, their duties and responsibilities as well as other relevant issues, so as to develop a gradual understanding of what European best practice is and put the principle of multi-level governance into practice;

Transnational traineeships

28. **welcomes** the positive influence of the QFT, which facilitates transnational traineeships, which are still too rare, and improves access to information;

29. given article 153 TFEU as the legal basis for the QFT foresees that the European Union supports and complements the action of the Member States, suggests that EU-wide efforts should be made to gather and disseminate information about the rules on traineeships in order to promote the mobility of trainees, because it will be easier for young people to undertake a traineeship in another country if they have ready access to information about what trainees can expect;

30. **points out**, however, that the fact that there is often no compensation for expenses, or that this is insufficient and is compounded by a failure to provide accommodation, can be a barrier to transnational traineeships, because potential trainees are often unable to undertake a traineeship in another Member State because of the difficult financial situation;

31. **stresses** that the creation of more favourable conditions for transnational traineeships could have a number of positive effects, for instance increasing trainees' chances of employment and improving integration into the labour market;

([4]) Eurobarometer: 'The experience of a Traineeship in the EU', 2013.

32. **welcomes** the view expressed in the QFT that EURES could be extended to traineeships, as called for by the European Council in its conclusions ([5]) of June 2012, and **welcomes** the proposal to use the network for the exchange of information on traineeships;

33. **endorses** the use of EURES to ensure access to information on vacant traineeships and **recommends** that it also be used as a feedback instrument, enabling trainees to assess their experience with traineeships;

34. **points out** that the number of transnational traineeships is very low, despite high mobility rates among students, e. g. in the Erasmus programme ([6]). This is a missed opportunity to reduce youth unemployment through mobility: transnational traineeships could be a key factor in helping young people take up employment in another Member State; therefore **welcomes** the launch of the Erasmus+ programme, which could help to increase the number of traineeships abroad;

35. the opportunity to obtain experience under different conditions offers young people an invaluable chance to increase the number of potential employers in the various Member States. Ways to ensure the effectiveness of support for traineeships in another Member State **should** therefore **be sought**: by looking for ways of cushioning trainees' expenses for moving to another country and providing appropriate information to ensure that trainees do not suffer financial hardship, taking account of the cost of living in the country in which the traineeship takes place and the administrative regulations applicable in the host country (work and residence permit, registration where applicable, etc.);

Implementation of the QFT

36. **points out** that the local and regional authorities should be involved in the comprehensive drafting and implementation of new initiatives, giving them the funds they need to implement them, as they are best placed to assess the different conditions and needs at local level;

37. **regrets** that the Council recommendation does not propose that local and regional authorities and firms be consulted more fully on the establishment and fine tuning of educational programmes to take into account the needs of the labour market and train specialists in vocations where there is a demand;

38. also **points out** that the local and regional authorities are often largely responsible for the implementation of employment and general and vocational education measures and that the regional aspect of these policy areas is very important;

39. **welcomes** the fact that 'the active involvement of employment services, educational institutions and training providers in implementing the Quality Framework for Traineeships' is to be promoted and stresses the important role of the local and regional authorities in all three areas;

40. **stresses** that the local and regional authorities must be involved in the successful implementation of the QFT in their capacity as employers and **regrets** that the Commission recommendation contains no specific reference to their responsibilities and experience; considers it important to establish a legal framework enabling public institutions to receive trainees and to disseminate best practices of public authorities;

41. calls on the Commission to take further action to collect and disseminate information and to encourage the Member States to complete their legislation so as to ensure that the conditions of traineeships meet the expectations of all those involved even more closely;

42. **points out** that the local and regional authorities, as major employers and traineeship providers, should set a good example with the implementation of rules for high-quality traineeships; calls therefore on the local and regional authorities to provide as many high-quality traineeship places as possible;

43. **stresses** how important it is for active civil society stakeholders, particularly young people and youth organisations, to be able to get involved in the implementation phase of the QFT, inter alia through the European Alliance for Apprenticeships, a cooperation platform which the Commission set up in July 2013;

([5]) http://www.consilium.europa.eu/uedocs/cms_data/docs/pressdata/en/ec/131388.pdf.

([6]) The 2013 Eurobarometer survey found that only 9 % of traineeships took place abroad.

44. also **stresses** the importance of private industry, and above all SMEs, for the successful implementation of the QFT;

45. **calls on** local and regional authorities, when establishing programmes to improve students' skills, to work together more closely with local training institutions and employers, and establish grants and offer paid traineeships for the best students; also **points out** the importance of disseminating across the EU best practice developed in individual Member States;

Final provisions

46. **welcomes** the Commission recommendations for the promotion of close cooperation with stakeholders in order to ensure rapid implementation of the QFT and again **points to** the important role of the local and regional authorities in this area;

47. **calls on** the Member States to follow the Commission recommendation and, when implementing the QFT, to test and improve its effectiveness in achieving the objectives pursued by national youth employment policies.

II. **RECOMMENDATIONS FOR AMENDMENTS**

Amendment 1

Recital 1

Text proposed by the Commission	CoR amendment
Young people have been hit particularly hard during the crisis. Youth unemployment rates have reached historical peaks in the past years in several Member States, without any sign of decrease in the short term. Fostering the employability and productivity of young people is key to bringing them onto the labour market.	Young people have been hit particularly hard during the crisis. Youth unemployment rates have reached historical peaks in the past years in several Member States, without any sign of decrease in the short term. The extremely wide variation in unemployment rates between regions is undermining the European Union's social and territorial cohesion objectives. Fostering the employability and productivity of young people is key to bringing them onto the labour market.

Amendment 2

Recital 16

Text proposed by the Commission	CoR amendment
Member States' programmes promoting and offering traineeships to young people can be financially supported by the European Funds. In addition, the Youth Employment Initiative will support traineeships in the context of the Youth Guarantee, targeting young people from the Union's regions worst affected by youth unemployment and which will be co-financed by the European Social Fund (ESF) 2014-20. 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.	Member States' programmes promoting and offering traineeships to young people can be financially supported by the European Funds. In addition, the Youth Employment Initiative will support traineeships in the context of the Youth Guarantee, targeting young people from the Union's regions worst affected by youth unemployment and which will be co-financed by the European Social Fund (ESF) 2014-20. 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, whilst taking the necessary precautions to ensure that this public funding does not replace private funding. In addition, they can also support the costs of other trainings that young people may pursue outside their traineeship, e.g. language courses.

Amendment 3

Recital 29

Text proposed by the Commission	CoR amendment
This Recommendation does not cover work experience placements that are part of academic curricula, of formal education or vocational course. Traineeships the content of which is regulated under national law and whose completion is a requirement to obtain a university degree or to access a specific profession (e.g. medicine, architecture, etc.) are not covered by this Recommendation.	This Recommendation does not cover work experience placements that are part of academic curricula, of formal education or vocational course. Traineeships the content of which is regulated under national law and whose completion is a requirement to obtain a university degree or to access a specific profession (e.g. medicine, architecture, etc.) are not covered by this Recommendation.; this second type of traineeship will be covered by a separate Commission proposal.

Amendment 4

Recommendation 5

Text proposed by the Commission	CoR amendment
Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, and monitoring his/her progress;	~~**Encourage**~~ **Stipulate** that traineeship providers are to~~to~~ designate a supervisor for trainees guiding the trainee through the assigned tasks, and monitoring his/her progress;

Amendment 5

Recommendation 13

Text proposed by the Commission	CoR amendment
Proper recognition of traineeships (13) **Encourage** traineeship providers to certify through a certificate or a letter of reference the knowledge, skills and competences acquired during traineeships;	**Proper recognition of traineeships** (13) ~~**Encourage**~~ **Require** traineeship providers to certify through a certificate or a letter of reference the knowledge, skills and competences acquired during traineeships;

Amendment 6

Recommendation 25

Text proposed by the Commission	CoR amendment
Work with Member States, social partners, employment services, and youth and trainee organisations to promote this Recommendation;	Work with Member States, social partners, employment services, ~~and~~ youth and trainee organisations and local and regional authorities to promote this Recommendation;

Amendment 7

Recommendation 26

Text proposed by the Commission	CoR amendment
Encourage and support Member States, including through promoting the exchange of best practices among them, to make use of the European Social Fund and the European Regional Development Fund or other European Funds for the 2014-2020 programming period to increase the number and quality of traineeships;	Encourage and support Member States and local and regional authorities, including through promoting the exchange of best practices among them, to make use of the European Social Fund and the European Regional Development Fund or other European Funds for the 2014-2020 programming period to increase the number and quality of traineeships;

Amendment 8

New recommendation after recommendation 28

Text proposed by the Commission	CoR amendment
	Propose at a later stage a quality framework covering traineeships undertaken as part of a course of study, formal education or vocational training;

Brussels, 3 April 2014

The President
of the Committee of the Regions

Ramón Luis VALCÁRCEL SISO