



Study supporting the evaluation of the Quality Framework for Traineeships

Final report

VC/2021/0654



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STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

EUROPEAN COMMISSION

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Executive summary

The overall purpose of this study is to support the European Commission in its 2022 evaluation of the 2014 Council Recommendation on a Quality Framework for Traineeships (QFT)¹. Eight years on from the introduction of the QFT, the evaluation provides an opportunity to assess the impact of its implementation and explore whether any adaptations or adjustments are required. The review of the QFT was defined as an action in the European Pillar of Social Rights Action Plan², adopted at the Porto Summit in March 2021.

The study supporting the evaluation aims specifically to: establish what works and what does not work (and why) in terms of adequate QFT implementation; describe the current situation in terms of traineeships across the EU and the main developments since 2014; assess the extent to which the 2014 Council Recommendation on the QFT is effective, efficient, coherent, brings EU added value and is relevant to current needs.

The scope of the evaluation is the EU in its present composition of 27 Member States. The time span covered is the period from Q4 2014 to Q4 2021. The study focuses on open market traineeships (OMTs) and those that fall under Active Labour Market Policies (ALMPs), thereby excluding (1) work experience placements that are part of curricula of formal education or vocational education and training; and (2) traineeships regulated under national law and whose completion is a mandatory requirement to access a specific profession (e.g., medicine, architecture, etc.).

Methodology

Our methodological approach to the study combined a series of research and analytical tasks to gather robust evidence to deliver informed findings, conclusions and lessons learnt, and was fully aligned with the Better Regulation Guidelines. It included: (1) targeted consultations (interviews with key stakeholders at EU and national level, survey of trainees, expert meeting, validation workshop); (2) mapping of the situation in each of the 27 EU Member States since 2014 as regards traineeship quality and QFT implementation; (3) seven Member State case studies (AT, BG, EL, ES, IE, IT, LT) for in-depth assessment; (4) support for the implementation and analysis of the results of the Commission's public consultation; and (5) analysis and reporting.

Key limitations to the study included a lack of existing solid secondary evidence on traineeship prevalence, quality and impact, the diversity in regulatory approaches across Member States, the diversity of stakeholders involved in implementing traineeships, the existence of limited quantifiable evidence on costs and benefits of implementing the QFT, as well as a low level of awareness of the QFT among stakeholders.

¹ [https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327\(01\)](https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327(01))

² https://ec.europa.eu/info/strategy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights/european-pillar-social-rights-action-plan_en

To what extent was the intervention successful?

Effectiveness

The principles of the QFT have been enshrined to a moderate degree in national legislation/frameworks for traineeships, with key differences across Member States and between types of traineeships. 14 Member States have reformed or introduced legislation/policy to implement the QFT in their legislation/ policy frameworks since its adoption. Efforts to implement the QFT are more evident in national legislation governing ALMP traineeships, with 18 Member States fully/mostly implementing the QFT principles in national legislation/policy for ALMP traineeships, compared to seven Member States for open market traineeships. The objective of the Recommendation to ensure more coherent regulatory approaches across Member States has thus been achieved to a limited degree, particularly for open market traineeships, as regulatory approaches have not significantly converged since the QFT was adopted.

Even when national legislation shows high implementation of the QFT, this does not always translate to quality traineeships on the ground. Monitoring and enforcement mechanisms exist for both types of traineeships in all Member States; however, they remain more common for ALMP traineeships than for open market traineeships and, even where they do exist on paper, our evidence indicates that they have limited impact in ensuring application of the legal framework.

One of the objectives of the QFT was to increase the uptake of cross-border traineeships in the EU. This study found some indications that cross-border traineeships have become slightly more common, but it is also clear that the barriers to accessing them are still in place. These stem in part from the diverse regulatory landscape on traineeships across the EU. This is coupled with a lack of resources and information to traineeship providers on how they can hire a young person from abroad, and to young people on how they can access opportunities in other EU countries.

It is not possible to ascertain the specific impact of the implementation of the QFT on trainees due to the multiple factors which influence trainees' experiences and outcomes, but evidence shows that there have been improvements in the quality of traineeships since 2014 and that quality traineeships do have a positive impact on young people in terms of facilitating a stable labour market integration and contributing to youth employment. However, the study has also revealed the existence of inequalities in terms of access to opportunities to undertake traineeships. Young people from rural areas, from a lower socio-economic background and with lower educational attainment were identified as groups that may have fewer opportunities to complete traineeships. Some sectors also emerged from the data as being more prone to low quality traineeships, including arts, entertainment and recreation, health and social work, and education. Furthermore, sectors with a larger share of small enterprises were more likely not to apply the QFT in their traineeships due primarily to the perceived administrative burden.

Efficiency

As far as benefits are concerned, the study shows that young people have seen improvements in the quality of traineeships through trainees being less exploited and gaining learning and skills which increase their chances of entering work. For employers, key benefits of applying QFT principles are that: they enhance employer understanding of traineeship quality; they enhance employer reputation and increase their attractiveness to young workers; they allow employers to provide young workers with work experience, without paying a full wage, while investing in those individuals; and they enable employers to effectively 'try out' workers. There are also benefits to society from reduced unemployment and improved school-to-work transition.

Looking at costs, employers reported adjustment costs linked to supervising trainees, assessing and certifying trainees' skills, and developing training plans. In cases where these costs are subsidised or reimbursed, applying for and managing the subsidies involves administrative costs, especially for small companies. The dominant view was that QFT-related costs for employers were small, overall. However, costs are likely to be more significant for small organisations with fewer

resources to devote to understanding traineeship requirements and supervising trainees; and higher for open market traineeships than for ALMP traineeships given that the latter offer many more financial instruments and financial support for employers, limiting the costs they must bear.

Adjustment costs for national authorities include direct labour costs associated with designing programmes, implementing new legislation, and investing in public services and labour inspectorates to monitor compliance; while ongoing costs include the costs of subsidies and grants to support traineeships.

The obstacles to employers of offering traineeships centre around regulatory and administrative complexities in offering traineeships. Employers highlighted the complexity of existing legal frameworks on open market traineeships, and administrative challenges of managing cooperation with PES and financial incentives (for ALMP traineeships). Challenges around a lack of capacity to apply the learning elements to the traineeship were also cited as common obstacles across both types of traineeships.

Overall, the research evidence suggests that administrative burdens of QFT implementation are generally proportionate to the benefits. A key reason is that total costs associated with the QFT are low, whereas benefits, especially potential future benefits, are potentially large. The proportionality of costs to benefits, and therefore efficiency, do however vary with several factors: efficiency is achieved only if the QFT promotes higher quality traineeships; QFT implementation is less efficient for small and micro organisations than for large firms; efficiency is greater if employers are incentivised to offer a job to a young person following a traineeship. The evidence also implies that it would be difficult to reduce the overall administrative burden associated with QFT without also reducing the scale of the benefits.

Coherence

There is overall a fairly good level of coherence and complementarity between the objectives, target groups and measures to implement the QFT and relevant policies at national and regional level in the fields of education and training, employment, and social policy. However, the degree of coherence varies both across EU countries and by policy field. There is more evidence of coherence with national and regional measures within the context of ALMPs than with open market traineeships. Overall, the greatest degree of coherence can be found with national and regional policies in the field of employment, compared to the policy fields of education, training and social policy.

The objectives, target groups and measures to implement the QFT, both in the context of ALMPs and open market traineeships, display overall a good level of coherence with other relevant EU initiatives, funds and programmes. No evidence of overlap or duplication was found. The QFT is coherent with relevant overarching EU strategies, EU youth policies, EU initiatives on traineeships and apprenticeships, and EU employment policies. It is also coherent with key EU funding mechanisms including the Youth Employment Initiative (YEI), the ESF+, NextGenerationEU and Erasmus+.

How did the EU intervention make a difference?

EU added value

The QFT has added value to the national and regional situation in relation to traineeships in many Member States. However, the extent of the EU added value varies in accordance with factors such as whether instruments and measures were already in place, and the extent to which they have been improved since the adoption of the QFT. Most specifically, the QFT provides an EU-level structure and framework for national-level action in Member States and can also serve to lend weight to the arguments of national stakeholders. Further, some of the newer Member States have

particularly appreciated the existence of the QFT as a guiding instrument for new policy formulation.

Views on the consequences of discontinuing the QFT at EU level and the prognosis for a no-policy-change scenario tend to fall into two groups. Some stakeholders consider that discontinuing the QFT or continuing it as it stands would have no impact because its principles are now embedded in national legislation. However, the majority of views indicate clearly that the QFT should remain in place. There were also a range of stakeholders that called for strengthening the current QFT in various ways. These included introducing supporting actions such as mutual learning and exchange or more substantial changes including additional principles to increase its added value.

Is the intervention still relevant?

Relevance

The study shows that the QFT is highly relevant for fostering the labour market integration of young people, with the provision of a written agreement and the focus on the learning objectives of the traineeship standing out as the most relevant principles to achieve positive post-traineeship outcomes.

The QFT overall remains relevant as issues such as high youth unemployment and NEET rates, substandard traineeships and complex legal frameworks persist. The impact of the pandemic on the labour market has increased the relevance of the QFT whilst also bringing about a need to consider adjustments to the QFT to ensure its continued relevance given the increasingly central role of remote working and digital skills.

Views on the relevance of the non-binding nature of the QFT are more mixed and tend to align along stakeholder groups. Trade unions and youth organisations generally find that the non-binding nature of the QFT is not relevant for achieving its objectives, whereas national authorities and employer organisations believe that the QFT's non-binding nature is highly relevant as it takes into account the diversity of national education and training and labour market environments and strikes a balance between the need to ensure minimum standards and preserve a degree of flexibility. The evidence from the study is also mixed on whether additional principles on remuneration and access to social protection for trainees would increase the relevance of the QFT, once again aligned along stakeholder groups. On the one hand, trade unions and youth organisations call for increasing the relevance of the QFT through principles on remuneration and social protection access. On the other hand, employer representatives express reservations on the relevance of such principles, highlighting that trainees should not be defined as workers with the same rights to remuneration and social protection as doing so would take away from the main purpose of traineeships to provide a learning opportunity.

Lessons learnt

Based on the findings from the study, we set out below some lessons learnt for the future, structured by category.

Scope of traineeships covered by the QFT

- The QFT, and any future quality standards for traineeships, should define in more detail the scope of traineeships which are covered to ensure greater clarity for all stakeholders.
- On balance, the research indicates that the current scope of the QFT – covering ALMP traineeships and OMTs – is fit for purpose.

Content of the QFT, including QFT principles

- The formulation of recommendations and principles in the current QFT could be more direct to increase their effectiveness and implementation, especially on core principles (e.g., establishing learning objectives).
- Additional principles ensuring the remuneration of trainees and their access to social protection should be considered. This would support in making traineeships a more accessible opportunity for all young people and would address the concerns of key stakeholder groups with the QFT - centred around the potential exploitation of trainees - in particular young people themselves and their representatives and trade unions.
- However, in order to respect the concerns of other key stakeholders - in particular employer representatives - and ensure that traineeships remain an attractive option to employers, it will be crucial that there is ongoing constructive dialogue with employers about the level of remuneration, and a degree of flexibility built into trainee remuneration.
- There is a need to integrate a much greater and more explicit equality perspective into the design and implementation of the QFT to ensure that it provides quality traineeships for young people from all backgrounds.
- Future quality frameworks for traineeships need to clearly address recent and emerging trends which are already having a major impact on the nature of traineeships and the workplace in general. These include the impact of the Covid-19 pandemic, new forms of working, learning and employment, as well as the digital and green transitions.
- Where possible, greater harmonisation between the quality criteria in the EFQEA³ and the QFT could mutually reinforce both quality frameworks.

Boosting implementation at national/regional level

- The study clearly shows that particular attention needs to be paid overall to implementation on the ground of the QFT principles, which is lagging behind implementation of the QFT in national legislation/frameworks.
- Given current skills mismatches, ensuring more links with the skills needs of local labour markets can help to increase the quality and relevance of traineeships and is a win-win for both traineeship providers and trainees.
- More tailoring of provision, outreach and targeted support for employers and young people would contribute to allowing young people in all their diversity to have access to quality traineeships.
- There should be more awareness-raising and training for employers, including SMEs, about the benefits of traineeships, including addressing skills shortages, how quality traineeship schemes can be developed, and the funding available to support the costs involved.
- There are still obstacles to cross-border traineeships, in part because regulatory approaches to open market traineeships have not converged since the QFT was adopted. Clear guidance to traineeship providers on the regulations in place in different countries and how to hire trainees from other countries would be beneficial.

³ European Framework for Quality and Effective Apprenticeships, see <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018H0502%2801%29>

Enforcement, monitoring and evaluation of traineeships and QFT implementation

- There is a clear need for more comparable EU wide data on traineeships and trainees in general, as this lack of data currently hampers the monitoring of their evolution and of the impact of the QFT.
- Reinforcement of monitoring and enforcement mechanisms at national and regional level would have a strong positive impact on compliance with quality standards in traineeships.

Cooperation and mutual learning to support QFT implementation

- Further mechanisms could be implemented at EU level to bring key national stakeholders together to oversee, monitor and seek to overcome obstacles to the successful implementation on the ground of the QFT.
- The implementation of the QFT could benefit from the support of a network of committed stakeholders across the EU, as is the case for the support provided by the European Alliance for Apprenticeships (EAfA) for the implementation of the EFQEA.
- More EU level mutual learning, including sharing of examples of good practice around developing and implementing quality traineeships, could help inspire both national policymakers and other key stakeholders, which in turn could increase compliance and improve the provision of quality traineeships.
- Increased cooperation between all key stakeholders involved in traineeships at national, regional and also local level can also play a key role in improving monitoring and supporting implementation. The voice of trainees should be actively sought, as well as the involvement of NGOs and bodies representing young people.

Funding to support the implementation of quality traineeships and the QFT

- More signposting should be provided for national and regional stakeholders on the EU funds available to support the implementation of quality traineeships.
- A range of financial incentives can be offered to support employers in the implementation of quality traineeships, which have been shown to be particularly beneficial for small and medium sized enterprises (SMEs).

Further research

- Further research should be carried out on the obstacles to employers to offering quality traineeships, as well as the barriers preventing young people from taking up traineeships.
- Differences in the rights and conditions of traineeships across different sectors should be further explored and addressed to ensure equity for all trainees.
- Research on the impact of the Covid-19 pandemic on the quality of traineeships and the evolution of means of traineeships (e.g., digital traineeships) would allow better tailoring of future quality standards and adaptation to needs both currently and in the future.

Synthèse

L'objectif général de la présente étude est d'aider la Commission européenne dans son évaluation 2022 de la recommandation du Conseil de 2014 relative à un cadre de qualité pour les stages ⁴. Huit ans après l'introduction du cadre de qualité pour les stages, cette évaluation offre l'occasion de faire le point sur l'incidence de son application et d'examiner l'éventuelle nécessité d'y apporter des adaptations ou des ajustements. Le réexamen du cadre de qualité pour les stages figure parmi les actions définies dans le Plan d'action sur le socle européen des droits sociaux ⁵, adopté au sommet de Porto en mars 2021.

L'étude à l'appui de l'évaluation vise plus particulièrement à : établir ce qui fonctionne et ce qui ne fonctionne pas (et pourquoi) pour ce qui est de l'application adéquate du cadre de qualité pour les stages; décrire la situation actuelle en matière de stages dans l'UE et les principales évolutions depuis 2014; évaluer dans quelle mesure la recommandation du Conseil de 2014 relative au cadre de qualité pour les stages est efficace, efficiente et cohérente, apporte une valeur ajoutée à l'UE et répond aux besoins actuels.

L'évaluation porte sur l'UE dans sa composition actuelle, c'est-à-dire à 27 États membres. La période couverte va du 4^e trimestre 2014 au 4^e trimestre 2021. L'étude se concentre sur les stages sur le marché libre et sur ceux qui relèvent des politiques actives du marché du travail (PAMT), excluant ainsi (1) les stages qui font partie de programmes d'enseignement formel ou d'éducation et de formation professionnelles; et (2) les stages couverts par le droit national et qui doivent obligatoirement être effectués pour accéder à une profession spécifique (par exemple, médecine, architecture, etc.).

Méthodologie

Pour mener à bien l'étude, notre démarche méthodologique, pleinement conforme aux lignes directrices pour une meilleure réglementation, a consisté à combiner une série de tâches de recherche et d'analyse en vue de rassembler des éléments probants solides qui permettent de présenter des résultats, des conclusions et des enseignements étayés. Elle a englobé : 1) des consultations ciblées (entretiens avec les principales parties prenantes au niveau de l'UE et au niveau national, enquête auprès de stagiaires, réunion d'experts, atelier de validation); 2) une cartographie de la situation dans chacun des 27 États membres de l'UE depuis 2014 en ce qui concerne la qualité des stages et l'application du cadre de qualité pour les stages; 3) sept études de cas d'États membres (AT, BG, EL, ES, IE, IT, LT) pour une évaluation approfondie; 4) une aide pour l'application et l'analyse des résultats de la consultation publique de la Commission; et 5) un travail d'analyse et de production de rapport.

Les principales limites de l'étude sont le manque d'éléments probants secondaires solides sur la prévalence, la qualité et l'incidence des stages, la diversité des approches réglementaires entre les États membres, la diversité des parties prenantes impliquées dans la mise en œuvre des stages, l'existence de données quantifiables limitées sur les coûts et les bénéfices de l'application du

⁴ <https://eur-lex.europa.eu/legal-content/FR/ALL/?uri=CELEX%3A32014H0327%2801%29>

⁵ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights/european-pillar-social-rights-action-plan_fr

cadre de qualité pour les stages, ainsi que la relative méconnaissance du cadre de qualité pour les stages parmi les parties prenantes.

Dans quelle mesure l'intervention a-t-elle été réussie?

Efficacité

Les principes du cadre de qualité pour les stages ont été partiellement inscrits dans les législations/cadres nationaux relatifs aux stages, avec des différences importantes selon les États membres et selon les types de stages. Depuis son adoption, 14 États membres ont modifié une politique/un texte législatif existant ou en ont introduit un nouveau afin d'appliquer le cadre de qualité dans leur législation/politique. Il est davantage intégré aux législations nationales régissant les stages PAMT: 18 États membres appliquent entièrement/majoritairement ses principes dans leur législation/politique nationale relative aux stages PAMT, mais ils ne sont que 7 dans le cas des stages sur le marché libre. L'objectif de la recommandation de garantir des approches réglementaires plus cohérentes entre les États membres n'a donc été que partiellement atteint, notamment pour les stages sur le marché libre, car ces approches n'ont pas convergé de manière significative depuis l'adoption du cadre de qualité pour les stages.

Même lorsque le cadre de qualité pour les stages a été majoritairement intégré à la législation nationale, cela ne se traduit pas toujours par des stages de qualité sur le terrain. Il existe des mécanismes de suivi et d'exécution pour les deux types de stages dans tous les États membres; toutefois, ces mécanismes restent plus courants pour les stages PAMT que pour les stages sur le marché libre et, même lorsqu'ils existent sur le papier, les éléments dont nous disposons indiquent qu'ils ne garantissent que de manière limitée l'application du cadre juridique.

L'un des objectifs du cadre de qualité pour les stages était d'augmenter le nombre de stages transfrontaliers dans l'UE. Cette étude a constaté que si les stages transfrontaliers sont désormais un peu plus courants, il est également clair que les obstacles à leur accès persistent. Cette situation est due, en partie, à la diversité de l'environnement réglementaire des stages dans l'UE. À cela s'ajoute le manque de ressources et d'informations: aussi bien celles à la disposition des fournisseurs de stages sur la manière dont ils peuvent embaucher un jeune étranger que celles à la disposition des jeunes sur la manière dont ils peuvent accéder aux opportunités existant dans d'autres pays de l'UE.

Il n'est pas possible de déterminer l'incidence spécifique de l'application du cadre de qualité pour les stages sur les stagiaires en raison des multiples facteurs qui influencent les expériences qu'ils vivent et les résultats qu'ils obtiennent, mais les éléments probants montrent que la qualité des stages s'est améliorée depuis 2014 et que les stages de qualité ont effectivement un effet positif sur les jeunes en facilitant leur intégration stable sur le marché du travail et en contribuant à leur emploi. Toutefois, l'étude a également révélé l'existence d'inégalités en matière d'accès aux offres de stage. Les jeunes issus de zones rurales, d'un milieu socio-économique défavorisé et ayant atteint un niveau d'éducation inférieur ont été identifiés comme des groupes susceptibles d'avoir moins de chances d'effectuer un stage. Il ressort également des données que certains secteurs proposent davantage de stages de faible qualité, notamment ceux des arts, du divertissement et des loisirs, de la santé et de l'action sociale, et de l'enseignement. En outre, les secteurs comptant une part plus importante de petites entreprises sont plus susceptibles de ne pas appliquer le cadre de qualité à leurs stages, principalement en raison de la charge administrative perçue.

Efficiences

En ce qui concerne les bénéfices, l'étude montre que les jeunes ont constaté une amélioration de la qualité des stages: les stagiaires sont moins exploités et acquièrent une expérience d'apprentissage et des compétences qui augmentent leurs chances d'entrer dans la vie active. Pour les employeurs, les principaux bénéfices de l'application des principes du cadre de qualité pour les stages sont les suivants: ils renforcent la compréhension qu'ont les employeurs d'un stage

de qualité; ils améliorent la réputation des employeurs et accroissent leur attractivité pour les jeunes travailleurs; ils permettent aux employeurs de fournir aux jeunes travailleurs une expérience professionnelle, sans leur verser un salaire complet, tout en investissant dans ces personnes; et ils donnent aux employeurs la possibilité de «tester» les travailleurs. La société bénéficie également d'une baisse du chômage et d'une meilleure transition entre école et monde du travail.

En ce qui concerne les coûts, les employeurs ont mentionné des coûts d'ajustement liés à la supervision des stagiaires, à l'évaluation et à la certification des compétences des stagiaires, ainsi qu'à l'élaboration de plans de formation. Dans les cas où ces coûts sont subventionnés ou remboursés, la demande et la gestion des subventions impliquent des coûts administratifs, en particulier pour les petites entreprises. L'opinion dominante est que, dans l'ensemble, les coûts liés au cadre de qualité pour les stages à la charge des employeurs sont faibles. Cependant, ces coûts peuvent être plus importants pour les petites entreprises qui ont moins de ressources à consacrer à la compréhension des exigences associées aux stages et à la supervision des stagiaires; et plus élevés pour les stages sur le marché libre que pour les stages PAMT, dans la mesure où ces derniers offrent beaucoup plus d'instruments financiers et de soutien financier aux employeurs, ce qui limite les coûts qu'ils doivent supporter.

Les coûts d'ajustement pour les autorités nationales comprennent les coûts salariaux directs liés à la conception des programmes, à la mise en œuvre de la nouvelle législation et à l'investissement nécessaire dans les services publics et les inspections du travail pour assurer le suivi; quant aux coûts permanents, ils comprennent les coûts des subventions et des aides en soutien aux stages.

Pour les employeurs offrant des stages, les principaux obstacles concernent les complexités réglementaires et administratives. Les employeurs ont souligné la complexité des cadres juridiques existants en matière de stages sur le marché libre, ainsi que les difficultés administratives liées à la gestion de la coopération avec le service public de l'emploi (SPE) et des incitations financières (pour les stages PAMT). Les difficultés associées à un manque de capacité pour appliquer les éléments d'apprentissage au stage ont également été citées comme des obstacles communs aux deux types de stages.

Dans l'ensemble, l'étude suggère que les charges administratives liées à l'application du cadre de qualité pour les stages sont généralement proportionnelles à ses bénéfices. L'une des principales raisons en est que les coûts totaux associés au cadre de qualité pour les stages sont faibles, alors que ses bénéfices, en particulier ses futurs éventuels bénéfices, sont potentiellement importants. La proportionnalité des coûts par rapport aux bénéfices, et donc l'efficacité, varie toutefois en fonction de plusieurs facteurs: l'efficacité n'est atteinte que si le cadre de qualité pour les stages favorise des stages de meilleure qualité; l'application du cadre de qualité pour les stages est moins efficace pour les petites et microentreprises que pour les grandes entreprises; l'efficacité est accrue si les employeurs sont incités à offrir un emploi à un jeune à la suite d'un stage. Les données indiquent également qu'il serait difficile de réduire la charge administrative globale associée au cadre de qualité pour les stages sans réduire l'ampleur des bénéfices.

Cohérence

La cohérence et la complémentarité entre les objectifs, les groupes cibles et les mesures visant à appliquer le cadre de qualité pour les stages et les politiques pertinentes aux niveaux national et régional dans les domaines de l'éducation et de la formation, de l'emploi et de la politique sociale sont, dans l'ensemble, assez bonnes. Toutefois, le degré de cohérence varie à la fois en fonction des pays de l'UE et du domaine d'action. La cohérence avec les mesures nationales et régionales est plus évidente dans le contexte des PAMT que dans celui des stages sur le marché libre. Globalement, la cohérence avec les politiques nationales et régionales est plus importante dans le domaine de l'emploi que dans ceux de l'éducation, de la formation et de la politique sociale.

Les objectifs, les groupes cibles et les mesures d'application du cadre de qualité pour les stages, tant dans le contexte des PAMT que des stages sur le marché libre, présentent globalement un bon niveau de cohérence avec d'autres initiatives, fonds et programmes de l'UE pertinents. Il n'a été trouvé aucun élément probant indiquant un chevauchement ou une duplication. Le cadre de

qualité pour les stages est cohérent avec les stratégies globales de l'UE, les politiques de l'UE en faveur de la jeunesse, les initiatives de l'UE en matière de stages et d'apprentissage, et les politiques de l'UE pour l'emploi. Il est également cohérent avec les principaux mécanismes de financement de l'UE, notamment l'initiative pour l'emploi des jeunes (IEJ), le FSE+, NextGenerationEU et Erasmus+.

En quoi l'intervention de l'UE a-t-elle fait la différence?

Valeur ajoutée pour l'UE

Le cadre de qualité pour les stages a apporté une valeur ajoutée à la situation nationale et régionale en matière de stages dans de nombreux États membres. Toutefois, l'ampleur de la valeur ajoutée pour l'UE varie en fonction de facteurs tels que l'existence préalable de mesures et d'instruments connexes et la mesure dans laquelle ils ont été améliorés depuis l'adoption du cadre de qualité pour les stages. Plus précisément, ce dernier fournit une structure et un cadre au niveau de l'UE pour une action à l'échelon national dans les États membres et peut également servir à donner du poids aux arguments des parties prenantes nationales. En outre, certains des nouveaux États membres ont particulièrement apprécié l'existence du cadre de qualité pour les stages en tant qu'instrument d'orientation pour la formulation de nouvelles politiques.

Les opinions sur les conséquences de l'abandon du cadre de qualité pour les stages au niveau de l'UE et le pronostic d'un scénario de statu quo se répartissent globalement en deux groupes. Certaines parties prenantes considèrent que l'abandon du cadre de qualité pour les stages ou son maintien en l'état n'aurait aucune incidence, car ses principes sont désormais ancrés dans la législation nationale. Toutefois, la majorité pense clairement que le cadre de qualité pour les stages devrait rester en place. Un certain nombre de parties prenantes ont également appelé à renforcer l'actuel cadre de qualité pour les stages de diverses manières. Il s'agirait notamment d'introduire des actions de soutien telles que l'apprentissage et l'échange mutuels ou des changements plus substantiels, y compris des principes supplémentaires pour accroître sa valeur ajoutée.

L'intervention est-elle toujours pertinente?

Pertinence

L'étude montre que le cadre de qualité pour les stages est tout à fait pertinent lorsqu'il s'agit de favoriser l'intégration des jeunes sur le marché du travail, l'existence d'une convention écrite et l'accent mis sur les objectifs d'apprentissage du stage étant les principes les plus pertinents pour l'obtention de résultats positifs après le stage.

Dans l'ensemble, le cadre de qualité pour les stages reste pertinent, car certains problèmes persistent, tels que les taux élevés de NEET et de chômage des jeunes, les stages de moindre qualité et les cadres juridiques complexes. Les incidences de la pandémie sur le marché du travail ont accru la pertinence du cadre de qualité pour les stages tout en faisant apparaître la nécessité d'envisager des ajustements afin de la maintenir étant donné le rôle de plus en plus central joué par le travail à distance et les compétences numériques.

Les avis sur la pertinence de la nature non contraignante du cadre de qualité pour les stages sont plus partagés et dépendent généralement des différents groupes de parties prenantes. Les syndicats et les mouvements de jeunesse estiment généralement que la nature non contraignante du cadre de qualité pour les stages n'est pas pertinente pour atteindre ses objectifs, tandis que les autorités nationales et les organisations d'employeurs pensent que la nature non contraignante du cadre de qualité pour les stages est très pertinente, car elle tient compte de la diversité des environnements nationaux en matière d'éducation, de formation et de marché du travail et établit un équilibre entre la nécessité de garantir des normes minimales et le besoin de préserver un

certain degré de flexibilité. Les avis recueillis par l'étude sont également partagés, là aussi en fonction des différents groupes de parties prenantes, quant à savoir si des principes supplémentaires relatifs à la rémunération et à l'accès à la protection sociale pour les stagiaires augmenteraient la pertinence du cadre de qualité pour les stages. D'une part, les syndicats et les mouvements de jeunesse préconisent le renforcement de la pertinence du cadre de qualité pour les stages par le biais de principes relatifs à la rémunération et à l'accès à la protection sociale. D'autre part, les représentants des employeurs expriment des réserves sur la pertinence de tels principes, soulignant que les stagiaires ne devraient pas être définis comme des travailleurs ayant les mêmes droits à la rémunération et à la protection sociale que les salariés, car cela irait à l'encontre de l'objectif principal des stages qui est de fournir une opportunité d'apprentissage.

Enseignements tirés

Sur la base des constatations de l'étude, nous présentons ci-dessous des leçons à tirer pour l'avenir, structurées par catégorie.

Portée des stages couverts par le cadre de qualité pour les stages

- Le cadre de qualité pour les stages, et toutes les futures normes connexes, devrait définir plus en détail la portée des stages couverts afin de garantir une plus grande clarté pour toutes les parties prenantes.
- Dans l'ensemble, l'étude indique que la portée actuelle du cadre de qualité pour les stages – couvrant les stages ALMP et les stages sur le marché libre – est adaptée à l'objectif.

Contenu du cadre de qualité pour les stages, y compris ses principes

- Les recommandations et les principes énoncés dans le cadre de qualité pour les stages actuel pourraient être formulés de façon plus directe afin d'accroître leur efficacité et leur application, notamment pour ce qui est des principes fondamentaux (par exemple, l'établissement d'objectifs d'apprentissage).
- Des principes supplémentaires garantissant la rémunération des stagiaires et leur accès à la protection sociale devraient être envisagés. Cela contribuerait à améliorer l'accessibilité des stages pour tous les jeunes et répondrait aux préoccupations, centrées sur l'exploitation potentielle des stagiaires, des principaux groupes de parties prenantes – en particulier des jeunes eux-mêmes, de leurs représentants et des syndicats – eu égard au cadre de qualité pour les stages.
- Toutefois, afin de respecter les préoccupations des autres parties prenantes – en particulier les représentants des employeurs – et de veiller à ce que les stages restent une option attrayante pour les employeurs, il sera essentiel d'instaurer un dialogue constructif permanent avec les employeurs sur le niveau de rémunération et d'intégrer un certain degré de flexibilité dans la rémunération des stagiaires.
- Il est nécessaire d'intégrer une perspective d'égalité beaucoup plus importante et plus explicite dans la conception et l'application du cadre de qualité pour les stages afin qu'il puisse offrir des stages de qualité aux jeunes de tous horizons.
- Les futurs cadres de qualité pour les stages doivent clairement tenir compte des tendances actuelles et émergentes qui ont déjà une incidence majeure sur la nature des stages et le monde du travail en général. Il s'agit notamment de l'effet de la pandémie de Covid-19, des nouvelles formes de travail, d'apprentissage et d'emploi, ainsi que des transitions numérique et écologique.

- L'EFQEA ⁶ et le cadre de qualité pour les stages pourraient se voir mutuellement renforcés par une plus grande harmonisation, dans la mesure du possible, de leurs critères de qualité.

Renforcement de l'application au niveau national/régional

- L'étude montre clairement qu'une attention particulière doit être globalement accordée à la mise en œuvre sur le terrain des principes du cadre de qualité pour les stages, car elle est en retard sur l'application du cadre de qualité pour les stages dans les législations/cadres nationaux.
- Compte tenu de l'inadéquation actuelle des compétences, établir des liens plus étroits avec les besoins en compétences des marchés du travail locaux peut contribuer à accroître la qualité et la pertinence des stages, ce qui sera bénéfique tant pour les fournisseurs de stages que pour les stagiaires.
- Une meilleure adaptation de l'offre, des actions d'information et du soutien ciblé accordé aux employeurs et aux jeunes contribuerait à permettre aux jeunes, dans toute leur diversité, d'accéder à des stages de qualité.
- Les employeurs, y compris les PME, devraient être plus sensibilisés et mieux formés aux bénéfices des stages, notamment à la façon de remédier aux pénuries de compétences, à la manière dont les programmes de stages de qualité peuvent être élaborés et aux financements disponibles pour couvrir les frais encourus.
- Il existe encore des obstacles aux stages transfrontaliers, en partie parce que les approches réglementaires des stages sur le marché libre n'ont pas convergé depuis l'adoption du cadre de qualité pour les stages. Il serait utile de fournir des orientations claires aux fournisseurs de stages sur les réglementations en vigueur dans les différents pays et sur la manière d'engager des stagiaires d'autres pays.

Exécution, suivi et évaluation des stages et de l'application du cadre de qualité pour les stages

- Il est manifestement nécessaire d'améliorer la comparabilité des données disponibles, à l'échelle de l'UE, sur les stages et les stagiaires en général, car ce manque entrave actuellement le suivi de leur évolution et de l'incidence du cadre de qualité pour les stages.
- Le renforcement des mécanismes de contrôle et d'application aux niveaux national et régional aurait un effet positif important sur le respect de normes de qualité par les stages.

Coopération et apprentissage mutuel pour soutenir l'application du cadre de qualité pour les stages

- D'autres mécanismes pourraient être mis en œuvre au niveau de l'UE afin de réunir les principales parties prenantes nationales pour superviser, suivre et chercher à surmonter les obstacles à une application sur le terrain réussie du cadre de qualité pour les stages.

⁶ Cadre européen pour un apprentissage efficace et de qualité, voir [https://eur-lex.europa.eu/legal-content/fr/TXT/?uri=CELEX%3A32018H0502\(01\)](https://eur-lex.europa.eu/legal-content/fr/TXT/?uri=CELEX%3A32018H0502(01))

- L'application du cadre de qualité pour les stages pourrait bénéficier du soutien d'un réseau de parties prenantes engagées à travers l'UE, comme c'est le cas pour le soutien apporté par l'Alliance européenne pour l'apprentissage (EAfA) à l'application de l'EFQEA.
- Un renforcement de l'apprentissage mutuel au niveau de l'UE, y compris le partage d'exemples de bonnes pratiques en matière de développement et de mise en œuvre de stages de qualité, pourrait contribuer à inspirer les décideurs politiques nationaux ainsi que d'autres acteurs clés, ce qui, en retour, pourrait accroître la conformité et améliorer l'offre de stages de qualité.
- Une coopération accrue entre tous les acteurs clés impliqués dans les stages aux niveaux national, régional et local peut également jouer un rôle clé dans l'amélioration du suivi et le soutien de l'application. L'avis des stagiaires devrait être activement recherché, de même que la participation des ONG et des organismes représentant les jeunes.

Financement pour soutenir la mise en œuvre de stages de qualité et l'application du cadre de qualité pour les stages

- Les parties prenantes nationales et régionales devraient être mieux orientées vers les fonds européens disponibles pour soutenir la mise en œuvre de stages de qualité.
- Des incitations financières peuvent être proposées pour aider les employeurs à mettre en œuvre des stages de qualité, car elles se sont avérées particulièrement bénéfiques pour les petites et moyennes entreprises (PME).

Recherches complémentaires

- Il conviendrait d'approfondir les recherches sur les obstacles qui empêchent les employeurs de proposer des stages de qualité, ainsi que sur les obstacles qui empêchent les jeunes d'accepter des stages.
- Les différences entre les droits et les conditions des stages dans divers secteurs devraient être examinées plus avant et traitées afin de garantir l'équité pour tous les stagiaires.
- Des recherches sur les incidences de la pandémie de Covid-19 sur la qualité des stages et sur l'évolution de la forme que peuvent prendre les stages (par exemple, les stages numériques) permettraient de mieux adapter les futures normes de qualité aux besoins actuels et futurs.

Zusammenfassung

Diese Studie soll die Europäische Kommission hauptsächlich bei ihrer im Jahr 2022 vorgesehenen Bewertung der Empfehlung des Rates zu einem Qualitätsrahmen für Praktika (QRP) aus dem Jahr 2014 unterstützen⁷. Die Bewertung bietet acht Jahre nach Einführung des QRP die Gelegenheit, die Auswirkungen seiner Umsetzung zu beurteilen und zu untersuchen, ob Anpassungen oder Korrekturen erforderlich sind. Die Prüfung des QRP wurde als Maßnahme im Rahmen des Aktionsplans zur europäischen Säule sozialer Rechte⁸ definiert, welcher im März 2021, anlässlich des Gipfels in Porto verabschiedet wurde.

Die Studie zur Unterstützung der Bewertung soll insbesondere: ermitteln, was im Hinblick auf die angemessene Umsetzung des QRP funktioniert und was nicht (und weshalb); die derzeitige Situation hinsichtlich der Praktika innerhalb der EU sowie die wichtigsten Entwicklungen seit 2014 beschreiben; beurteilen, inwieweit die Empfehlung des Rates über den QRP von 2014 sich wirksam, effizient und kohärent gestaltet, einen EU-Mehrwert vermittelt und für die derzeitigen Anforderungen zweckdienlich ist.

Bei dem Geltungsbereich der Bewertung handelt es sich um die EU in ihrer derzeitigen Zusammensetzung aus 27 Mitgliedsstaaten. Die abgedeckte Zeitspanne umfasst den Zeitraum vom 4. Quartal 2014 bis zum 4. Quartal 2021. Die Studie beschäftigt sich mit den auf dem freien Markt angebotenen Praktika (PFM), sowie mit jenen, welche in den Rahmen der aktiven Arbeitsmarktpolitik (AAMP) fallen, wodurch (1) Berufspraktika ausgeschlossen wurden, welche Teil von Lehrplänen im Rahmen der Schulbildung bzw. der beruflichen Bildung sind, sowie (2) Praktika, welche im nationalen Recht geregelt sind, bzw. deren Abschluss eine zwingende Voraussetzung für den Zugang zu spezifischen Berufen ist (z. B. Medizin, Architektur, usw.).

Methodik

Unser methodischer Ansatz, welcher im Rahmen der Studie zum Einsatz gelangte, verband eine Reihe von Forschungsaufgaben mit analytischen Aufgaben, um belastbare Belege für die Bereitstellung fundierter Ergebnisse, Schlussfolgerungen und Lektionen zu sammeln, und war auf die Leitlinien für eine bessere Rechtsetzung exakt abgestimmt. Er umfasste: (1) gezielte Anhörungen (Gespräche mit maßgeblichen Akteuren auf EU- und einzelstaatlicher Ebene, Umfrage bei den Praktikanten, Expertentreffen, Validierungsseminar); (2) Kartierung der Situation in jedem der 27 Mitgliedsstaaten der EU seit 2014 im Hinblick auf Praktikumsqualität und Umsetzung des QRP; (3) Fallstudien zu sieben Mitgliedsstaaten (AT, BG, EL, ES, IE, IT, LT) zwecks eingehender Bewertung; (4) Unterstützung bei der Ausführung und der Analyse der Ergebnisse der öffentlichen Konsultation der Kommission; und (5) Analyse und Berichterstattung.

Die maßgeblichen Grenzen der Studie beinhalteten einen Mangel an vorhandenen belastbaren sekundären Nachweisen in Bezug auf die Verbreitung, Qualität und Wirkung der Praktika, die vielfältigen Regelungsansätze innerhalb der Mitgliedsstaaten, die Vielfalt der in die Durchführung der Praktika einbezogenen Akteure, das Vorliegen begrenzter quantifizierbarer Nachweise für die

⁷ <https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=CELEX%3A32014H0327%2801%29>

⁸ https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/economy-works-people/jobs-growth-and-investment/european-pillar-social-rights/european-pillar-social-rights-action-plan_de

Kosten und Nutzen der Umsetzung des QRP sowie einen geringen Bekanntheitsgrad des QRP bei den Akteuren.

Inwieweit war das Einschreiten erfolgreich?

Wirksamkeit

Die Grundsätze des QRP wurden in den einzelstaatlichen Rechtsvorschriften/Rahmenvorgaben für Praktika in moderatem Maße verankert, mit maßgeblichen Unterschieden innerhalb der Mitgliedsstaaten und zwischen den Praktikumsarten. 14 Mitgliedsstaaten haben ihre Gesetzgebung/Politik überarbeitet oder gesetzgeberische/politische Maßnahmen eingeführt, um den QRP seit dessen Verabschiedung in ihrer Gesetzgebung/ihren politischen Rahmenbedingungen durchzusetzen. Bemühungen zur Umsetzung des QRP erfolgen deutlicher in der nationalen Gesetzgebung zur Regelung von AAMP-Praktika, mit 18 Mitgliedsstaaten, welche die Grundsätze des QRP im Rahmen der nationalen Gesetzgebung/Politik für AAMP-Praktika ganz/im Wesentlichen umsetzen, im Vergleich zu sieben Mitgliedsstaaten bei den auf dem freien Markt angebotenen Praktika. Das Ziel der Empfehlung, kohärentere Regelungsansätze innerhalb der Mitgliedsstaaten sicherzustellen, wurde somit nur begrenzt erreicht, insbesondere bei den auf dem freien Markt angebotenen Praktika, da die Regelungsansätze sich seit Verabschiedung des QRP nicht wesentlich angenähert haben.

Selbst wenn die nationale Gesetzgebung eine weitreichende Umsetzung des QRP aufweist, führt dies in der Praxis nicht immer zu hochwertigen Praktika. Es gibt Überwachungs- und Durchsetzungsmechanismen für beide Praktikumsarten in allen Mitgliedsstaaten; sie sind jedoch auch weiterhin verbreiteter bei den AAMP-Praktika als bei den auf dem freien Markt angebotenen Praktika, und selbst dort, wo sie auf dem Papier existieren, zeigen unsere Erkenntnisse, dass sie sich auf die Sicherstellung der Anwendung des gesetzlichen Rahmens nur begrenzt auswirken.

Ein Ziel des QRP war die erhöhte Inanspruchnahme grenzüberschreitender Praktika innerhalb der EU. Diese Studie stieß auf Anzeichen dafür, dass grenzüberschreitende Praktika etwas häufiger anzutreffen sind, wobei jedoch ebenfalls klar ist, dass noch immer Hürden bestehen, um Zugang zu diesen Praktika zu erhalten. Sie beruhen zum Teil auf dem unterschiedlichen regulatorischen Umfeld für Praktika innerhalb der EU. Dies geht einher mit einem Mangel an Ressourcen und Informationen, und zwar für Praktikumsanbieter im Hinblick auf die Frage, wie sie junge Menschen aus dem Ausland einstellen können, und für junge Menschen im Hinblick auf die Frage, wie sie Praktikumsmöglichkeiten in anderen EU-Ländern in Anspruch nehmen können.

Die spezifischen Auswirkungen der Umsetzung des QRP auf die Praktikanten können aufgrund der vielfältigen Faktoren, welche die Erfahrungen und Ergebnisse der Praktikanten beeinflussen, zwar nicht einwandfrei festgestellt werden, aber es hat sich gezeigt, dass es seit 2014 zu Verbesserungen bei der Qualität der Praktika kam und hochwertige Praktika sich auf die jungen Menschen positiv auswirken im Hinblick auf die Erleichterung einer stabilen Arbeitsmarktintegration und den Beitrag zur Jugendbeschäftigung. Die Studie ließ jedoch ebenfalls erkennen, dass Ungleichheiten bestehen, was den Zugang zu Praktikumsmöglichkeiten anbelangt. Junge Menschen aus ländlichen Gebieten, mit einem niedrigeren sozioökonomischen Hintergrund und niedrigerem Bildungsstand wurden als Gruppen identifiziert, welche über weniger Praktikumsmöglichkeiten verfügen können. Aus den Daten geht ebenfalls hervor, dass einige Sektoren in stärkerem Maße zu minderwertigen Praktika neigen, einschließlich Kunst, Unterhaltung und Freizeit, Gesundheits- und Sozialwesen sowie Erziehung. Bei Sektoren mit einem größeren Anteil an kleinen Unternehmen war die Wahrscheinlichkeit außerdem größer, dass sie den QRP bei ihren Praktika nicht anwenden, in erster Linie aufgrund des vermeintlichen Verwaltungsaufwands.

Effizienz

Was den Nutzen anbelangt, zeigt die Studie, dass die jungen Menschen Verbesserungen bei der Praktikumsqualität verzeichneten, da die Praktikanten weniger stark ausgenutzt wurden und Kenntnisse und Kompetenzen erwarben, welche ihre Chancen auf einen Eintritt ins Berufsleben erhöhen. Der maßgebliche Nutzen einer Anwendung der Grundsätze des QRP gestaltete sich für die Arbeitgeber folgendermaßen: Sie erhöhen das Verständnis des Arbeitgebers für die Praktikumsqualität; sie verbessern das Ansehen der Arbeitgeber und erhöhen ihre Attraktivität für junge Arbeitnehmer; sie bieten den Arbeitgebern die Möglichkeit, jungen Arbeitnehmern Berufserfahrung zu vermitteln, ohne den vollen Lohn zu zahlen, und gleichzeitig in diese Personen zu investieren; und sie versetzen die Arbeitgeber in die Lage, Arbeitnehmer tatsächlich „auszuprobieren“. Auch die Gesellschaft zieht Nutzen aus einer niedrigeren Arbeitslosenquote und einem verbesserten Übergang von der Schule ins Berufsleben.

Betrachtet man die Kosten, berichteten die Arbeitgeber über Anpassungskosten in Verbindung mit der Betreuung der Praktikanten, der Bewertung und Bescheinigung der Kompetenzen der Praktikanten sowie der Entwicklung von Ausbildungskonzepten. In Fällen, bei denen diese Kosten bezuschusst oder zurückerstattet werden, geht die Beantragung und Verwaltung der Zuschüsse mit Verwaltungskosten einher, insbesondere bei kleinen Unternehmen. Insgesamt herrschte die Meinung vor, dass die mit dem QRP verbundenen Kosten für die Arbeitgeber niedrig waren. Die Kosten gestalten sich wahrscheinlich jedoch erheblicher für kleinere Betriebe, welche über weniger Ressourcen verfügen, die dem Verständnis der Praktikumsanforderungen und der Betreuung der Praktikanten gewidmet werden können; und sie waren höher bei den auf dem freien Markt angebotenen Praktika als bei den AAMP-Praktika, da letztere deutlich mehr finanzielle Instrumente und Unterstützung für die Arbeitgeber bieten und die von ihnen zu übernehmenden Kosten dadurch begrenzen.

Die Anpassungskosten für nationale Behörden beinhalten die direkten Arbeitskosten in Verbindung mit der Gestaltung von Programmen, der Umsetzung der neuen Gesetzgebung und der Investitionen in öffentliche Dienste und Arbeitsaufsichtsstellen zur Überwachung der Einhaltung dieser Vorgaben; die laufenden Kosten beinhalten wiederum die Kosten der Zuschüsse und Beihilfen zur Unterstützung der Praktika.

Die Hindernisse, auf die Arbeitgeber bei der Bereitstellung von Praktika stoßen, konzentrieren sich auf die unübersichtlichen ordnungsrechtlichen und administrativen Vorgaben für Praktikumsangebote. Die Arbeitgeber hoben die Unübersichtlichkeit der bestehenden gesetzlichen Rahmen für die auf dem freien Markt angebotenen Praktika und administrative Herausforderungen bei der Verwaltung der Zusammenarbeit mit den öffentlichen Arbeitsverwaltungen und der finanziellen Anreize (bei AAMP-Praktika) hervor. Herausforderungen aufgrund einer mangelnden Fähigkeit, die Lernelemente auf das Praktikum anzuwenden, wurden ebenfalls als häufige Hindernisse bei beiden Praktikumsarten genannt.

Die Untersuchungsergebnisse legen insgesamt nahe, dass der Verwaltungsaufwand für die Umsetzung des QRP allgemein im Verhältnis zum Nutzen steht. Ein Hauptgrund ist die Tatsache, dass die gesamten Kosten in Verbindung mit dem QRP sich niedrig gestalten, während der Nutzen, und zwar insbesondere der potenzielle zukünftige Nutzen potenziell hoch ist. Das Kosten-Nutzen-Verhältnis und somit die Effizienz gestaltet sich jedoch aufgrund verschiedener Faktoren unterschiedlich: Effizienz wird nur dann erreicht, wenn der QRP hochwertigere Praktika fördert; die Umsetzung des QRP gestaltet sich bei Klein- und Kleinstunternehmen weniger effizient als bei großen Firmen; die Effizienz ist größer, wenn den Arbeitgebern ein Anreiz geboten wird, einem jungen Menschen einen Arbeitsplatz nach Abschluss eines Praktikums anzubieten. Die Indizien deuten ebenfalls an, dass es schwierig wäre, den gesamten Verwaltungsaufwand in Verbindung mit dem QRP zu verringern, ohne ebenfalls den Umfang der Leistungen zu schmälern.

Kohärenz

Insgesamt liegen ein ziemlich hohes Maß an Kohärenz und Ergänzungsfähigkeit zwischen den Zielen, den Zielgruppen und den Maßnahmen zur Umsetzung des QRP sowie den

zweckdienlichen politischen Maßnahmen auf nationaler und regionaler Ebene in den Bereichen Aus- und Fortbildung, Beschäftigung und Sozialpolitik vor. Das Maß an Kohärenz gestaltet sich jedoch sowohl innerhalb der Länder der EU als auch je nach politischem Bereich unterschiedlich. Es liegen mehr Anhaltspunkte für Kohärenz bei den nationalen und regionalen Maßnahmen vor dem Hintergrund der AAMP als bei den auf dem freien Markt angebotenen Praktika vor. Das höchste Maß an Kohärenz kann insgesamt bei der nationalen und regionalen Politik im Bereich Beschäftigung ermittelt werden, im Vergleich zu den politischen Bereichen Ausbildung, Fortbildung und Sozialpolitik.

Die Ziele, die Zielgruppen und die Maßnahmen zur Umsetzung des QRP verzeichnen sowohl vor dem Hintergrund der Praktika im Rahmen der AAMP als auch der auf dem freien Markt angebotenen Praktika insgesamt ein angemessenes Maß an Übereinstimmung mit anderen zweckdienlichen Initiativen, Mitteln und Programmen der EU. Hinweise auf Überschneidungen oder Doppelregelungen wurden nicht gefunden. Der QRP steht in Einklang mit den zweckdienlichen übergreifenden Strategien der EU, der EU-Jugendpolitik, den Initiativen der EU in Bezug auf Praktika und Lehrlingsausbildung sowie der Beschäftigungspolitik der EU. Er steht ebenfalls in Einklang mit den maßgeblichen Finanzierungsmechanismen der EU, einschließlich der Beschäftigungsinitiative für junge Menschen (YEI), des ESF+, des Aufbauinstruments NextGenerationEU und Erasmus+.

Inwieweit bewirkte das Einschreiten der EU etwas?

EU-Mehrwert

Der QRP verleiht der nationalen und regionalen Situation in Verbindung mit Praktika einen Mehrwert in etlichen Mitgliedsstaaten. Das Ausmaß des EU-Mehrwerts gestaltet sich jedoch unterschiedlich in Übereinstimmung mit einzelnen Faktoren, wie der Frage, ob bereits Instrumente und Maßnahmen vorhanden waren und inwieweit sie seit Verabschiedung des QRP verbessert wurden. Der QRP bietet insbesondere eine Struktur auf EU-Ebene sowie einen Rahmen für das Handeln auf einzelstaatlicher Ebene in den Mitgliedsstaaten und kann ebenfalls dazu dienen, den Argumenten der einzelstaatlichen Akteure Gewicht zu verleihen. Einige der neueren Mitgliedsstaaten begrüßten ferner das Bestehen des QRP vor allem als Leitinstrument für eine Neuformulierung der Politik.

Die Meinungen über die Folgen einer Aussetzung des QRP auf EU-Ebene und die Prognose für ein Szenario der unveränderten Politik spalten sich tendenziell in zwei Gruppen. Einige Akteure sind der Ansicht, eine Aussetzung des QRP bzw. seine unveränderte Fortsetzung würde keinerlei Auswirkungen haben, da seine Grundsätze nun in die einzelstaatliche Gesetzgebung eingebettet sind. Der Großteil der Meinungen gibt jedoch eindeutig zu erkennen, dass der QRP beibehalten werden soll. Eine Reihe von Akteuren forderte ebenfalls eine Verstärkung des derzeitigen QRP auf unterschiedliche Weise. Dies umfasste die Einführung unterstützender Maßnahmen wie das gegenseitige Lernen und den Austausch bzw. wesentlichere Veränderungen, einschließlich zusätzlicher Grundsätze zur Erhöhung seines Mehrwerts.

Ist das Einschreiten immer noch zweckdienlich?

Zweckdienlichkeit

Die Studie zeigt, dass der QRP für die Förderung der Arbeitsmarktintegration junger Menschen äußerst zweckdienlich ist, wobei die Bereitstellung einer schriftlichen Vereinbarung und der Schwerpunkt auf den Lernzielen des Praktikums als sachdienlichste Grundsätze hervorstechen, um positive Ergebnisse nach Abschluss des Praktikums zu erzielen.

Der QRP gestaltet sich insgesamt auch weiterhin zweckdienlich, da Problemstellungen wie eine hohe Jugendarbeitslosigkeits- und NEET-Quote, minderwertige Praktika und komplizierte gesetzliche Rahmenvorgaben auch weiterhin bestehen. Die Auswirkungen der Pandemie auf den

Arbeitsmarkt erhöhten die Zweckdienlichkeit des QRP und bewirkten ebenfalls, dass Anpassungen am QRP geprüft werden müssen, um seine fortdauernde Zweckdienlichkeit angesichts der zunehmend zentralen Rolle von Telearbeit und digitalen Kompetenzen sicherzustellen.

Die Meinungen über die Zweckdienlichkeit der Unverbindlichkeit des QRP gestalten sich gemischter und bewirken tendenziell einen Zusammenschluss einzelner Gruppen von Akteuren. Gewerkschaften und Jugendverbände sind allgemein der Meinung, die Unverbindlichkeit des QRP gestalte sich für die Erreichung seiner Ziele nicht zweckdienlich, während einzelstaatliche Behörden und Arbeitgeberverbände der festen Ansicht sind, die Unverbindlichkeit des QRP sei äußerst zweckdienlich, da sie die Vielfalt des einzelstaatlichen Erziehungs-, Ausbildungs- und Arbeitsmarktumfelds berücksichtigt und ein Gleichgewicht zwischen der notwendigen Sicherstellung von Mindestanforderungen und der erforderlichen Erhaltung eines gewissen Flexibilitätsgrades herstellt. Die Ergebnisse der Studie gestalten sich auch an dieser Stelle je nach einzelnen Beteiligengruppen gemischt im Hinblick auf die Frage, ob zusätzliche Grundsätze zur Vergütung oder zum Zugang zur sozialen Absicherung für Praktikanten die Zweckdienlichkeit des QRP erhöhen würden. Auf der einen Seite fordern Gewerkschaften und Jugendverbände eine Erhöhung der Zweckdienlichkeit des QRP über Grundsätze zur Vergütung und zum Zugang zur sozialen Absicherung. Auf der anderen Seite bringen die Vertreter der Arbeitgeber Vorbehalte hinsichtlich der Zweckdienlichkeit derartiger Grundsätze zum Ausdruck und heben hervor, dass die Praktikanten nicht als Arbeitnehmer mit den gleichen Ansprüchen im Hinblick auf Vergütung und soziale Absicherung definiert werden sollen, da eine solche Einstufung den Hauptzweck der Praktika schmälern würde, nämlich ein Bildungsangebot bereitzustellen.

Maßgebliche Schlussfolgerungen

Wir stellen auf der Grundlage der Ergebnisse der Studie nachstehend einige maßgebliche, in Kategorien aufgegliederte Schlussfolgerungen für die Zukunft vor.

Geltungsbereich der vom QRP betroffenen Praktika

- Der Geltungsbereich für die betroffenen Praktika sollte im QRP und in allen zukünftigen Qualitätsmaßstäben für Praktika genauer definiert werden, um eine bessere Übersichtlichkeit für alle Akteure zu gewährleisten.
- Die Untersuchung weist alles in allem darauf hin, dass der derzeitige Geltungsbereich des QRP – welcher AAMP-Praktika und die auf dem freien Markt angebotenen Praktika abdeckt – für den angestrebten Zweck geeignet ist.

Inhalt des QRP, einschließlich der QRP-Grundsätze

- Die Formulierung der Empfehlungen und Grundsätze des derzeitigen QRP könnten sich direkter gestalten, um ihre Wirksamkeit und Umsetzung zu erhöhen, insbesondere bei den Kerngrundsätzen (z. B. Festlegung von Lernzielen).
- Zusätzliche Grundsätze sollten geprüft werden, welche die Vergütung der Praktikanten und ihren Zugang zur sozialen Absicherung gewährleisten. Dies würde begünstigen, Praktika zu einer leichter zugänglichen Möglichkeit für junge Menschen zu machen, und würde auf die QRP-relevanten Bedenken der maßgeblich beteiligten Gruppen – in deren Mittelpunkt die potenzielle Ausnutzung der Praktikanten steht – und zwar insbesondere der jungen Menschen selbst sowie ihrer Vertreter und Gewerkschaften eingehen.
- Um der Bedenken anderer maßgeblicher Akteure – insbesondere der Arbeitgebervertreter – jedoch Rechnung zu tragen und sicherzustellen, dass Praktika auch weiterhin eine interessante Option für die Arbeitgeber bleiben, wird es entscheidend darauf ankommen, dass auch weiterhin ein ständiger konstruktiver Dialog mit den Arbeitgebern über das

Vergütungsniveau geführt wird und ein gewisser Flexibilitätsgrad bei der Vergütung der Praktikanten inbegriffen ist.

- Ein viel breiter angelegter und eindeutigerer Gleichstellungsaspekt muss in die Planung und Umsetzung des QRP einbezogen werden, um sicherzustellen, dass er hochwertige Praktika für junge Menschen mit unterschiedlichstem Hintergrund bietet.
- Zukünftige Qualitätsrahmen für Praktika müssen sich mit neueren und aufkommenden Trends eindeutig befassen, welche bereits größere Auswirkungen auf die Beschaffenheit der Praktika und den Arbeitsplatz allgemein haben. Dies beinhaltet die Auswirkungen der Covid-19-Pandemie, neue Arbeits-, Lern- und Beschäftigungsformen sowie den digitalen und ökologischen Wandel.
- Eine nach Möglichkeit umfassendere Harmonisierung zwischen den Qualitätskriterien im EFQEA⁹ und dem QRP könnte beide Qualitätsrahmen gegenseitig verstärken.

Ankurbelung der Umsetzung auf nationaler/regionaler Ebene

- Die Studie zeigt eindeutig auf, dass besondere Aufmerksamkeit insgesamt der praktischen Umsetzung der QRP-Grundsätze gewidmet werden muss, welche der Umsetzung des QRP in das nationale Recht/den nationalen Rahmen hinterherhinkt.
- In Anbetracht derzeitiger Qualifikationsdiskrepanzen kann die Sicherstellung einer besseren Verknüpfung mit den Kompetenzanforderungen der örtlichen Arbeitsmärkte dazu beitragen, die Qualität und Zweckdienlichkeit der Praktika zu erhöhen, wovon sowohl die Praktikumsanbieter als auch die Praktikanten profitieren.
- Eine bessere Abstimmung der Bereitstellung, Sensibilisierung und gezielten Unterstützung von Arbeitgebern und jungen Menschen würde dazu beitragen, dass junge Menschen in ihrer ganzen Vielfalt Zugang zu hochwertigen Praktika erhalten.
- Mehr Sensibilisierungs- und Schulungsmaßnahmen in Bezug auf den Nutzen von Praktika sollten für die Arbeitgeber, einschließlich der KMU ausgerichtet werden, welche die Überwindung von Qualifikationsdefiziten, die Vorgehensweise bei der Entwicklung hochwertiger Praktikumspläne und die zur Verfügung stehende Finanzierung zur Abfederung der anfallenden Kosten umfassen.
- Noch immer bestehen Hindernisse für grenzüberschreitende Praktika, teilweise weil die Regelungsansätze für die auf dem freien Markt angebotenen Praktika sich seit Verabschiedung des QRP noch nicht angenähert haben. Eine klare Orientierungshilfe für Praktikumsanbieter über die bestehenden Regelungen in verschiedenen Ländern und zu der Frage, wie Praktikanten aus anderen Ländern eingestellt werden können, wäre nützlich.

Durchsetzung, Überwachung und Bewertung von Praktika und Umsetzung des QRP

- Es besteht ein eindeutiger Bedarf an besser vergleichbaren EU-weiten Daten über die Praktika und die Praktikanten allgemein, da dieser Datenmangel derzeit die Überwachung ihrer Entwicklung und der Auswirkungen des QRP behindert.

⁹ Europäischer Rahmen für eine hochwertige und nachhaltige Lehrlingsausbildung, siehe <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A32018H0502%2801%29>

- Eine Verstärkung der Überwachungs- und Durchsetzungsmechanismen auf nationaler und regionaler Ebene hätte starke positive Auswirkungen auf die Einhaltung der Qualitätsanforderungen bei Praktika.

Zusammenarbeit und gegenseitiges Lernen zur Unterstützung der Umsetzung des QRP

- Weitere Mechanismen könnten auf der Ebene der EU umgesetzt werden, um die maßgeblichen einzelstaatlichen Akteure zusammenzuführen, damit sie Hindernisse im Hinblick auf die erfolgreiche praktische Umsetzung des QRP überwachen und beobachten und danach streben, diese Hindernisse zu überwinden.
- Die Umsetzung des QRP könnte von der Unterstützung eines Netzes engagierter Akteure innerhalb der EU profitieren, wie dies bei der Unterstützung durch die Europäische Ausbildungsallianz (EAfA) im Rahmen der Umsetzung des EFQEA der Fall ist.
- Mehr gegenseitiges Lernen auf der Ebene der EU, einschließlich der gemeinsamen Nutzung von Beispielen für erprobte Vorgehensweisen in den Bereichen Entwicklung und Umsetzung hochwertiger Praktika, könnte dazu beitragen, sowohl die einzelstaatlichen Entscheidungsträger als auch andere maßgebliche Akteure anzuspornen, welche wiederum die Einhaltung verstärken und die Bereitstellung hochwertiger Praktika verbessern könnten.
- Eine verstärkte Zusammenarbeit aller maßgeblichen Akteure, welche auf landesweiter, regionaler und ebenfalls örtlicher Ebene in die Praktika einbezogen sind, kann ebenfalls eine entscheidende Rolle bei der verbesserten Überwachung und Unterstützung der Umsetzung spielen. Der Stimme der Praktikanten sollte aktiv Gehör geschenkt werden, während die Einbindung von NGOs und Jugendvertretungseinrichtungen gleichermaßen aktiv angestrebt werden sollte.

Mittel zur Unterstützung der Umsetzung hochwertiger Praktika und des QRP

- Mehr Möglichkeiten zur Erschließung der zur Verfügung stehenden EU-Mittel für die Unterstützung der Umsetzung hochwertiger Praktika sollten für nationale und regionale Akteure angeboten werden.
- Eine Reihe finanzieller Anreize, bei denen bereits erwiesen ist, dass sie von besonderem Nutzen für kleine und mittlere Unternehmen (KMU) sind, kann angeboten werden, um die Arbeitgeber bei der Umsetzung hochwertiger Praktika zu unterstützen.

Weitere Untersuchungen

- Weitere Untersuchungen sollten durchgeführt werden im Hinblick auf die für die Arbeitgeber bestehenden Hindernisse, hochwertige Praktika anzubieten, desgleichen wie im Hinblick auf die Hemmnisse, welche junge Menschen daran hindern, ein Praktikum zu absolvieren.
- Unterschiede bei den Rechten und Voraussetzungen von Praktika in verschiedenen Sektoren sollten weiter untersucht und behoben werden, um die Gleichstellung aller Praktikanten zu gewährleisten.
- Untersuchungen über die Auswirkungen der Covid-19-Pandemie auf die Qualität der Praktika und die Entwicklung der Praktikumsmittel (z. B. digitale Praktika) würden eine bessere Abstimmung der zukünftigen Qualitätsstandards und eine Anpassung an die Bedürfnisse sowohl derzeit als auch in Zukunft ermöglichen.

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Glossary and abbreviations

Table 1. Glossary of terms used in the report

Term or acronym	Meaning or definition
Active Labour Market Policy (ALMP) Traineeships	One of the two types of traineeships that falls within the scope of the QFT. This type of traineeship is offered to (young) unemployed or those at risk of becoming unemployed to increase their employability/skills with a view to supporting their entry into the labour market. There is usually a public institution (most often a PES) acting as an intermediary between the host organisation and the trainee. This intermediary institution also has a supervising function in terms of traineeship quality. ¹⁰
Open market traineeships	One of the two types of traineeships that falls within the scope of the QFT. Open market traineeships are defined as non-mandatory, bilateral, and private agreements between a trainee and a traineeship provider. They do not have a formal connection to education or training and there is no third party in addition to the trainee and the traineeship provider. ¹¹ The main beneficiaries of this type of traineeship are students and graduates.
Trainee	A person undertaking a traineeship. Their status in employment law depends on the type of traineeship undertaken and national legislation in place. ¹²
Traineeships	Sometimes called internships or 'stages' are one of the main entry points into the labour market for young people. Traineeships are understood as a limited period of work practice, whether paid or not, which includes a learning and training component, undertaken in order to gain practical and professional experience with a view to improving employability and facilitating transition to regular employment. ¹³
Traineeships that are part of the curricula of formal education	Traineeships that are part of the curricula of formal education or vocational education and training (VET) are optional or mandatory work-based learning. They are part of the curriculum or of the graduation procedure and are thus often concluded with the involvement of the educational institutions. ¹⁴ These traineeships do not fall within the QFT scope, as it is considered that those traineeships are of better quality, due to the quality assurance by the educational institutions involved. ¹⁵
Traineeships that have to be completed to access a specific profession	The completion of this type of traineeship is mandatory in order to access a specific profession (e.g., teaching, medicine, architecture, etc.). This type of traineeship does not fall within the scope of the QFT as it is considered that these traineeships are of better quality, due to the quality assurance by the educational institutions involved. ¹⁶
Apprenticeships	Apprenticeships are systematic, long-term training alternating periods at the workplace and in an educational institution or training centre. Their characteristics (e.g., occupation, duration, skills to be acquired, wage or allowance) are defined in a training contract or formal agreement between the apprentice and the employer directly or via the education institution. Apprenticeships are usually part of formal education and training at upper secondary level (ISCED 3) with an average duration of 3 years whose successful completion results in a nationally recognised qualification in a specific occupation. ¹⁷

¹⁰ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1477901513625&uri=CELEX:52016SC0324>

¹¹ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1477901513625&uri=CELEX:52016SC0324>

¹² See: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0495:FIN:EN:PDF>

¹³ See: [https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327\(01\)](https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327(01))

¹⁴ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52012SC0407>

¹⁵ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1477901513625&uri=CELEX:52016SC0324>

¹⁶ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1477901513625&uri=CELEX:52016SC0324>

¹⁷ See: <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0495:FIN:EN:PDF>

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

Cross-border traineeships	Traineeships taking place in another EU country, which is not the trainee's country of residence. The QFT aims to increase the cross-border mobility of trainees in the EU by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities. ¹⁸
European Framework for Effective and Quality Apprenticeships (EFQEA)	A Council Recommendation adopted in 2018 that defines a framework with 14 criteria on quality and effective apprenticeships, ensuring both the development of job-related skills and the personal development of apprentices. ¹⁹
Labour inspectorates	Labour inspectorates are national authorities tasked with monitoring compliance with the labour law in a respective country. ²⁰
Implementation of the QFT in national legislation/frameworks	This refers to how Member States have implemented the principles of the QFT that can be implemented into national legislation– namely, the 12 principles that refer to standards and conditions of traineeship, as outlined in Figure 1.
Implementation of the QFT on the ground	This refers to the degree to which traineeships taking place in Member States actually comply with the principles of the QFT on the ground.
NEET	An acronym for a young person 'not in employment, education or training' that refers to the situation of many young persons, aged between 15 and 29. The NEET concept aims to broaden understanding of the vulnerable status of young people ²¹ and to better monitor their problematic access to the labour market. It has been widely used as an indicator to inform youth-oriented policies on employability, education, training and also social inclusion in the EU Member States since 2010. ²²
Quality Framework for Traineeships (QFT)	The Council Recommendation on a Quality Framework for Traineeships (QFT) of March 2014. It provides a framework of recommendations on the quality of traineeships in terms of learning content, working conditions, and transparency regarding financial conditions and hiring practices. The Recommendation contains 22 principles for Member States: 18 principles that are directly implementable into national legislation/quality frameworks, and four cross-cutting principles for Member States on cross-border traineeships, EU funding and cooperation, that can be implemented through policy actions and cooperation across relevant actors; it also contains six principles for the European Commission in terms of actions to support Member State efforts to apply the QFT. ²³
Social partner	A term used in Europe to refer to representatives of management and labour (employer organisations and trade unions), and in some cases public authorities, that engage in social dialogue. The term 'European social partners' specifically refers to those organisations at EU level which are engaged in European social dialogue, provided for under Articles 154 and 155 of the Treaty on the Functioning of the European Union (TFEU). ²⁴
Youth Guarantee	Instrument that provides 15- to 29-year-olds with an offer of employment, continued education, apprenticeship or traineeship within four months of becoming unemployed or leaving education. Traineeship offers under the Youth Guarantee should use the QFT as a reference. ²⁵

¹⁸ See: [https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327\(01\)](https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327(01))

¹⁹ See: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018H0502%2801%29>

²⁰ See: <https://ec.europa.eu/social/main.jsp?catId=157&langId=en>

²¹ Vulnerable young people refers to groups of young people that face particular challenges related to participation and inclusions and include (but are not limited to), persons with disabilities, low-skilled and long-term unemployed people, young people not in employment, education or training (NEETs), people with caring responsibilities, Roma and people with a migrant background. See <https://data.consilium.europa.eu/doc/document/ST-14646-2019-INIT/en/pdf>

²² See: <https://www.eurofound.europa.eu/topic/neets>

²³ See: [https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327\(01\)](https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32014H0327(01))

²⁴ See: <https://www.eurofound.europa.eu/topic/social-partners>

²⁵ See: <https://ec.europa.eu/social/main.jsp?catId=1079&langId=en>

Table 2. Abbreviations and acronyms used in the report

Term or acronym	Meaning or definition
ALMP	Active Labour Market Policy
EASE	Effective Active Support to Employment
EFQEA	European Framework for Quality and Effective Apprenticeships
EPSR	European Pillar of Social Rights
ESF+	European Social Fund Plus
NEET	Not in Employment, Education or Training
OMT	Open Market Traineeships
PES	Public Employment Service
QFT	Quality Framework for Traineeships
RRF	Recovery and Resilience Facility
SME	Small and medium sized enterprise ²⁶
YEI	Youth Employment Initiative
Acronym	Meaning or definition
AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czechia
DE	Germany
DK	Denmark
EE	Estonia
EU	European Union
ES	Spain
FI	Finland
FR	France
EL	Greece
HR	Croatia
HU	Hungary
IE	Ireland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

²⁶ European Commission, 2019, User Guide to the SME definition.

<https://ec.europa.eu/docsroom/documents/42921/attachments/1/translations/en/renditions/native#:~:text='The%20category%20of%20micro%2C%20small,not%20exceeding%20EUR%2043%20million.>

1. Introduction

1.1. Purpose and scope of the study

This study comes at crucial juncture for EU youth employment and training policy. Measures to support the sustainable labour market integration and appropriate training of young people across the EU are having to adapt at an ever-increasing pace to the changing demands of the digital and green transition, globalisation and demographic shifts. The Covid-19 pandemic has further accelerated these changes, altering the way that people learn, work and connect.

Traineeships are a key stepping-stone between school and paid, sustainable employment for young people. Undertaking traineeships can increase the employability and facilitate the transition of young people into stable jobs, through gaining experience in the workplace, learning the practical application of knowledge acquired in academic settings, developing job-related and transversal skills and expanding social networks²⁷. However, research suggests that the benefits of traineeships are strongly linked to their quality²⁸. The quality of traineeships can differ dramatically, and some traineeships may not provide useful training and skills development. Furthermore, if the quality of traineeships is not adequately regulated and monitored, trainees run the risk of being treated as cheap labour.

Recognising both these benefits and risks, the 2014 **Council Recommendation on a Quality Framework for Traineeships** (QFT) was adopted as part of a package of measures to tackle the youth employment crisis of 2012-2013. It aimed to provide a common framework for Member States and stakeholders in the EU on quality traineeships. The QFT comprises 28 principles in total, with 22 of these principles addressed to Member States grouped under ten key dimensions and six addressed to the European Commission. It applies to traineeships taking place in the open market and those that are part of Active Labour Market Policies (ALMPs). The Recommendation, whilst adopted prior to the adoption of the **Sustainable Development Goals (SDG)**, also clearly contributes to their achievement, through its focus on ensuring the learning dimension of traineeships which supports implementation of SDG 4 “*Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all*” and through its focus on fostering labour market integration which supports implementation of SDG 8 “*Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all*”.

The **overall purpose of this study** is to support the European Commission in its 2022 evaluation of the Council Recommendation on a QFT. Eight years on from the introduction of the QFT, the evaluation provides a highly relevant opportunity to assess the impact of its implementation and explore whether any adaptations or adjustments are required. The review of the QFT was defined as an action in the European Pillar of Social Rights Action Plan, adopted at the Porto Summit in March 2021.

The study supporting the evaluation aims specifically to:

- Establish what works and what does not work (and why) in terms of adequate QFT implementation, which involves an assessment of:
 - The extent to which the principles of the QFT have been adequately transposed into national legislation and/or national quality frameworks;
 - The extent to which enforcement and/or regular follow-up monitoring to verify compliance with national legislation and/or national quality frameworks exists;

²⁷ Stewart et al. (2021) Internships, Employability and the search for decent work experience

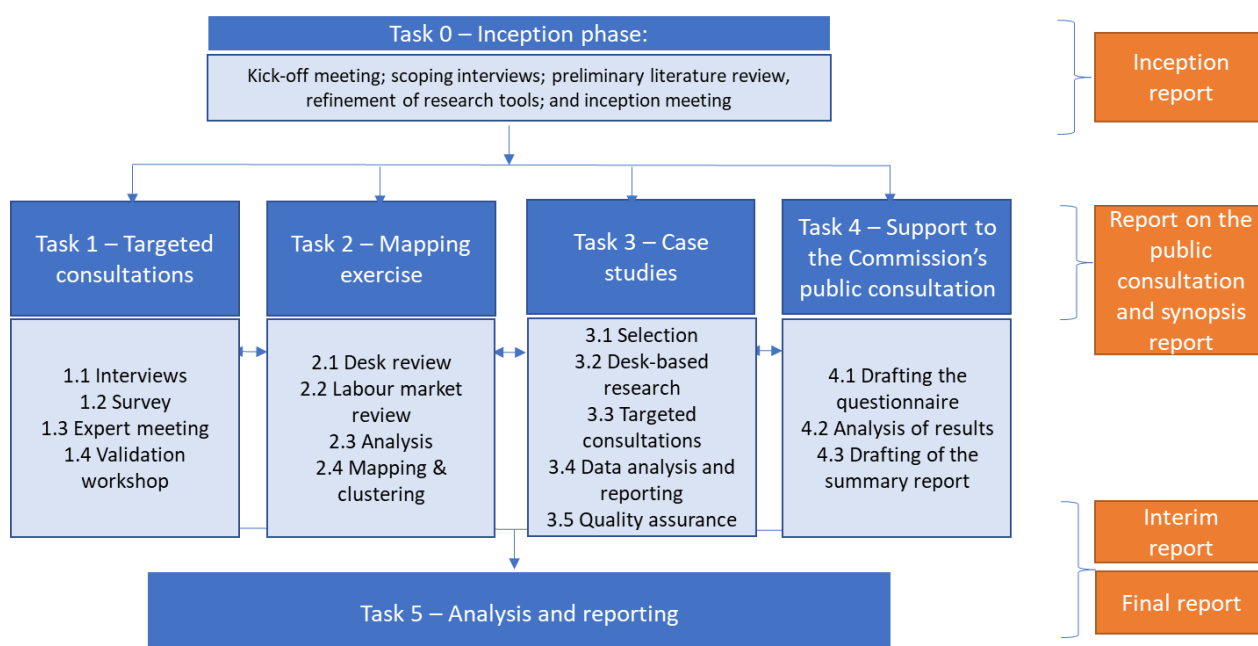
²⁸ ILO (2018) Interns and outcomes: Just how effective are internships as a bridge to stable employment?

- The level of on-the-ground compliance with national legislation and/or national quality frameworks on traineeships.
- Describe the current situation in terms of traineeships across the EU and the main developments since 2014;
- Assess the extent to which the 2014 Council Recommendation on the QFT is effective, efficient, coherent, brings EU added value and is relevant to current needs through:
 - An analysis of the extent to which the QFT principles are adequately implemented across the Member States;
 - An analysis of the extent to which the QFT principles and the nature of the 2014 QFT are still suitable and sufficient for the 2014 Council Recommendation to remain fit for purpose;
 - The extent to which elements that would have an impact on the quality of traineeships are absent from the 2014 QFT;
 - The extent traineeships and the QFT implementation have had an impact on youth employment.

The **scope** of the evaluation is the EU in its present composition of 27 Member States. The time span covered is the period from **Q4 2014 to Q4 2021**. The study focuses on open market traineeships and those that fall under Active Labour Market Policies (ALMP), thereby excluding 1) work experience placements that are part of curricula of formal education or vocational education and training; and 2) traineeships regulated under national law and whose completion is a mandatory requirement to access a specific profession (e.g., medicine, architecture, etc.).

1.2. Methodology

Our methodological approach takes full account of the objectives of the study, as well as the methodological requirements set out in the technical specifications and in the Better Regulation Guidelines. This has allowed us to effectively evaluate the implementation of the Quality Framework for Traineeships (QFT) and provide a robust contribution to understanding how and what works in ensuring that young people undertake quality traineeships which support their transition into stable employment.

Figure 1. Overview of the methodology

The study commenced with an inception phase (Task 0) which set the foundations of the evaluation. Following the inception phase, our team worked largely in parallel across Tasks 1 to 4 which were closely interrelated and built upon each other to gather a robust evidence base. The interview subtask (Task 1.1) in particular filled any gaps identified in the mapping research (Task 2) and supported the analysis of the degree of implementation of the QFT both in national legislation and on the ground. The survey of trainees (Task 1.2) complemented the qualitative evidence from the interviews with the views of trainees and potential trainees. The case studies (Task 3) built on the information gathered from the mapping exercise (Task 2) and the targeted consultations (Task 1), to gain more in-depth insights on implementation of the Recommendation in selected Member States including through further interviews and focus groups with young people. The public consultation conducted under Task 4 gathered the views of a wider group of stakeholders.

Tasks 1 to 4 all contributed to the final analysis and reporting of the study (Task 5). The findings from each of the different tasks were synthesised and triangulated to provide preliminary findings in the Interim report and comprehensive answers to all evaluation questions and sub-questions in this final report.

A detailed overview of the methodology for the study is included in Annex 1.

1.3. Limitations of the study

There were a number of specific limitations associated with the scope and coverage of the research, the quality of available data and the methodology that was developed, given the constraints of the available resources for the study. These limitations were taken into account in the design and implementation of the study as outlined in the Table below.

Table 3. Key limitations of the research

Limitation/challenge	Explanation	Mitigation measures taken
Lack of existing solid secondary evidence on traineeship prevalence, quality and impact on young people's transition to the labour market	Due in part to the diversity of definitions of traineeships, as well as the range – and sometimes absence – of regulatory approaches to traineeships in Member States, there is a lack of solid evidence on traineeships in Europe. Firstly, there is no comparable EU-wide statistical data on the	Our methodological approach to the study addressed this challenge in several ways. Firstly, our preliminary literature review during the inception phase allowed us to identify relevant cross-country research which we built upon extensively during Task 2 with relevant

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

	<p>prevalence of open market traineeships. Data is not collected at the EU level on participation in open market traineeships, meaning that it is hard to reliably quantify the prevalence of traineeships in Member States, and understand which target groups are undertaking them. Several EU studies have used proxy indicators, but these do not provide a thorough scientific understanding. Data on ALMP traineeships is more readily available through ALMP participation data from Public Employment Services, yet this is not specific to traineeships, as the types of action defined do not include a separate 'traineeship' category, but rather a 'training' one, which has a broader scope than the subject of our study.</p>	<p>documentation on traineeships on the national level. However, given that this data is not available for each Member State and is not comparable across Member States, we undertook a quantitative analysis using a proxy variable to provide an estimate of traineeship prevalence across EU Member States and how this has evolved since 2014. The results of this are presented in Section 3 of the final report.</p>
<p>Diversity in regulatory approaches to traineeships across Member States</p>	<p>Linked to the challenge on data availability is the fact that regulatory approaches to traineeships in Member States hugely vary. This makes it challenging to compare the degree to which regulation in response to the QFT Recommendation has been implemented, as well as to assess compliance and enforcement.</p>	<p>To address this, the mapping included a specific legal review and analysis of the degree to which the QFT principles have been implemented into national legislation/frameworks and examined the enforcement/compliance measures in place. This was undertaken by national experts and reviewed by legal experts in each Member State and was triangulated with findings from the consultation tasks undertaken on the national level to ensure a reliable understanding of the regulatory frameworks and degree of implementation of the QFT in these frameworks for analysis of the effectiveness, relevance and efficiency of the QFT.</p>
<p>Diversity of stakeholders involved in implementing traineeships and the QFT</p>	<p>Responsibility for implementation of the QFT - in particular, its implementation into national law, enforcement and monitoring - can lie with a range of national authorities depending on the existing regulatory framework, and the structure and roles of the labour market institutions in different Member States. This means that it is not easy to identify the main interlocutor at the national level for implementation of the Recommendation.</p>	<p>We have addressed this challenge through our extensive consultation programme in which we interviewed a diversity of actors, as relevant to the specific institutional and legal setup in that country. We also fully utilised any EU-level entry points into identifying relevant national stakeholders, with the support of DG EMPL, in particular reaching out to the PES Network and the Youth Guarantee Coordinators in each Member State.</p>
<p>Gathering the views of traineeship providers</p>	<p>Implementation of the QFT also relies on traineeship providers themselves who are ultimately responsible for offering quality traineeships that abide by the principles of any QFT-related legislation in place in each Member State. Traineeships are provided by a wide range of employers and organisations—from public and private to third sector organisations.</p>	<p>Our consultation strategy involved gathering view from representative organisations of traineeship providers throughout the data collection process. We engaged with the PES on ALMP traineeships and with employer representative during our national and EU-level interview programme (Task 2.1), expert meeting (Task 2.3) and validation workshop (Task 2.4). Our labour market review (Task 2.2) allowed us to assess the types of traineeships offered by traineeship providers in the current open labour market and included traineeship opportunities in each of the main sectors of economic activity in Europe.</p>
<p>Lack of quantifiable</p>	<p>Analysis of the efficiency of the QFT is</p>	<p>We addressed this challenge throughout</p>

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

evidence on costs and benefits of QFT implementation	<p>hampered by a lack of quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. Conceptually and practically, it is extremely difficult to reliably assess the potential benefits and costs associated with QFT implementation in Member States, for several reasons:</p> <ul style="list-style-type: none"> • Benefits/costs that actors (employers, trainees, authorities) are typically aware of are those of introducing and implementing traineeships per se, rather than any additional or different benefits/costs due to adapting traineeships to QFT principles. Many stakeholders reported that costs and benefits associated with the QFT overlap with those of traineeships in general and the QFT has not led to the emergence of new types of costs or benefits. • Awareness of QFT among relevant actors on the ground is low. Thus, even where benefits/costs can be identified, actors are unlikely to attribute them appropriately to the QFT. This is particularly true in countries, where the traineeship concept is long-established, and no concrete changes have been associated with the QFT • Member States had traineeships in place prior to the QFT, often closely resembling what is called for in the QFT. Even where specific traineeship developments are in line with the QFT Recommendation, most stakeholders noted that they have not monitored their effect. Hence it is not usually possible to identify which, if any, elements of these developments and their benefits/costs would occur anyway, and which can be attributed to the QFT. • Moreover, even where the QFT has impacted on the trainee landscape, and specific developments can be accurately attributed to the QFT, their often qualitative nature (e.g., improved clarity of contractual terms, educational objectives, rights and obligations) makes it very difficult for actors to quantify associated benefits/costs. The best that can be achieved in most cases is that they can name the benefits/costs and give some qualitative assessment of their importance. 	<p>the study research tasks through the following actions:</p> <ul style="list-style-type: none"> • We adapted the case study templates and the case study interview guides to add additional questions on quantifying costs and benefits following the feedback received at interim phase. • We drafted and provided additional guidance to our national experts conducting the interviews and the case study research on how to gather costs and benefits data, in consultation with our labour economist. • We consulted regularly with our labour economist to explore all possible options for quantifying costs and benefits and ensure that the research tools were asking the right questions to gather this data. This also included suggestions on how to overcome a lack of data, through for example: <i>“If not possible to estimate costs, can you give an indication of the amount of the costs relative to a benchmark (e.g., the average salary of someone in the level of job to which the traineeship is targeted)?”</i> • We asked the question on costs and benefits to participants of the expert meeting and the validation workshop. • We followed up with EU employer organisations encouraging them to submit written input to the evaluation study, which they did and which we have used fully in the analysis of costs and benefits in the final report. <p>The evidence from the stakeholder consultations, trainee survey and case studies has been triangulated and provides a good picture of benefits and costs, mainly qualitative in nature but with quantitative indications where available and relevant.</p>
Low level of awareness of the QFT amongst stakeholders	<p>Throughout the consultation tasks, it became clear that there is a low level of awareness of the QFT amongst different relevant stakeholders, including PES, representatives from Ministries of Labour/Education, employer representatives on the national level, trade union representatives on the national level and individual traineeship providers.</p>	<p>We developed an information sheet on the QFT, explaining the objectives of the QFT, outlining the principles and the main actors involved in its implementation. This was shared with every stakeholder consulted on the EU and the national level throughout all consultation tasks.</p>

2. What was the expected outcome of the intervention?

2.1. Description of the QFT and objectives

This section describes the **expected outcome** of the QFT at the time of its adoption and outlines the socio-economic needs it was aiming to address.

The QFT²⁹ was adopted as part of a broader range of measures aiming to respond to high levels of youth unemployment and NEET levels. Ahead of its adoption, the European Commission carried out a series of scoping activities. A comprehensive study in 2012,³⁰ provided an overview of traineeship arrangements in all Member States and was followed by a 2013 Eurobarometer on the traineeship experience of EU citizens aged 18-35.³¹ The outcomes of the study and the Eurobarometer formed the basis for an Impact Assessment carried out by the European Commission,³² to evaluate what type of policy instrument would be best placed to improve the quality of traineeships in the EU.

As outlined in the intervention logic for the Recommendation (included in Annex 1), the Recommendation is driven by the increased prevalence of low-quality traineeships, including traineeships with low learning content and substandard working conditions, and by the divergence in regulatory frameworks across EU Member States which contribute, *inter alia* to a number of obstacles to cross-border traineeships. According to the 2013 Impact Assessment, by establishing a set of quality standards, the adoption of the QFT was expected to³³:

- Increase traineeship quality by ensuring the provision of a written contract, better defining the learning content, including the provision of a mentor, promoting more transparent traineeship vacancies (including greater transparency on compensation);
- Increase awareness of rights and obligations among trainees and traineeship providers;
- Ensure more coherent regulatory approaches across Member States;
- Promote an increased uptake of cross-border traineeships.

These **objectives** are then operationalised at EU and national levels. The European Commission aimed to develop a quality framework that defines quality standards for traineeships in Member States and increases transparency on traineeship practices. Member States were recommended to improve the quality of traineeships by enforcing the principles set out in the QFT.

The QFT is made up of 28 principles in total, with 22 addressed to Member States and 6 to the European Commission. The principles can be categorised into four groups, as follows:

1. **Legislative principles:** Principles on the standards and conditions of traineeships that can be implemented by Member States through national legislation/quality frameworks on traineeships;

²⁹ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014H0327\(01\)&from=en](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014H0327(01)&from=en)

³⁰ European Commission (2012), Study on a comprehensive overview of traineeship arrangements in Member States.

<https://op.europa.eu/en/publication-detail/-/publication/19623a37-37ee-4a60-b7ba-14a55526012f>

³¹ European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU.

https://data.europa.eu/data/datasets/s1091_378?locale=en

³² European Commission (2013), Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships (SWD 495). <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0495:FIN:EN:PDF>

³³ Ibid.

2. **Cross-cutting principles:** Principles for Member States on cross-border traineeships, EU funding and cooperation, that can be implemented through policy actions and cooperation across relevant actors;
3. **Principles for the European Commission:** Actions for the European Commission to support Member State efforts to apply the QFT.
4. **General application principles:** Principles calling for the general application of the QFT.

In order to ensure the comparability and understandability of the QFT, the principles were reformulated and re-numbered and, in some cases, grouped to allow for greater clarity in the research. This is set out in Figure 2. [The study numbering presented below in column 4 is the numbering used throughout this report.](#)

Figure 2. Principles set out in the Quality Framework for Traineeships

Type of principle	Definition	Topic	No. used in the study	Simplified phrasing of the principles used during the study research	Equivalent no. in the CR	Actual wording of the principles in the Recommendation
Legislative principles	Principles on traineeship standards and conditions that can be implemented in national legislation/ quality frameworks	Written agreement	1	Traineeships are based on a written agreement	2	Require that traineeships are based on a written agreement concluded at the beginning of the traineeship between the trainee and the traineeship provider;
			2	Written agreements indicate educational objectives, working conditions, whether an allowance or compensation is provided and how much, rights/obligations of all parties, duration	3	Require that traineeship agreements indicate the educational objectives, the working conditions, whether an allowance or compensation is provided to the trainee by the traineeship provider, and the rights and obligations of the parties under applicable EU and national law, as well as the duration of the traineeship, as referred to in recommendations 4-12;
		Learning and training	3	Tasks allow the trainee to work towards their learning and training objectives	4	Promote best practices as regards learning and training objectives in order to help trainees acquire practical experience and relevant skills; the tasks assigned to the trainee should enable these objectives to be attained;
			4	Traineeship providers assign a supervisor for the trainee	5	Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, monitoring and assessing his/her progress;
		Working conditions	5	Trainees' rights and working conditions under applicable law are respected including limits to max weekly working time, weekly rest periods, minimum holiday entitlements	6	Ensure that the rights and working conditions of trainees under applicable EU and national law, including limits to maximum weekly working time, minimum daily and weekly rest periods and, where applicable, minimum holiday entitlements, are respected;
					9	Encourage the concerned parties to ensure that the traineeship agreement lays down the rights and obligations of the trainee and the traineeship provider, including, where relevant, the traineeship provider's policies on confidentiality and the ownership of intellectual property rights;
			6	Traineeship providers clarify if they provide trainees with health and accident insurance and sick leave	7	Encourage traineeship providers to clarify whether they provide coverage in terms of health and accident insurance as well as sick leave;
		Transparency	7	The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount.	8	Require that the traineeship agreement clarifies whether an allowance or compensation is applicable, and if applicable, its amount;
			8	Traineeship providers include in their vacancies information on the conditions of the traineeship including information on recruitment policies	14	Encourage traineeship providers to include in their vacancy notices and advertisements information on the terms and conditions of the traineeship, in particular on whether an allowance and/or compensation and health and accident insurance are applicable; encourage traineeship providers to give information on recruitment policies, including the share of trainees recruited in recent years;
		Duration			15	Encourage employment services and other providers of career guidance, if providing information on traineeships, to apply transparency requirements;
					10	Ensure a reasonable duration of traineeships that, in principle, does not exceed six months, except in cases where a longer duration is justified, taking into account national practices;
			10	The conditions for an extension or renewal of the traineeship are clarified	11	Clarify the circumstances and conditions under which a traineeship may be extended or renewed after the initial traineeship agreement expired;
			11	The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship	12	Encourage the practice of specifying in the traineeship agreement that either the trainee or the traineeship provider may terminate it by written communication, providing advance notice of an appropriate duration in view of the length of the traineeship and relevant national practice;
		Recognition of skills	12	The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate	13	Promote the recognition and validation of the knowledge, skills and competences acquired during traineeships and encourage traineeship providers to attest them, on the basis of an assessment, through a certificate;
Cross-cutting principles	Principles on cooperation, funding and cross-border traineeships that can be implemented through policy actions and cooperation across relevant actors	Cross-border mobility	13	Member States facilitate cross-border mobility of trainees in the EU, by clarifying rules and using the EURES network	16	Facilitate the cross-border mobility of trainees in the European Union inter alia, by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities;
					17	Examine the possibility to make use of the extended EURES network and to exchange information on paid traineeships through the EURES portal;
		Use of EU funds	14	Member States make use of EU Structural and Investment Funds to increase the number and quality of traineeships	18	Make use of the European Structural and Investment Funds, namely the European Social Fund and the European Regional Development Fund, in the programming period 2014-2020, and the Youth Employment Initiative, where applicable, for increasing the number and quality of traineeships, including through effective partnerships with all relevant stakeholders;
					20	Provide information to the Commission by the end of 2015 on the measures taken in accordance with this Recommendation;
		Involvement of relevant actors	15	Member States provide information to the Commission by the end of 2015 on the measures taken in accordance with this Recommendation;	21	Promote the active involvement of social partners in applying the Quality Framework for Traineeships;
					22	Promote the active involvement of employment services, educational institutions and training providers in applying the QFT
Principles for the EC	Actions for the European Commission to support Member State efforts to apply the QFT.	Fostering cooperation	17	Foster cooperation with the Member States, the social partners and other stakeholders with a view to swiftly applying the QFT	23	Foster close cooperation with the Member States, the social partners and other stakeholders with a view to swiftly applying this Recommendation
		Monitoring and reporting	18	Monitor progress in cooperation with Member States & through EMCO	24	Monitor, in cooperation with the Member States and in particular through EMCO, the progress in applying the Quality Framework for Traineeships pursuant to this Recommendation and analyse the impact of the policies in place
			19	Report on the progress in applying the QFT on the basis of information provided by Member States	25	Report on the progress in applying this Recommendation on the basis of information provided by Member States
		Promotion of the QFT	20	Work with Member States, social partners, employment services, youth and trainee organisations and other stakeholders to promote the QFT	26	Work with Member States, the social partners, employment services, youth and trainee organisations and other stakeholders to promote this Recommendation;
			21	Promote the exchange of best practices to make use of the EU funds to increase the number and quality of traineeships	27	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;
		EURES	22	Examine, together with the Member States, the possibility to include paid traineeships in EURES, and set up a dedicated webpage on national legal frameworks for traineeships	28	Examine, together with the Member States, the possibility to include paid traineeships in EURES, and set up a dedicated webpage on national legal frameworks for traineeships.
General application	Principles calling for the general application of the QFT	General application of the QFT	-	Improve the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work by putting in practice the following principles for a Quality Framework for Traineeship	1	Improve the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work by putting in practice the following principles for a Quality Framework for Traineeship
			-	Take appropriate measures to apply the Quality Framework for Traineeships as soon as possible;	19	Take appropriate measures to apply the Quality Framework for Traineeships as soon as possible;

Source: Ecorys 2022, based on the QFT.

The achievement of the Recommendation's general, specific and operational objectives is supported through the **inputs** allocated to the intervention which can be understood as both financial and non-financial support for the development and implementation of the QFT. Hence, funding allocated, and human resources mobilised at both EU and national levels are to be considered. The inputs should support the implementation of a range of **activities** at EU level and in Member States. Member States should implement the QFT principles into national legislation/quality frameworks and establish enforcement and/or regular follow-up monitoring to verify compliance. Finally, Member States should monitor progress in applying the QFT and provide information to the European Commission on this progress. The European Commission should have a coordination role, following up on the implementation of the Recommendation, supporting exchanges of good practices between Member States to promote the use of relevant EU funding programmes and the implementation of the QFT.

Each of these activities supports the generation of immediate **outputs**, firstly in terms of (numbers of) Member States that have implemented the different QFT principles and secondly, in terms of (numbers of) traineeships and quality traineeships offered, and (numbers of) young people in quality traineeships and cross-border traineeship opportunities. The outputs are intended to lead to a series of key **results** mostly linked to the improvement of the perception of traineeships by key stakeholders and increasing the uptake of quality traineeships. Results are also expected to reflect an increase in the overall positive outcome of traineeships, quantified as (numbers of) trainees acquiring relevant skills or securing a job offer after their traineeship. The inputs, activities, outputs and results, are intended to contribute to achieving wider results aligned to a range of Union objectives. These include increasing the number of young people in quality traineeships as a means to better employability, supporting the transition from school to work, and reducing youth unemployment and NEET rates.

2.2. Points of comparison

This section examines the prevalence and quality of traineeships at the time of adoption of the QFT and the main regulatory approaches in place across EU Member States. It aims to establish a point of comparison to understand the extent to which the QFT resulted in changes as expected. The main data sources which have been used in this section are:

- European Commission (2012), Study on a comprehensive overview of traineeship arrangements in Member States.
- European Commission (2012), Analytical document accompanying the Communication from the Commission 'Towards a Quality Framework for Traineeships'
- European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU.
- European Commission (2013), Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships

2.2.1. Traineeship prevalence and quality

Comparable EU-wide data on traineeship prevalence in Europe is lacking, particularly as regards open market traineeships. Nonetheless, it is clear that at the time of the adoption of the QFT, **traineeships were a standard feature in young people's transition** from school to paid employment. The most reliable data on traineeship prevalence from that time is the representative

Eurobarometer survey of 2013.³⁴ This found that **46% of respondents aged 18 to 35 in the EU had undertaken at least one traineeship**. Other attempts to quantify the prevalence of traineeships were also made in the 2012 analytical document accompanying the Commission's Communication Towards a Quality Framework for Traineeships, which used the number of tertiary education students in the EU as a projection on the basis of assumed activity rates of 80% to arrive at an estimate of **4 to 5 million trainees per year in the EU27**. The number of cross-border traineeships remained low, with the 2013 Eurobarometer finding that only 9% of traineeships were transnational.³⁵

In terms of the **characteristics of young people undertaking traineeships**, the 2013 Eurobarometer showed that slightly more females (49%) than males (43%) had a traineeship experience.³⁶ Traineeships were also more common among those with tertiary education (60%), aged between 25-29 (50%) and 20-24 (47%) than young people with lower educational attainment.³⁷

In terms of **traineeship prevalence by sector**, the 2013 Impact Assessment³⁸ shows that open market traineeships were widespread across all sectors, with the business administration/services and the banking/accountancy sectors employing a large number of trainees, and evidence pointing towards a higher number of unpaid/low paid traineeships in the creative (e.g., culture, art, design, publishing, etc.) and media/journalism sectors. Moreover, larger, including multinational, organisations were more likely to offer traineeships than small and medium sized enterprises (SMEs).³⁹

The **quality of traineeships across Europe presented several areas for concern**, particularly in relation to working conditions, learning outcomes, and the overall contribution of traineeships towards young people's labour market integration. Table 4 provides an overview of the challenges that prompted the adoption of the QFT.

Table 4. Main challenges to quality traineeships prior to 2014

Issue	Main challenges
Learning objectives	Poor quality or lack of learning content, with 30% of trainees stating that their traineeship was unsatisfactory with regards to learning content. ⁴⁰
Working conditions	<p>Concerns around equality of access to traineeships especially for young people from disadvantaged backgrounds given commonly reported lack of pay or low pay of traineeships.⁴¹</p> <p>Lack of social security and/or health/medical insurance coverage, no entitlement to holidays, no sick or holiday pay, or pension entitlements.⁴²</p> <p>Lack of access to social protection, with the exception of traineeships as part of government sponsored programmes.⁴³</p>

³⁴ European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU. https://data.europa.eu/data/datasets/s1091_378?locale=en

³⁵ Ibid.

³⁶ Ibid.

³⁷ Ibid.

³⁸ European Commission (2012), Study on a comprehensive overview of traineeship arrangements in Member States. <https://op.europa.eu/en/publication-detail/-/publication/19623a37-37ee-4a60-b7ba-14a55526012f>

³⁹ Ibid.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² Ibid.

⁴³ European Commission (2013), Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships (SWD 495). <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0495:FIN:EN:PDF>

Labour market integration	<p>High risk of traineeships replacing regular employment, particularly in Member States with high unemployment.</p> <p>High risk that traineeships do not lead to quality employment offers with less than a third of trainees in Europe offered a work contract after the end of their traineeship.⁴⁴</p>
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Source: Flash Eurobarometer 378: the experience of traineeships in the EU (2013) and Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships (2013).

2.2.2. Regulatory approaches to traineeships

Regulatory approaches to traineeships in the EU before 2014 varied widely both depending on the type of traineeship and across Member States. While certain Member States (e.g. FR) regulated all types of traineeships by law, effectively outlawing open market traineeships, other countries (e.g. BG) did not have in place any specific legal framework regulating traineeships.⁴⁵ As seen in Table 5, in 2013, less than half of the 27 Member States at the time had legislative provisions on duration, remuneration or social protection coverage of trainee. Additionally, in 11 Member States there were still legal and administrative barriers to cross-border traineeships.⁴⁶ Even in countries where legislation on traineeships existed prior to 2014, this did not guarantee that traineeships would be of high quality, with reports highlighting instances of inadequate enforcement of regulations on open market traineeships in particular.⁴⁷

Table 5. Regulatory approaches to traineeships prior to 2014 (issues relevant to the QFT).

Issue	Regulated		
	Yes	No	Legal situation uncertain
Legislative provisions on duration of the traineeships	BE, BG, DE, EE, EL, ES, FI, FR, HU, IT, LU, MT, PT, RO, SI, SK, UK	AT, CY, CZ, DK, LV, NL, SE	IE, LT, PL
Written contract offered as common practice	AT, BE, BG, DE, DK, EE, EL, ES, FI, FR, IE, IT, LT, LV, MT, NL, PT, SI, UK	CY, LU, PL	CZ, HU, RO, SE, SK

Source: European Commission (2013), Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships (SWD 495)

⁴⁴ European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU https://data.europa.eu/data/datasets/s1091_378?locale=en

⁴⁵ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0496:FIN:EN:PDF>

⁴⁶ Ibid.

⁴⁷ European Commission (2013), Impact Assessment accompanying the proposal for a Council Recommendation on a Quality Framework for traineeships (SWD 495) <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0495:FIN:EN:PDF>

3. How has the situation evolved over the evaluation period?

This section outlines how the situation regarding traineeships has evolved since the QFT was adopted. It examines the evolution of traineeship prevalence and the characteristics of trainees and then analyses firstly, implementation of the 12 legislative principles of the QFT that can be implemented in national legislation/frameworks in Member States, secondly implementation of the QFT on the ground and thirdly, implementation of other cross-cutting principles of the QFT, and actions by the European Commission (see Figure 2). It then presents a grouping of Member States in terms of degree of implementation of the QFT since 2014.

3.1. Traineeship prevalence and quality

Estimating the prevalence of traineeships in the EU

The lack of comparable EU-wide statistical data on the prevalence of open market traineeships makes it challenging to explore in quantitative terms how traineeship prevalence has evolved over time. In light of this, the study has explored ways to *estimate* the prevalence of open market traineeships, through using proxy indicators.

As outlined in section 2, the 2012 analytical document accompanying the Commission's Communication Towards a Quality Framework for Traineeships used the number of tertiary education students in the EU as a proxy for the number of young people *available to undertake* an open market traineeship⁴⁸. This was then multiplied by an assumed activity rate of 80%, as a proxy for the number of young people that are *likely to undertake* a traineeship in the open market.

For the purposes of this study, other proxy variables were explored, with advice from the study's high-level experts on their reliability⁴⁹. We selected the same approach as the proxy used in the 2012 analytical document but with the following methodological differences:

- We have used the activity rate for *each* Member State and for the *specific age group* of 20-29 years old, whereas the 2012 estimate used an EU average *assumed* activity rate of 80%.
- In calculating the EU average, we have discounted Member States that do not offer open market traineeships (as outlined in section 3.2) in order to give a more accurate estimate than the 2012 analytical document which used EU average data.

This proxy was selected as it has the highest level of reliability, geographic coverage of all EU Member States, and fully covers the evaluation period, with annual data available from 2014 to 2020. The main methodological limitation of this proxy is the fact that not all young people who undertake open market traineeships have a tertiary education meaning that the proxy does not capture traineeships of those with lower qualifications. The data presented in this section on traineeship prevalence should be cautiously interpreted and can in no case be interpreted as hard data, but rather as an attempt to provide possible estimates regarding the prevalence of traineeships and how this has evolved over time.

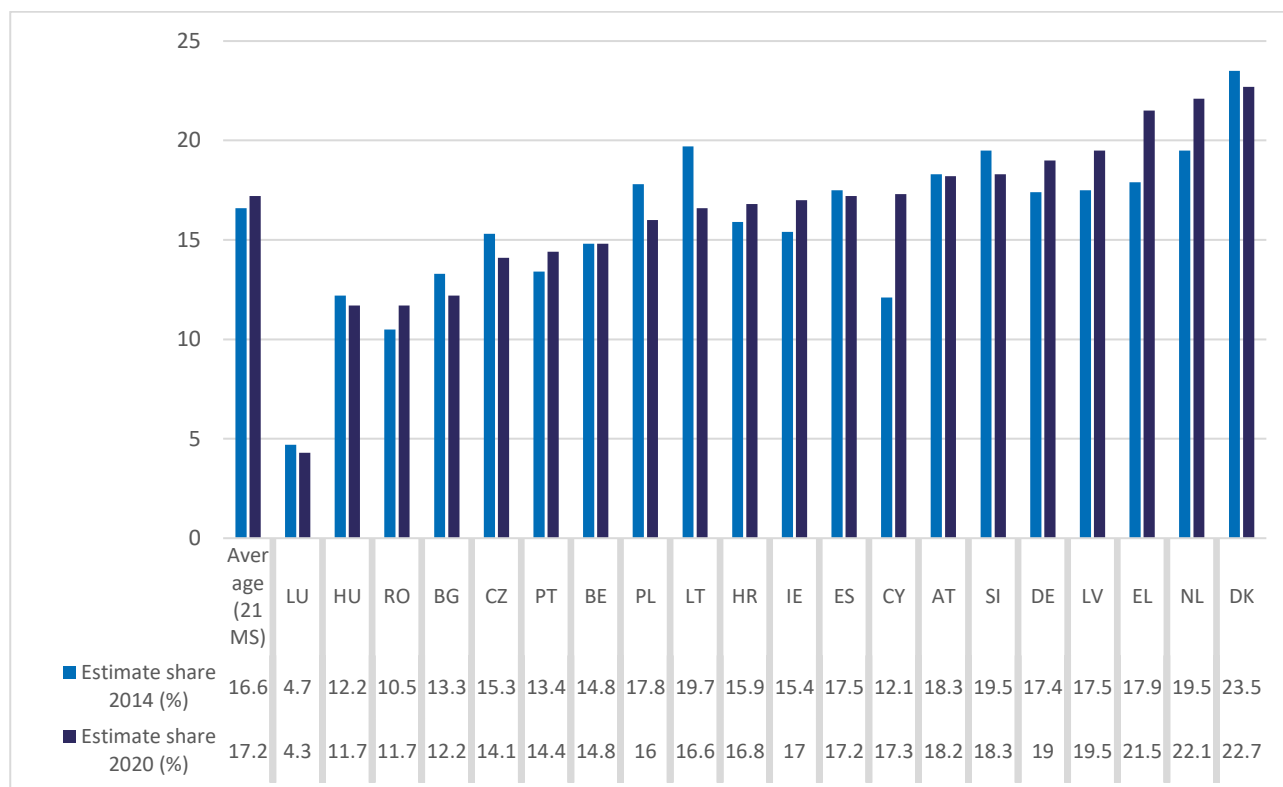
⁴⁸European Commission (2012), Analytical document accompanying the Communication from the Commission 'Towards a Quality Framework for Traineeships' <https://ec.europa.eu/social/BlobServlet?docId=9225&langId=en>

⁴⁹ These included indicators on the number of young temporary employees ([yth_empl_050]: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=yth_empl_050&lang=en); a one-off indicator collected in 2016 on Population by sex, age, educational attainment level and work experience while studying from 2016 [LFSO_16WORKEXP]: https://ec.europa.eu/eurostat/databrowser/view/lfs_16workexp/default/table?lang=en and the TEMPREAS labour force survey variable.

Based on the proxy outlined above, the **average share** of young people aged 20-29 years old estimated to be undertaking an open market traineeship in the 21 Member States that offer open market traineeships **increased from 16.6% in 2014 to 17.2% in 2020**.⁵⁰ Increases can be seen in nine of the 21 EU Member States (Figure 3). The biggest percentage increase was in Cyprus (over 40%) whilst on the other hand, decreases of over 10% were seen in Lithuania and Poland.

However, the **number** of young people estimated to be undertaking an open market traineeship in the 20 Member States that offer this type of traineeships **decreased by 3.3%** in this time period. This number was 6.06 million young people in 2014 and decreased to 5.85 million young people in 2020⁵¹. This is due principally to a decrease in the number of 20–29-year-olds in that time.

Figure 3. Estimated share of young people (aged 20-29 years) undertaking an open market traineeship by EU Member State, 2014 and 2020, ordered by 2020 values from low to high

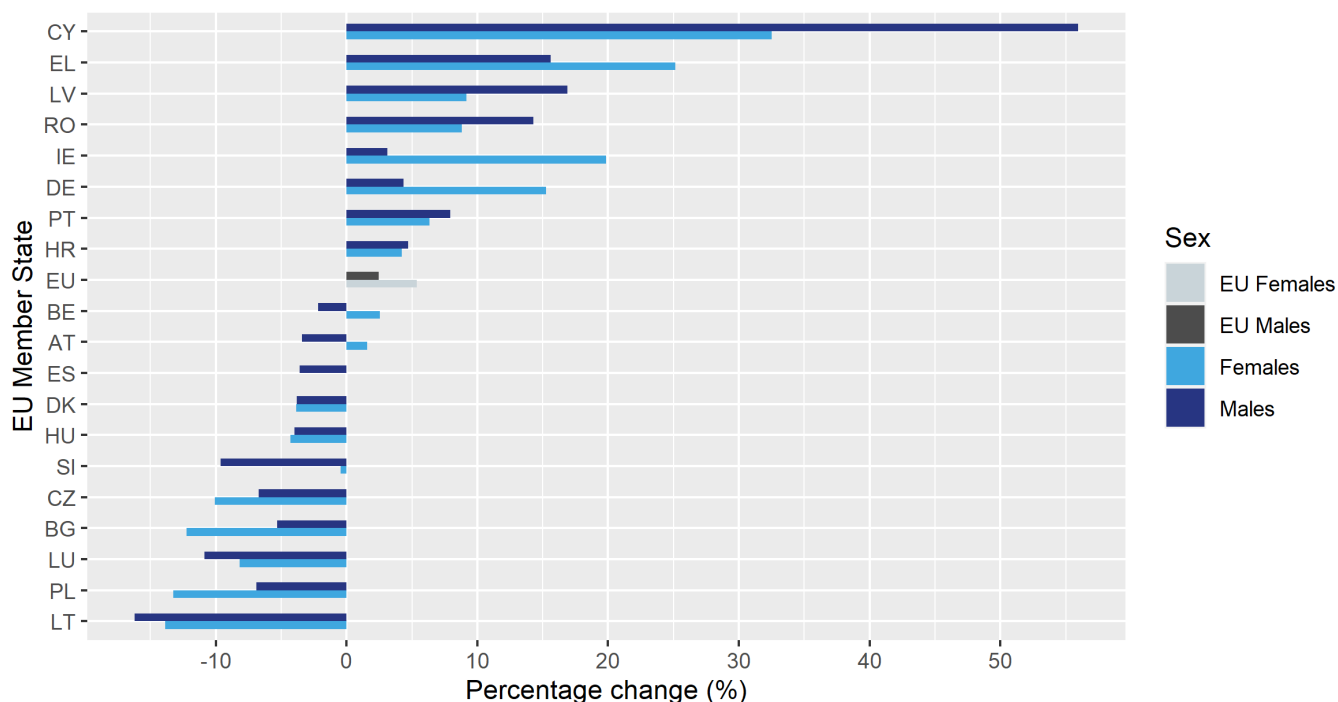


Sources: Data on the number of students aged 20-29 who are enrolled in tertiary education [educ_uoe_enrt02]: http://appsso.eurostat.ec.europa.eu/nui/show.do?wai=true&dataset=educ_uoe_enrt02. Data on the activity rate of young people aged 20-29 [lfsa_argan]: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfsa_argan&lang=en. Data on the total number of young people aged 20-29 [DEMO_R_PJANGROUP]: https://ec.europa.eu/eurostat/databrowser/view/DEMO_R_PJANGROUP__custom_3472917/default/table?lang=en

⁵⁰ Data on the number of students aged 20-29 who are enrolled in tertiary education [educ_uoe_enrt02] was sourced from: http://appsso.eurostat.ec.europa.eu/nui/show.do?wai=true&dataset=educ_uoe_enrt02. Data on the activity rate of young people aged 20-29 [lfsa_argan] was sourced from: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfsa_argan&lang=en and data on the total number of young people aged 20-29 [DEMO_R_PJANGROUP] was sourced from: https://ec.europa.eu/eurostat/databrowser/view/DEMO_R_PJANGROUP__custom_3472917/default/table?lang=en

⁵¹ Sources: Data on the number of students aged 20-29 who are enrolled in tertiary education [educ_uoe_enrt02]: http://appsso.eurostat.ec.europa.eu/nui/show.do?wai=true&dataset=educ_uoe_enrt02. Data on the activity rate of young people aged 20-29 [lfsa_argan]: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfsa_argan&lang=en.

Figure 4. Percentage change in the estimated share of young people (aged 20-29 years) undertaking an open market traineeship by EU Member State, ordered by overall average % change.



Sources: Data on the number of students aged 20-29 who are enrolled in tertiary education [educ_uoe_enrt02] was sourced from: http://appsso.eurostat.ec.europa.eu/nui/show.do?wai=true&dataset=educ_uoe_enrt02. Data on the activity rate of young people aged 20-29 [lfsa_argan] was sourced from: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfsa_argan&lang=en and data on the total number of young people aged 20-29 [DEMO_R_PJANGROUP] was sourced from: https://ec.europa.eu/eurostat/databrowser/view/DEMO_R_PJANGROUP_custom_3472917/default/table?lang=en

The estimates calculated through the proxy indicator were then combined with data collected in other tasks of the study, namely, the survey of trainees, the mapping research, the interviews and the case studies, in order to shed light on how the characteristic of trainees as well as the prevalence of trainees across sectors have evolved during the evaluation period.

Overall, there has been **no significant change in the characteristics of trainees or in the prevalence of traineeships across sectors** between 2014 and 2020.

Women are still more likely than men to undertake an open market traineeship. As outlined in Section 2, in 2013, slightly more female respondents to the Eurobarometer survey (49%) than male respondents (43%) had had a traineeship experience.⁵² The survey of trainees undertaken for this study, whilst not directly comparable, does show that this trend has broadly remained in place: 66% of respondents who completed one traineeship after finalising their education were women compared to 33% men. This gender disparity is also seen in the estimates of prevalence of traineeships outlined above where the number of estimated females undertaking a traineeship has been consistently higher than males in the majority of EU Member States.⁵³ This difference is also reflected in survey respondents that had not done a traineeship: when asked about their

⁵² European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU, p. 10 https://data.europa.eu/data/datasets/s1091_378?locale=en

⁵³ Data on the number of students aged 20-29 who are enrolled in tertiary education [educ_uoe_enrt02] was sourced from: http://appsso.eurostat.ec.europa.eu/nui/show.do?wai=true&dataset=educ_uoe_enrt02 and data on the activity rate of young people aged 20-29 [lfsa_argan] was sourced from: https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=lfsa_argan&lang=en.

willingness to undertake a traineeship, the majority of respondents that had not done a traineeship but were interested in doing so in the future were female (62%), compared to just 36% identifying as male.

Individuals with tertiary education are still more likely than those with lower qualifications levels to undertake an open market traineeship. As outlined in section 2, in 2013, traineeships were more common among those with tertiary education (60%) as well as among those who were aged between 25-29 (50%) and 20-24 (47%).⁵⁴ This general trend has remained largely in place according to the survey of trainees. The survey shows that the majority of respondents (53%) had tertiary educational attainment when undertaking their traineeship, 31% had an upper secondary degree, while 7% obtained a vocational secondary degree.⁵⁵

As for the **age of trainees**, respondents to the survey of trainees are more likely to undertake a traineeship after completing their education, meaning that they would be approximately in their mid-twenties, which is in accordance with the 2013 findings.

Individuals with lower educational attainment levels and who face more obstacles to accessing the labour market are more likely to undertake an ALMP traineeship. This is to be expected given that ALMP traineeships tend to target young people that are unemployed or inactive and/or belong to socially marginalized and disadvantaged groups. For example, as identified by the desk research and the interviews for this study:

- In **Sweden**, in 2021, 55% of trainees participating in ALMP traineeships were born outside of Sweden, with a high percentage of those (33%) having less than upper secondary school.⁵⁶
- In **France**, young people from priority neighbourhoods (*Quartier prioritaire de la ville*) or a sensitive urban area (*Zone urbaine sensible*) represented 24% of the Youth Guarantee traineeship beneficiaries (ALMP traineeships supporting young people in France), with 7% having a foreign nationality between 2013 and 2018.⁵⁷
- In **Italy**, one in 10 had a foreign citizenship (163,000 individuals), mostly with origins from non-EU countries (more than 80%). The share of vulnerable people (people with disabilities, disadvantaged people or people taken care of by social or health services) represented around 13% of total ALMP traineeships from 2014 to 2019 in Italy.

In terms of sectoral differences, the survey of trainees shows that traineeships are relatively widespread across all sectors, as was the case before the QFT was adopted (see more details on the 2013 breakdown in 2.2.1 Traineeship prevalence and quality above).

- The largest share of trainee respondents (20%) undertook a traineeship in the public sector with the smallest share of respondents completing their traineeship in the health and social work (10%), professional, scientific, and technical activities (10%) and education (9%).
- Less than 5% of traineeship providers were in the construction (4%) and the agriculture, forestry & fishing sectors (2%).
- The trainee survey did find however that most trainees undertook their traineeship in small and medium sized enterprises - medium (50%, 478 out of 956) or small size companies (24%, 229 out of 956), as opposed to large employers (17%, 162 out of 956). This is in contrast to the findings of the 2012 Study on a comprehensive overview of traineeship arrangements in Member States which outlined that larger, including multinational, organisations were more

⁵⁴ Ibid.

⁵⁵ In addition, lower secondary education level had 6% and vocational tertiary level degree 3% of survey respondents.

⁵⁶ Data provided by the Swedish Public Employment Service (*Arbetsförmedlingen*) upon request for this study

⁵⁷ Dares (2018). La garantie jeunes: quels jeunes et quel bilan après cinq ans ? : https://dares.travail-emploi.gouv.fr/sites/default/files/pdf/dares_analyses_garantie_jeunes_bilan.pdf

likely to offer traineeships than small and medium sized enterprises (SMEs), as outlined in section 2.2.1.⁵⁸ However, given the much greater prevalence of small and medium enterprises in European economies, and the fact that the trainee survey was not controlled for company size, this is not surprising, and it could still be the case that larger firms are more likely to offer traineeships (as found by the 2013 Eurobarometer survey).

Examples of the prevalence of traineeships

Bulgaria

An amendment to the Labour Code in 2014 transposed most of the QFT principles regarding open market traineeships, which might have increased their popularity. There was an increase in the number of registered traineeship contracts in the years 2015 and 2016 immediately following the Labour Code amendment (1,956 and 2,102 respectively). A decline in the number of traineeship contracts is observed between 2017 (1,201) and 2019 (1,038) which became more pronounced in 2020 (830) and 2021 (715) due partly (but not exclusively) to the effects of the Covid-19 pandemic.

Lithuania

During 2015-2017, the number of persons participating in open market traineeship was on average 1,500 per year, and it has increased during 2018-2020 to around 2,000 per year. Stakeholders interviewed suggested that this might be due to increased awareness amongst potential trainees of the measure as well as increased take-up of traineeship providers as they become more familiar with the measure. Open market traineeships are more prevalent in the financial sector (banks) and health care (hospitals) (data provided by the Ministry of Social Security and Labour upon special request).

Spain

According to the national PES (SEPE) data on contracts, traineeship contracts (for those aged 16-29) increased between 2014 (55,665) and 2018 (95,804), but dropped to 72,174 in 2019, 44,000 in 2020 increasing again to 70,000 in 2021. In 2021, the traineeship contracts (all ages, no age detail at sectoral level available) were signed 30,672 times (one person may sign more than one contract in one year), 92% of which in services (namely in NACE Public administration, defence and social security and Education, hospitality and commerce).

Public debate on traineeships is less pronounced than it was in 2014, but attention on the issue has increased since the pandemic. At the EU and national level, political discussions on the quality and role of traineeships prior to the adoption of the QFT were prominent, linked principally to the high unemployment rates of young people in Europe at the time. Trade unions and youth organisations in particular called for action to regulate traineeships, to ensure quality in terms of learning content, working conditions and labour protection (including remuneration), at both the EU and the national level⁵⁹. Since 2014, the issue has received attention intermittently and in the broader context of youth employment and (mis)alignment between skills and labour market needs. Traineeships are still identified as one of the instruments to mitigate these broader issues. The consultations⁶⁰ conducted for this study show that trade unions are concerned with the dominance of unpaid open market traineeships and the low level of working conditions for trainees; whilst employers focus on defining the trainee as a learner and ensuring better alignment between workers' skills and their vacancy needs.

More recently, **attention has increased on traineeships specifically on the issue of remuneration – or lack thereof – of trainees.** The European Parliamentary Research Service (EPRS) highlights how in the years since the adoption of the QFT, *“policy on traineeships has moved from initial concerns about the availability of quality offers to concentrating increasingly on*

⁵⁸ European Commission (2012), Study on a comprehensive overview of traineeship arrangements in Member States <https://op.europa.eu/en/publication-detail/-/publication/19623a37-37ee-4a60-b7ba-14a55526012f>

⁵⁹ See for example <https://www.youthforum.org/files/European20Quality20Charter.pdf>

⁶⁰ Targeted interviews, case studies and online expert meeting.

*working conditions (including remuneration)*⁶¹. A 2020 European Parliament resolution condemned the practice of unpaid internships and called for a legal instrument to ensure fair remuneration,⁶² and another resolution adopted in 2022 called the European Commission and Member States to propose a common legal framework to ensure fair remuneration for traineeships in order to avoid exploitative practices.⁶³ Lastly, a call to ban unpaid internships was included among the 49 proposals identified as the outcome of the Conference on the Future of Europe.⁶⁴

At the national level, views differ depending on the specific country context. In Member States where national frameworks and regulations have been adopted, debates around traineeship quality have been more prominent since 2014 (e.g., ES, IT, RO), focusing on the need to protect trainees, including by introducing new legal guarantees to reduce and prevent the misuse of traineeships (see box below).

Examples of the public discussion on traineeships at the national level

In **Italy**, the national legislative framework for traineeships is planned to be reformed, sparking a renewed interest in the topic, principally as a result of increasing numbers of traineeships.⁶⁵ Youth organisations and other stakeholders have been focusing on the topic, demanding new legal guarantees to reduce and prevent misuse of traineeships.

In **Spain**, a labour market reform that entered into force in March 2022⁶⁶ brings traineeship provisions closer to QFT principles and has brought the topic into the limelight (e.g. reducing the length of contracts, making the supervisor mandatory, increasing the role of individual training plans and increasing sanctions in the case of traineeship contract misuse).⁶⁷ These recent changes aim to reinforce traineeships and increase employability of young people, while acknowledging a better need to protect trainees and reduce misuse of traineeship contracts.

In **Romania**, there is an ongoing public consultation on how to revise the traineeship law to improve its implementation.

The **Estonian** Employers' Confederation is organising competitions for the best traineeship provider and the best trainee to improve the reputation of traineeships.

3.2. Degree of implementation of the QFT

As the QFT is a reference framework designed to be implemented into national legislation in Member States, assessing the degree of implementation of the QFT involves examining several interconnected aspects. This section presents the results of this assessment, based on assessment of the following three aspects of implementation:

- 1. Implementation of the QFT in national legislation/frameworks:** this examines the extent to which the QFT legislative principles (principles 1-12, Figure 2) are enshrined in national legislation/frameworks in each Member State and which regulatory approach overall is used for each type of traineeship.

⁶¹ European Parliamentary Research Service (2022), The quality of traineeships in the EU.

[https://www.europarl.europa.eu/RegData/etudes/STUD/2022/699459/EPRS_STU\(2022\)699459_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/699459/EPRS_STU(2022)699459_EN.pdf)

⁶² <https://www.europarl.europa.eu/news/en/press-room/20201002IPR88443/parliament-calls-on-member-states-to-fully-exploit-the-european-youth-guarantee>

⁶³ https://www.europarl.europa.eu/doceo/document/B-9-2022-0091_EN.html

⁶⁴ <https://futureu.europa.eu/pages/reporting>

⁶⁵ The reform should have been adopted by June 2022, but there have been delays and the reform has not been implemented yet.

https://www.corriere.it/economia/lavoro/22_agosto_18/tirocini-extracurriculari-curriculari-stop-riforme-la-crisi-governo-4228b968-1e2f-11ed-9975-12e1519ef887.shtml?refresh_ce-cp

⁶⁶ <http://spanish.vlexblog.com/especial-reforma-laboral-2022/>

⁶⁷ Some of these provisions go beyond the QFT, but the discussion is still relevant to the QFT in a wider context.

2. **Implementation of the QFT principles on the ground:** this examines the extent to which the QFT legislative principles (principles 1-12, Figure 2) and the QFT overall is actually in place on the ground i.e., the extent to which the principles of the QFT are abided by by traineeship providers in the traineeships that they offer.
3. **Implementation of other principles of the QFT:** this examines the extent to which the cross-cutting principles of the QFT for Member States (principles 13 -16, Figure 2) and the principles for the European Commission (principles 17 – 22, Figure 2) are implemented.

The table below presents an outline of the main evidence base and the principles assessed in each of the above three aspects of implementation. Full details on the methodological approach are included in Annex 1.

Table 6. Overview of methodology for assessment of implementation of the QFT

Aspect of implementation of the QFT	Sub-aspect	Principles assessed (study numbering - cf. Figure 2)	Main evidence base
Implementation of the QFT in national legislation/frameworks	Regulatory approach	1 to 12	<ul style="list-style-type: none"> Mapping (desk research, national interviews) National and legal expert assessment
	Degree of implementation by principle		
Implementation of the QFT principles on the ground		1 to 12	<ul style="list-style-type: none"> Traineeship vacancy review
		QFT as a whole	<ul style="list-style-type: none"> Desk research and national interviews, specifically on obstacles for traineeship providers and impact of traineeships on trainees National expert assessment Survey of trainees
Implementation of other principles of the QFT	Cross-border mobility	13	<ul style="list-style-type: none"> Desk research National and EU level interviews Expert meeting Validation workshop
	Use of EU funds	14	
	Involvement of relevant actors	15 to 16	
	Actions by the European Commission	17 to 22	

Source: Ecorys, 2022

3.2.1. Implementation of the QFT in national legislation

Regulatory approaches to traineeships

The assessment of implementation of the QFT in national legislation first identified the main regulatory approaches to both ALMP traineeships and open market traineeships in Member States. The following three approaches are used to regulate traineeships:

- Traineeships are regulated by **specific legislative measures** either in the Labour Code or in separate dedicated instruments;
- Traineeships are regulated, to varying degrees, by **general labour legislation**, applicable to any employment relationship;

- Traineeships are **not regulated at all**, either due to the fact that generally such a form of traineeship is not commonly used in practice (open market traineeships) or because traineeships (ALMP traineeships) are covered by contractual frameworks and operational guidelines of the PES as opposed to legislation.

Table 7 shows the approaches taken in each Member State, for each type of traineeship.

Table 7. Regulatory approaches to traineeships in EU Member States

Regulatory approach	ALMP traineeships	Open market traineeships
Specific legal measures in the labour code or in dedicated instruments	AT, BG, BE, DE, DK, EL, EE, ES, FI, FR, HR, IT, LT, LU, MT, PL, PT, RO, SK, SI, SE (21 MS)	BE, BG, DE, ES, LU, LT, RO, PL, PT, SI (10 MS)
General labour legislation	CZ, HU, LV, NL (4 MS)	AT, CZ, DK, EL, HR, HU, IE, LV, NL, (9 MS)
No regulation	CY, IE (2 MS)	CY (1 MS)
Type of traineeship does not exist in the country	-	EE, FR, FI, IT, MT, SE SK (7 MS)

Source: Ecorys, 2022

The table shows there is still a wide diversity of regulatory approaches to traineeships present across the EU27. ALMP traineeships are more coherently regulated across the EU, with most Member States using specific legislation to do so. Regulatory approaches to open market traineeships on the other hand remain diverse, with no clear trends evident.

Implementation of the principles of the QFT in national legislation

The assessment of the implementation of the QFT in national legislation/frameworks was then undertaken by Member State, and by principle. The results of this assessment are presented in Table 8 (for open market traineeships) and Table 9 (for ALMP traineeships) below.

Table 8. Implementation in national legislation per principle of the QFT: Open market traineeships

Member State	Degree of legal implementation overall	Traineeships based on written agreement	Written agreements indicate educational objectives, working conditions, if compensation provided and how much, rights/obligations of all parties, duration	Tasks allow the trainee to work towards their learning and training objectives	Traineeship providers assign a supervisor for the trainee	Trainees' rights and working conditions are respected including - limits to max weekly working time, weekly rest periods, minimum holiday entitlements	Traineeship providers clarify if they provide trainees with: - health and accident insurance - sick leave	The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount.	The duration of the traineeship does not exceed six months, except when justified.	The conditions for an extension or renewal of the traineeship are clarified.	The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship	The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate.	Traineeship providers include in their vacancies information on the conditions of the traineeship.
AT		✓	✗	✗	✗	✓	✓	✓	✗	✓	✓	✗	✓
BE		✓	✓(partially)	✓	✓	✓	✓	✓	✓	n/a	✓(partially)	✗	✓
BG		✓	✓	✓	✓	✓	✓	✓	✗	✓	✓	✓(partially)	✗
CY		✓	✓(partially)	✗	✓	?	?	?	?	?	?	n/a	✓(partially)
CZ		✓	✓	✓(partially)	✓	✓	✓	✓	✓	✓	✓	✗	✓
DE		✓	✓	✓(partially)	✗	✓	✓	✓	✗	✗	✓(partially)	✓(partially)	✗
DK		✗	✗	✗	✓	✓	✗	✗	✗	✗	✗	✗	✗
EE		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
EL		✗	✓(partially)	✓(partially)	n/a	✓(partially)	✗	✓(partially)	n/a	✗	✗	n/a	✓(partially)
ES		✓	✓	✓	✓	✓	✓	✓	✗	✓	✓	✓	✗
FI		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
FR		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
HR		✓	✓	✓(partially)	✓(partially)	n/a	n/a	n/a	✓(partially)	n/a	n/a	n/a	✗
HU		✓	✓(partially)	✗	✓	✓(partially)	✓	✓(partially)	✓(partially)	✓(partially)	✓	✗	✓
IE		✗	✗	✗	✗	✓	✗	✓	✗	✗	✗	✗	✗
IT		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
LT		✓(partially)	✓	✓	✓	✓(partially)	✓(partially)	✓	✓	✓(partially)	✓	✓	✓(partially)
LU		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
LV		✓	✓(partially)	n/a	n/a	✓	n/a	n/a	n/a	n/a	✓	n/a	n/a
MT		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
NL		✓(partially)	✓(partially)	?	✓	✓(partially)	✓(partially)	✓(partially)	✓(partially)	✓	?	?	?
PL		✓	✓(partially)	✗	✗	✓(partially)	✓(partially)	✓	✓	✓(partially)	✓	✓	✓
PT		✓	✓	✓(partially)	✓	✓	✓	✓	✗	✓(partially)	✓(partially)	✓(partially)	✗
RO		✓	✓	✓(partially)	✓	✓	✓	✓	✓	✓(partially)	✓(partially)	✓(partially)	✓
SE		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
SI		✓	✓	✓	✓	✓	✓	✓	✓(partially)	✓	✓	✓	n/a
SK		n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
✓	Implemented	17	17	12	14	18	14	16	10	12	14	9	10
✗	Not implemented	3	3	6	4	0	3	1	7	4	3	6	7
?	Information not available to make an assessment	0	0	1	0	1	1	1	1	1	2	1	1
n/a	Principle not applicable	7	7	8	9	8	9	9	9	10	8	11	9
	Total	27	27	27	27	27	27	27	27	27	27	27	27

Source Ecorys, 2022

Table 9. Implementation in national legislation by principle of the QFT: ALMP traineeships

Member State	Degree of legal implementation overall	Traineeships based on written agreement	Written agreements indicate educational objectives, working conditions, if compensation provided and how much, rights/obligations of all parties, duration	Tasks allow the trainee to work towards their learning and training objectives	Traineeship providers assign a supervisor for the trainee	Trainees' rights and working conditions are respected including - limits to max weekly working time, weekly rest periods, minimum holiday entitlements	Traineeship providers clarify if they provide trainees with: - health and accident insurance - sick leave	The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount.	The duration of the traineeship does not exceed six months, except when justified.	The conditions for an extension or renewal of the traineeship are clarified.	The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship	The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate.	Traineeship providers include in their vacancies information on the conditions of the traineeship.
AT		✓	✓	✓	✗	✓	✓	✓	✓	✓	✓	✓	✓
BE		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
BG		✓	✓	✓	✗	✓	✓	✓	✗	✓	✓	✗	✓
CY		✓	✓	✓ (partially)	✓	✓	✓	✓	✓	✓	✗	✓	✓ (partially)
CZ		✓	✓	✓ (partially)	✓	✓	✓	✓	✓	✓	✓	✓ (partially)	✓
DE		✓	✓	✓	✗	✓	✓	✓	✓	✓	✓ (partially)	✓ (partially)	✗
DK		✓	✓	✓	✓ (partially)	✓ (partially)	?	?	✓	✓ (partially)	✓ (partially)	✗	✗
EE		✓	✓ (partially)	✓ (partially)	✓	✓	✓	✓	✓	n/a	n/a	✗	n/a
EL		✓	✓	✓	✓	✓	✓	✓	✓	✗	✗	✓ (partially)	✓ (partially)
ES		✓	✓	✓	✓	✓	✓	✓	✗	✓	✗	✓	✗
FI		✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✗	✓
FR		✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✓ (partially)	✓
HR		✓	✓	✓	✓	✓	✓	✓	✓ (partially)	n/a	✓	✓ (partially)	✓
HU		✓	✓ (partially)	✗	✓	✓	✓	✓	✓ (partially)	✓ (partially)	✓	✗	✓ (partially)
IE		✓	✓	✓	✓	✓	✓ (partially)	✓	✗	✓	✓	✓	✗
IT		✓	✓	✓	✓	✓	✓	✓	✗	✓	✓	✓	✗
LT		✓	✓	✓	✓	✓	✓	✓	✓	✓ (partially)	✓	✓	✓ (partially)
LU		✓	✓	✓	✓	✓	✓	✓	✗	✓	✓	✓	✓
LV		✓	✓	✓	✓	✓	✓	✗	✓	✓	✓	✗	✗
MT		✓	✓	✓	✓ (partially)	✓	✓ (partially)	✓	✓ (partially)	n/a	✓ (partially)	✓	✓ (partially)
NL		✓ (partially)	✓ (partially)	?	✓	✓ (partially)	✓ (partially)	✓ (partially)	✓ (partially)	✓	?	?	?
PL		✓	✓	✓ (partially)	✓	✓	✓	✓	✗	✓	✓	✓	✓
PT		✓	✓	✓	✓	✓	✓	✓	✗	✓	✓ (partially)	✓	✓ (partially)
RO		✓	✓	✓ (partially)	✓	✓	✓	✓ (partially)	✓	✓	✓	✓	✓ (partially)
SE		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗
SI		✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✗	✗
SK		✓	✓	✓	✓ (partially)	✓	✓	✓	✓	✓	✓	✓ (partially)	✗
✓	Implemented	27	27	25	24	27	26	24	20	23	20	19	16
✗	Not implemented	0	0	1	3	0	0	1	7	1	5	7	9
?	Information not available to make an assessment	0	0	1	0	0	1	1	0	0	1	1	1
n/a	Principle not applicable	0	0	0	0	0	0	1	0	3	1	0	1
	Total	27	27	27	27	27	27	27	27	27	27	27	27

Source: Ecorys, 2022

As can be seen in the tables above, the principles of the QFT on the written agreement, its content, and the respect of rights and working conditions of trainees are the principles that are most implemented in national legislation across Member States. This is the case for both ALMP and open market traineeship legislation.

On the other hand, the principles on transparency requirements (i.e., including information in the vacancy notice), alignment of tasks with learning objectives, certification of the traineeship and the duration of the traineeship are the QFT principles that are least implemented in national legal frameworks in Member States, with this trend in place for both open market and ALMP traineeship regulation.

A more detailed analysis of the implementation of each principle is included in Annex 2.

Overall assessment of degree of implementation of the QFT in national legislation

The results of implementation by principle and by Member State were then synthesised to come to an overall assessment of degree of implementation of the QFT in national legislation according to the following scoring system:

- **Fully/mostly implemented:** 10 or more principles out of 12 implemented in national legislation
- **Partially implemented:** 6 to 9 principles out of 12 implemented in national legislation
- **Modestly implemented:** 3 to 5 principles out of 12 implemented in national legislation
- **Not implemented:** 2 or fewer principles out of 12 implemented in national legislation
- **Not applicable:** if none of the QFT's principles are implemented because this type of traineeship does not exist (or is very rare) in the country.

The table below shows the degree of implementation of the QFT principles at the time of the study (Q4 2021) in national legislation in each Member State, and for each type of traineeship. The table shows that there is a generally high degree of implementation of the QFT in national legislation for ALMP traineeships and a more modest degree of implementation in open market traineeships.

Table 10. Degree of implementation of the QFT principles in national legislation

Degree of implementation of the QFT principles in national legislation	ALMP traineeships	Open market traineeships
Fully/mostly implemented	AT, BE, BG, ES, FI, FR, HR, IE, IT, LT, LU, MT, PL, PT, RO, SE, SI, SK (18 MS)	BE, BG, ES, LT, LU, RO, SI (7 MS)
Partially implemented	CY, CZ, DE, DK, EE, EL, HU, LV, NL (9 MS)	AT, CZ, DE, HU, NL, PL, PT (7 MS)
Modestly implemented		CY, EL, HR, IE, LV (5 MS)
Not implemented		DK (1 MS)
Not applicable		EE, FI, FR, IT, MT, SE, SK (7 MS)

Source: Ecorys 2022

The following sections outline the state of play for each type of traineeship.

ALMP traineeships

- **Fully/mostly implemented:** The QFT principles are fully or mostly implemented in national legislation governing ALMP traineeships in **18 Member States**. In **Lithuania**, the majority of principles under the QFT have been implemented through revisions of the national legal framework, with the exception of vacancy notices, clear definition of health and accident insurance coverage as well as the right to sick leave. In **Luxembourg**, the basic principles of the QFT are integrated, except for the duration and some parts of effective enforcement. While **Finland** does not consider its system to be based on the QFT, in effect and for all practical purposes the QFT principles are implemented in its legislation. For example, the work try-out programme describes in detail whether the trainee is entitled to an allowance or compensation, and the amount. In **Italy** and **Romania**, Member States with a high degree of implementation of the principles of the QFT, new reforms have just taken place (IT) or are expected to take place in the foreseeable future (RO) to ensure a higher degree of implementation.
- **Partially implemented:** The QFT principles are partially implemented in national legislation governing on ALMP traineeships in **nine Member States**. Generally speaking, the QFT principles are implemented to a certain degree by the existing, and in some cases general, labour legislation (e.g., Labour Law/Labour Code). This was for example found to be the case in **Hungary** or **Cyprus**.
- **Modestly implemented and not implemented:** There are **no Member States** that have only modestly implemented or not at all implemented the QFT principles in national legislation governing ALMP traineeships.

Open market traineeships

- **Fully/mostly implemented:** The QFT principles are fully or mostly implemented in national legislation for open market traineeships in **seven Member States**. This is the case in Luxembourg, for example, where a law introduced in 2020 was specifically put in place in accordance with the QFT, and all principles were included.
- **Partially implemented:** The QFT principles are partially implemented in national legislation for open market traineeships in **seven Member States**. For example, in Czech Republic and Hungary, where while open market traineeships are not specifically regulated, some principles are implemented via general labour legislation, applicable to any kind of employment relationships.
- **Modestly implemented:** The QFT principles are modestly implemented in national legislation for open market traineeships in **five Member States** as their respective legislations have implemented only a few QFT principles (CY, EL, HR, IE, LV). In Cyprus, the reason cited for this is that open market traineeships are not common, although they do exist.
- **Not implemented:** The QFT principles are not implemented in legislation in **one Member State**, Denmark. This is because the general labour law provisions are considered to cover traineeships; however, only two QFT principles are implemented in this law.
- **Not applicable:** The QFT principles are not applicable in legislation of **seven Member States** with regard to open market traineeships (EE, FI, FR, IT, MT, SE, SK), because open market traineeships are not common in practice. In the case of Italy and France in particular, open market traineeships are expressly forbidden by national law.

3.2.2. Implementation of the QFT on the ground

In order to assess the extent to which the QFT is **practically applied** in traineeships taking place in the country, we then examined implementation on the ground. For this assessment, a wide evidence base has been used and triangulated, as follows:

- Firstly, an analysis of a representative sample of **traineeship vacancies** of open market and ALMP traineeships in each EU Member State with regard to their compliance with the 12 legislative principles of the QFT. This has allowed us to understand to what extent traineeship providers include specific information in their traineeship offers on elements called for by the QFT.
- Secondly, evidence of **obstacles experienced by traineeship providers** (employers, PES) and other actors involved in implementation on the ground of traineeships in general (e.g., national authorities) as identified through desk research and national interviews. This has allowed us to understand the degree to which traineeship providers are able to offer quality traineeships in line with the QFT. The assumption is that a high degree of obstacles is likely to translate into a lower number of quality traineeships in line with the QFT offered by traineeship providers, and thus a lower degree of implementation of the QFT on the ground, and vice versa.
- Thirdly, evidence of the **impact of the QFT on trainees**, as identified through the trainee survey, desk research and interviews. The assumption is that evidence of positive impact of traineeships on trainees can be partly understood as resulting from a high degree of implementation of the principles of the QFT in traineeships taking place in Member States, and thus a high degree of implementation of the QFT on the ground.
- Fourthly, an **expert assessment** of the overall degree of implementation on the ground from national experts in each Member State.

This research was triangulated to lead to an assessment of overall degree of implementation of the QFT on the ground, based on the following scoring system. The full methodology for this assessment is outlined in Annex 1⁶⁸:

- **High implementation on the ground:** Vacancies reviewed in the country show a high degree of alignment with the QFT legislative principles; there is a lack of obstacles to QFT implementation on the ground, and there is evidence of positive QFT impact on trainees and society
- **Moderate implementation on the ground:** Vacancies reviewed in the country show a moderate or low degree of alignment with the QFT legislative principles; there are some obstacles to QFT implementation on the ground, but there is evidence of positive QFT impact on trainees and society
- **Low implementation on the ground:** Vacancies reviewed in the country show a moderate or low degree of alignment with the QFT legislative principles; there are some obstacles to QFT implementation on the ground, and there is weak evidence of positive QFT impact on trainees and society
- **Very low implementation on the ground:** Vacancies reviewed in the country show a low degree of alignment with the QFT legislative principles, there is evidence of major obstacles to QFT implementation on the ground, and there is evidence of low or negative QFT impact on trainees and society.

⁶⁸ The full range of data used to come to this final assessment is included in Annex 2 of this report.

- **Not applicable:** if the law forbids a particular type of traineeship or if this type of traineeship does not exist/is very rare in the country.

The overall degree of implementation of the QFT on the ground is pictured in Table 11. It shows that across EU Member States, **the principles of the QFT are better implemented in ALMP traineeships on the ground than open market traineeships**. There are also still eleven Member States that have low or very low degree of implementation on the ground for open market traineeships. No Member States have a high degree of implementation on the ground of open market traineeships.

Table 11. Degree of the QFT implementation on the ground

Degree of implementation on the ground	Open market traineeships	ALMP traineeships ⁶⁹
High		BE, IE, LT, LU, MT, RO, SE (7 MS)
Moderate	AT, BE, DE, ES, HU, LT, LU, NL, RO (9 MS)	BG, CY, DE, DK, EE, ES, FI, FR, HR, HU, IT, LV, NL, PL, PT, SI, SK (17 MS)
Low	BG, CZ, HR, IE, LV, PL, SI, PT, (8 MS)	CZ, EL (2 MS)
Very low	CY, DK, EL (3 MS)	
Not applicable ⁷⁰	EE, FI, FR, IT, MT, SE, SK (7 MS)	

Source: Ecorys 2022

3.2.3. Grouping of Member States by degree of implementation of the QFT in national legislation and on the ground

Based on the degree of implementation of the QFT in national legislation and the degree of implementation of the QFT on the ground, we can distinguish five groups of EU Member States in terms of their degree of QFT implementation overall. This is presented in the table below:

⁶⁹ The assessment on the degree of implementation on the ground of ALMP traineeships in Austria was not possible. Vacancies are not available publicly for ALMP traineeships and the PES declined to contribute to the study.

⁷⁰ Not applicable refers to countries where the law forbids a particular type of traineeship or where open market traineeships do not exist/ are very rare

Table 12. Grouping of Member States by degree of implementation of the QFT

Group	Country	OMT implementation in national legislation	OMT on the ground implementation	ALMP implementation in national legislation	ALMP on the ground implementation	Similarities
Group 1. High degree of implementation in national legislation and on the ground of both open market and ALMP traineeships	LT					These countries show both high implementation of the QFT principles in national legislation and on the ground for both open market traineeships and ALMP traineeships. The majority of QFT principles are implemented in relevant legal acts and there are no major obstacles to QFT implementation, whilst its impact is perceived as positive.
	LU					
	RO					
	BE					
	NL					
	HU					
	ES					
	DE					
	PT					
	AT ⁷¹					
Group 2. High degree of implementation in national legislation and on the ground of the QFT principles for ALMPs. Open market traineeships not existent or very rare	EE					In these countries, OMTs are either forbidden by law or do not exist. Nonetheless, there is a high degree of implementation of the QFT in legislation on ALMP as well as a high degree of implementation on the ground implementation. Despite some minor obstacles identified in these countries, the overall level of traineeship quality for ALMP is high and these countries have generally a reasonably well-functioning system of ALMP traineeships.
	FI					
	FR					
	IT					
	SE					
	SK					
	MT					
Group 3. Partial degree of legal and on the ground implementation for open market traineeships; high level of implementation for ALMP traineeships	IE					QFT principles are only modestly implemented in legislation and on the ground for open market traineeships in these countries. However, there is a high degree of implementation in national legislation for ALMP traineeships and in practice, with minimal discrepancies between their legal frameworks and practices on the ground.
	LV					
Group 4. High degree of implementation of the QFT in national legislation for both open market traineeships and ALMP traineeships; difficulties with on the ground implementation	BG					Despite high level of implementation of the principles of the QFT in national legislation for both types of traineeships, countries in this group have a low degree of implementation of the QFT on the ground. Enforcement of regulations in place is low, and several criticisms of traineeship quality have not been addressed.
	CZ					
	PL					
	SI					
Group 5. Modest degree of implementation of the QFT in national legislation and on the ground for open market traineeships; higher degree of implementation for ALMP traineeships in national legislation and on the ground.	EL					This group consists of countries which struggle both with legal and on the ground implementation of the QFT for open market traineeships. There is a problem with law enforcement and evidence of poor-quality traineeships offered on the market. However, the situation is better for ALMP traineeships, where legislation partially or mostly implements the QFT principles.
	DK					
	HR					
	CY					

Legend

Implementation in national legislation		Implementation on the ground	
	Fully/mostly implemented: 10 or more principles out of 12 implemented in national legislation		High: Vacancies reviewed in the country show a high degree of alignment with the QFT legislative principles; there is a lack of obstacles to QFT implementation, and there is evidence of positive QFT impact on trainees and society
	Partially implemented: 6 to 9 principles out of 12 implemented in national legislation		Moderate: Vacancies reviewed in the country show a moderate or low degree of alignment with the QFT legislative principles; there are some obstacles to QFT implementation, but there is evidence of positive QFT impact on trainees and society
	Modestly implemented: 3 to 5 principles out of 12 implemented in national legislation		Low: Vacancies reviewed in the country show a moderate or low degree of alignment with the QFT legislative principles; there are some obstacles to QFT practical implementation, and there is weak evidence of positive QFT impact on trainees and society
	Not implemented: 2 or fewer principles out of 12 implemented in national legislation		Very low: Vacancies reviewed in the country show a low degree of alignment with the QFT legislative principles, there is evidence of major obstacles to QFT practical implementation, and there is evidence of low or negative QFT impact on trainees and society.
	Not applicable: If the law forbids a particular type of traineeship or none of the QFT principles are implemented because this type of traineeship does not exist in the country.		Not applicable: If the law forbids a particular type of traineeship or none of the QFT principles are implemented because this type of traineeship does not exist in the country.

Source Ecorys, 2022

⁷¹ A judgement on the degree of practical implementation of the ALMP legislative framework in Austria has not been possible as PES declined to contribute to the study, and traineeship vacancies of the PES are not publicly available.

3.2.4. Implementation of other principles of the QFT

Cross-border traineeships (principle 13)⁷²

One of the objectives of the QFT was to increase the uptake of cross-border traineeships in the EU. The research for this study found a lack of comprehensive data on the number of cross-border traineeships at the national level. There are **some indications that cross-border traineeships have become slightly more common**, but it is also clear that the **barriers to accessing them that were present before the QFT was adopted are still in place**.

In the Eurobarometer survey on traineeships of 2013, 11% of respondents had undertaken one or more traineeships abroad. Whilst the two surveys are in no way directly comparable, the trainee survey conducted for this study shows that 19% of respondents had undertaken a cross-border traineeship (363 out of 1.912). The 2022 Flash Eurobarometer on Youth and Democracy finds a similar share, with 15% of young people surveyed having undertaken a study, training or apprenticeship opportunity abroad.⁷³ This may suggest that cross-border traineeships have increased since 2014, as per the objective of the QFT. However, the study also identified a serious lack of reliable data on the take up of cross-border traineeships meaning that such an assessment needs further investigation.

In either case, it is clear that the **key barriers preventing young people from taking up traineeship opportunities in another Member State remain** and reflect concerns that were present at the time of adoption of the QFT. These centre around an overall issue of **lack of resources and information**. The 2011 Eurobarometer on Youth on the Move found that, of those respondents who had not undertaken a mobility opportunity in another Member State, 33% stated that lack of financial means was the most or second most important reason for not having spent time abroad, whilst 19% had not done so as they did not have enough information⁷⁴. Whilst these figures relate to mobility in general and are not specific to cross-border traineeships, they do indicate that **financial barriers are likely to have played an important role** in deterring the uptake of cross-border traineeships before the adoption of the QFT. The survey of trainees conducted for this study suggests that this is still the case:

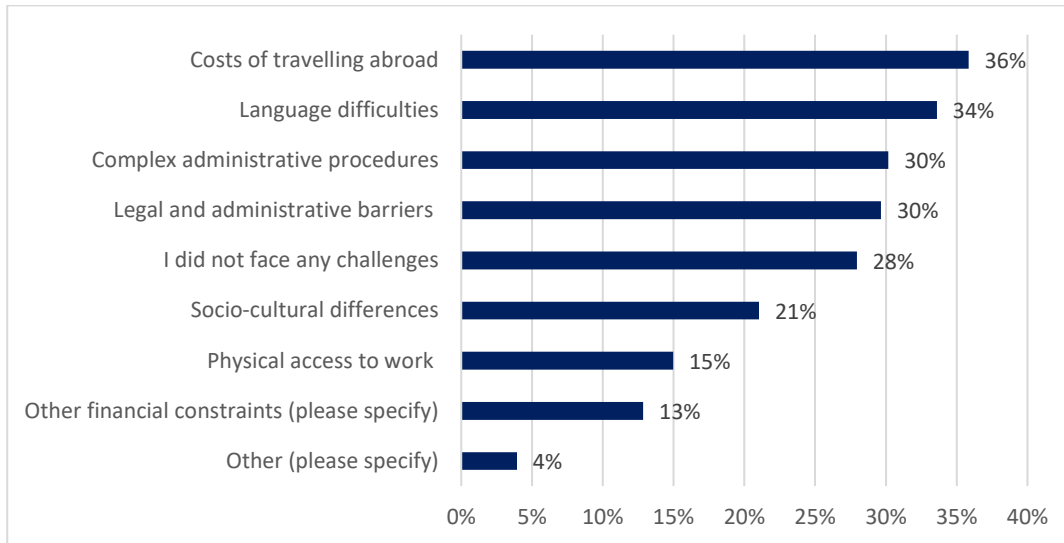
- 37% of trainees surveyed indicated that lack of financial resources limits their possibilities to undertake a traineeship abroad.
- An equal share of trainees (37%) also mentioned lack of interest as their main reason for looking for a cross-border, which might indicate a broader need to further disseminate information on traineeships and their positive effects on young people's career pathways.
- 27% of trainees surveyed mentioned not being well-informed about cross border traineeships.

Furthermore, the trainee survey shows that, even when young people do take up cross-border traineeships, they have to overcome several challenges (Figure 5) The costs of travelling abroad is the most frequently reported challenge (36%), followed by language barriers (34%). Moreover, additional challenges include complex administrative procedures (30%), as well as legal and administrative barriers such as different taxation systems, social security and pension entitlements (30%), and socio-cultural differences (21%). These challenges indicate that more can be done for the QFT to further harmonise approaches to traineeships across the EU.

⁷² Numbering as per the numbering used for the study, please see Figure 2

⁷³ <https://europa.eu/eurobarometer/surveys/detail/2282>

⁷⁴ Ibid.

Figure 5. What were the challenges that you faced in your cross-border traineeship experience?

Source: QFT online survey 2022, N=543

The QFT includes references to the role of the **European Job Mobility Portal (EURES)**⁷⁵ in disseminating information on cross-border traineeships, providing support to applicants, and facilitating trainee mobility. EURES provides detailed information on living and working conditions in all Member States, as well as on where to find and advertise opportunities. The updated EURES regulation, moreover, includes an obligation for Member States to provide EU-wide data on paid apprenticeships and traineeships abroad⁷⁶.

However, the trainee survey indicated that only 13% of respondents made use of the EURES portal to find a cross-border traineeship, with Romania (33%), Greece (33%), Austria (25%), Cyprus (25%), Poland (22%) and Bulgaria (20%) standing out as the countries where the highest share of respondents indicated having used EURES to find a traineeship opportunity. The low usage of EURES is in line with the findings of the study supporting the European Commission's ex-post evaluation of EURES, which highlighted difficulties in providing specific support services targeting youth and linked to apprenticeships and traineeships, mostly due to persisting differences and lack of harmonisation in national legislative frameworks for traineeships outside of education (e.g., legal uncertainties around the definition of trainees).⁷⁷

Use of EU structural funds (principle 14)⁷⁸

The QFT encourages Member States to make use of European Structural Investment Funds (ESIF) – namely the European Social Fund (ESF),⁷⁹ the European Regional Development Fund (ERDF),⁸⁰ and the Youth Employment Initiative (YEI),⁸¹ to increase the number and quality of traineeships.

⁷⁵ https://ec.europa.eu/eures/public/index_en

⁷⁶ Regulation 2016/589 of the European Parliament and of the Council of 13 April 2016 on a European network of employment services (EURES), workers' access to mobility services and the further integration of labour markets, and amending Regulations (EU) No 492/2011 and (EU) No 1296/2013, OJ L 107, 22.4.2016

⁷⁷ Deloitte, VVA and FGB (2021), Study supporting the ex-post EURES evaluation and the second biennial EURES report, European Commission, DG EMPL, p. 249. <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8370&furtherPubs=yes>

⁷⁸ Numbering as per the numbering used for the study, please see Figure 2

⁷⁹ <https://ec.europa.eu/esf/home.jsp>

⁸⁰ https://ec.europa.eu/regional_policy/en/funding/erdf/

⁸¹ <https://ec.europa.eu/social/main.jsp?catId=1176>

Support for youth employment in the 2014-2020 Multiannual Financial Framework

For the programming period 2014-2020, the ESF regulation identified the “sustainable integration into the labour market of young people”, in particular NEETs and young people at risk of social exclusion, as one of ESF’s investment priorities under the broader thematic objective of “promoting sustainable and quality employment and supporting labour mobility”.⁸² The YEI also aimed to support Member States worst hit by youth unemployment following the 2008-2013 financial and economic crisis, particularly through the implementation of the Youth Guarantee.

The YEI had a total budget of EUR 8.9 billion,⁸³ further complemented by Member States own resources. In addition, another EUR 8.2 billion of ESF funding was allocated to supporting youth in the labour market, bringing the total investment in youth employment between 2014-2020 to EUR 18.6 billion.⁸⁴

Source: Regulation No 1304/2013 on the European Social Fund and repealing Council Regulation (EC) No 1081/2006 and Commission Staff Working Document on Evaluation of the ESF and YEI Support to Youth Employment [SWD (2020) 217]

While there is no information on the exact share of EU funding that has been invested in increasing the number and quality of traineeships, research shows that **EU funds have been used mainly to provide support to employers through the deployment of subsidies and contribute to covering the costs of ALMP traineeship programmes** at the national, regional and local levels⁸⁵. The significant volume of YEI and ESF-funded operations is highlighted in the European Commission’s 2020 evaluation of the ESF and YEI Support to Youth Employment, which found that the ESF/YEI had fully funded labour market measures specifically designed to help disadvantaged young people (i.e. unemployed, employed but at risk and inactive young people) in several Member States, and that all traineeships in Bulgaria, Greece, Latvia, Malta, Portugal and Slovenia had been co-funded by ESF and the YEI.⁸⁶

These findings are also reflected in the evidence gathered through the case studies, which provide examples of how ESF funding has been invested to support youth employment through traineeships:

- In **Greece**, costs associated with traineeship opportunities are covered through the national budget, employer contributions, and the ESF. These costs mostly cover trainee compensation, which currently equals 80% of the national minimum wage; and costs associated with health and safety insurance. EU funds have not been used to finance employer subsidies in Greece.
- In **Ireland**, the traineeship programme led by the Education and Training Boards (ETB)⁸⁷ is co-funded by the national budget and the ESF, as part of the ESF Programme for Employability, Inclusion and Learning 2014-2020.⁸⁸ As with Greece, Ireland does not currently offer any financial incentives to encourage employer engagement in traineeships, in contrast to the Apprenticeship Incentivisation Scheme which offers employers an incentive payment of EUR 3.000 to take on new apprentices.
- In **Lithuania**, traineeship grants are funded by ESF and/or the national budget. The Lithuanian Public Employment Services estimate that in 2021 approximately 200 unemployed people undertook an ALMP traineeship, and that EUR 150.000 in traineeship grants were

⁸² ESF investment priority 8(ii), see <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R1304&from=en>

⁸³ European Commission, 2016, SWD(2020) 216 final, Evaluation of the ESF and YEI Support to Youth Employment <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0216&from=NL>

⁸⁴ Ibid.

⁸⁵ Ibid.

⁸⁶ Ibid.

⁸⁷ <https://eufunds.ie/european-social-fund/what-do-we-fund/etb-training-for-the-unemployed/>

⁸⁸ <https://eufunds.ie/european-social-fund/operational-programmes/programme-for-employability-inclusion-and-learning-2014-2020/>

made available, EUR 134.000 of which were provided through ESF⁸⁹. A recent example of an ESF/YEI co-funded traineeship programme in Lithuania is the "Promotion of Youth Employment (2019-2022)"⁹⁰. This project targets NEETs aged 16-29 and registered with the PES, and aims to provide support to young people, including through traineeship opportunities.

- In **Italy**, the implementation of the Youth Guarantee has incentivised greater investments in school-to-work transitions, and in traineeships in particular. National budgets as well as ESF funding have been used to provide traineeship providers with incentives to hire trainees and/or cover all or part of the costs associated with traineeships. Examples of regional level traineeship programmes supported by ESF funding include the 'Re-Work' programme⁹¹ in Umbria, the 'Giovani si' programme⁹² in Tuscany, and the 'Piano PIPOL' programme⁹³ in Friuli Venezia Giulia. ESF funding has also supported job-matching, by helping employers to identify potential trainees: for example, Emilia Romagna's Labour Agency deploys ESF funding to cover the fees to be paid to "traineeship promoters", who are tasked with profiling potential trainees on the basis of their employability.

Involvement of relevant actors (principles 15-16)⁹⁴

The QFT promotes the active involvement of key stakeholders (including social partners, public employment services, education institutions and training providers) in applying its principles. The study has found that different actors are involved in application of the QFT. The majority of respondents to the public consultation felt that the active involvement of social partners and other key stakeholders in implementing quality traineeships was very important or important. Cooperation is particularly relevant for **social partners**, with employer organisations and trade unions valuing stakeholders' engagement the most (67% and 100%, respectively).

Examples of the way that social partners are involved in applying the QFT include:

Involvement in ministerial working groups

- In **Finland**, employer organisations participate in ministerial working groups where issues related to school to work transitions and traineeships are discussed and priorities agreed.
- In **Croatia**, trade unions are part of an institutional working group/advisory body monitoring the implementation of the Youth Guarantee which also covers implementation of the QFT.

Involvement in negotiations on new legislation governing traineeships

- In **Italy**, the largest employer organisation, Confindustria, has been involved both in the negotiations that led to the adoption of the first "Guidelines on traineeships" in 2013,⁹⁵ hereinafter "GL2013"), and in the process that resulted in their reform in 2017.⁹⁶

⁸⁹ <https://uzt.lt/darbo-rinka2/adrpp/>

⁹⁰ <https://uzt.lt/es-investicijos/gyvendinami-projektai/jaunimo-uzimtumo-skatinimas/>

⁹¹ <https://www.arpalumbria.it/avvisipubbliciperlepersonep/avviso-pubblico-re-work#>

⁹² <https://giovani.it/>

⁹³ <https://www.regione.fvg.it/rafvfg/cms/RAFVG/formazione-lavoro/tirocini-apprendistato/FOGLIA7/>

⁹⁴ Numbering as per the numbering used for the study, please see Figure 2

⁹⁵ Agreement of 24/1/2013 concluded at the State - Regions Permanent Conference for the approval of the first "Guidelines on traineeships".

⁹⁶ Agreement of 25 May 2017 concluded at the State - Regions Permanent Conference on the "Guidelines on traineeships with formative and guidance purposes".

- In **Luxembourg**, the Chambers of Employees were involved in the negotiations leading to the adoption of the amendment to the Labour Code implementing the QFT principles⁹⁷.
- In **Ireland**, the Further Education and Training Authority, SOLAS, drafted the “Further Education and Training Strategy 2014-2019”,⁹⁸ in cooperation with a range of key actors including education and traineeship providers, employers and the Department of Social Protection. The Strategy recognises the need to forge strong partnerships between employers, employees, trade unions and traineeship providers for the implementation of quality traineeships that match labour market needs⁹⁹.
- At the **EU level**, social partners actively contribute to the debate around quality traineeships. For example, the European Trade Union Confederation (ETUC) led several campaigns to support young people entering the labour market: these include the 2017 Pay Rise Campaign, which also included a call for fair remuneration for interns,¹⁰⁰ and a 2022 to ban unpaid traineeships¹⁰¹. Furthermore, employer organisations, such as Business Europe have also published positions on traineeships, with a reference to the QFT¹⁰².

Involvement in monitoring

- In **Finland**, trade unions work closely with the Ministry of Education and Culture in monitoring quality and developing recommendations. Moreover, they are involved in monitoring the implementation of EU level initiatives such as the Youth Guarantee, which covers traineeships.
- In **Denmark**, social partners support monitoring efforts, particularly in relation to trainees’ progress while undertaking ALMP traineeships.

In a limited number of Member States, social partners are also involved in QFT application through defining working conditions for trainees in the context of **collective bargaining agreements**. In **Austria**, the Chamber of Labour, is involved in negotiations around collective bargaining agreements for traineeships and has been using this as an avenue to advocate for trainees to be paid the minimum entry level salary in the sector where their traineeship takes place. For example, the collective bargaining agreement for the IT sector includes a separate section on minimum pay for different types of traineeships: mandatory traineeships, voluntary student traineeships (i.e., traineeships that are not part of the school curriculum) and student summer jobs. Furthermore, the Ministry of Labour, the Chambers of Labour, the Economic Chambers and the Austrian Health Insurance Fund regularly cooperate to publish traineeship guidelines informing trainees, their families and/or companies about their rights and obligations.¹⁰³

According to a recent study¹⁰⁴ and stakeholder interviews, social partners are involved in defining remuneration levels for trainees for open market traineeships through collective bargaining agreements in **Finland** and **Spain**. In **Finland**, trade unions at sectoral level are involved in collective bargaining agreements: while their scope tends to be wide and diverse, traineeships and apprenticeships are mentioned and regulated in these (e.g., with a reference to pay, quality issues, rights and working conditions etc.). In **Spain**, trade unions regularly engage in negotiations with

⁹⁷ The amendment regulating traineeship agreements entered into force on 9 July 2019.

⁹⁸ <https://www.solas.ie/fi/70398/x/920e2fa0b6/fetstrategy2014-2019.pdf>

⁹⁹ Ibid.

¹⁰⁰ https://etuc.org/sites/default/files/other/files/youth_briefing_2.pdf

¹⁰¹ <https://etuc.org/en/circular/campaign-ban-unpaid-internships-finally>

¹⁰² <https://www.buinessseurope.eu/publications/quality-framework-traineeships-buinessseurope-position-paper>

¹⁰³ Examples include the following: [brochure](#) by the Federal Ministry of Labour, Social Affairs and Consumer Protection; [brochure](#) by the Austrian Health Insurance Fund; [brochure](#) by the Economic Chambers; [brochure](#) by the Vienna Chamber of Labour.

¹⁰⁴ European Network of Public Employment Services (2021), Remuneration of Open-Market Traineeships in EU-27. <https://ec.europa.eu/social/BlobServlet?docId=24300&langId=en>

employer organisations and/or the government in relation to initiatives that are linked to traineeships and/or QFT principles, such as the recently adopted labour market reform (RDL 32/2021) and the upcoming Trainee Statute (*Estatuto del Becario*). However, the evidence from the case studies and stakeholder consultations (interviews, expert group, validation workshop) shows that **obstacles to the involvement of social partners** still exist.

- **Employer organisations** cited administrative costs related to working and coordinating with PES to implement ALMP traineeships (see section on efficiency); lack of knowledge of administrative rules and/or existing legislation or policies on both ALMP and open market traineeships; lack of organisational knowledge on how to deliver quality traineeship programmes (e.g., in relation to providing adequate mentoring, and ensuring learning outcomes), particularly on the side of micro, small and medium companies; as well as lack of data and/or evidence on the benefits of quality traineeships for employers, which may act as a disincentive.
- While the evidence points towards an overall greater involvement of **trade unions**, interviews with trade unions representatives have shown that the level of engagement can be low in countries where traineeships are not considered a priority. For example, in **Germany**, **France**, and **Latvia**, traineeships, and open market traineeships in particular, are not seen as a priority issue. This is due to either the fact that legislation is already in place to regulate traineeships and prevent their misuse (e.g., FR), or due to capacity constraints that lead to resources not being allocated to the issue. In other instances, trade unions' involvement in discussions around quality traineeships is indirect. For example, in **Spain**, **Finland**, and **Sweden**, collective bargaining agreements do not focus exclusively on traineeships, but rather cover entire sectors, with school-to-work transitions being regulated as part of these broader negotiations.

In all Member States, **Public Employment Services** are actively involved in the design, delivery and promotion of ALMP traineeship programmes, at times in cooperation with other national authorities and employers/employer organisations. Examples from the case studies and interviews include:

- In **Slovakia**, PES are involved in the design, implementation (e.g., through ESF/YEI funded projects), promotion (e.g., through information campaigns) and monitoring (e.g., through annual reports, regular monitoring through EMCO) of traineeships.
- In **Belgium**, PES at the regional level (VDAB, Actiris and Forem) have cooperated closely to implement a variety of traineeship programmes, which they also monitor.
- In **Italy**, Fondazione Lavoro has been promoting traineeships opportunities since 2014, with a record high of 30.000 in 2019, before the COVID-19 pandemic. In 2021, 26.000 traineeships have been activated.
- In **Ireland**, SOLAS offers ALMP traineeships under the umbrella of the Youth Guarantee.¹⁰⁵ These programmes are subject to regular reviews to ensure continual improvement in their relevance to the needs of trainees and of local labour markets.¹⁰⁶

PES are also involved in applying the QFT indirectly through developing **guidance and support** for key actors (traineeship providers) on how to implement high quality traineeships

- In **Ireland**, PES officers are tasked with ensuring that training offers are appropriate to the needs of individual trainees.¹⁰⁷ Moreover, SOLAS plays a role in linking employers with

¹⁰⁵ <https://www.solas.ie/>

¹⁰⁶ Sienkiewicz, L. (2017), Traineeships under the Youth Guarantee: experience from the ground. <https://ec.europa.eu/social/BlobServlet?docId=20514&langId=en>

¹⁰⁷ Ibid.

Educational and Training Boards (ETBs)¹⁰⁸ that deliver ALMP traineeships,¹⁰⁹ and was involved in the development of guidelines for employers – “The Five-Step Guide to Traineeship in Ireland”,¹¹⁰ reflecting the QFT principles.

- In **Sweden**, PES provide support to traineeship providers through guidelines and are responsible for monitoring practices on the ground.

In some cases, this work is also undertaken by **other national education or employment bodies** such as in **Bulgaria** the Centre for Career Development and in **Poland**, the Association of Human Resources Management. Examples are included in the Box below.

Actors involved in developing guidelines for quality traineeships

In **Bulgaria**, the Inter-University Centre for Career Development (ICCD)¹¹¹ facilitates matching of potential trainees with employers. The summer traineeship programmes developed by Electrohold Bulgaria¹¹² (ELBG), ‘Energy for the future’, moreover, represents another example of cooperation between businesses, PES, and education institutions. The programme targets university students recruited through “career days” and is based on a traineeship contract registered with the National Revenue Agency, which includes the provision of remuneration and other benefits (e.g., meal vouchers).

In **Poland**, the Polish Association of Human Resources Management developed the Framework for High-Quality Traineeships and Internships,¹¹³ providing guidance to implement high-quality traineeships. The framework is supported an implementation guide has been endorsed by the Ministry of Science and Higher Education, the Polish Agency for Enterprise Development, and the Ministry of Labour and Social Policy.¹¹⁴ Involvement in preparing the European Action Plan for Youth Employment. In Poland, the Action Plan for Youth Employment. The project was widely discussed and promoted with broad participation of social partners, trade unions and employers in Poland. Traineeships for young people and their quality were essential in this Action Plan.

Actions by the European Commission (principles 17-22)¹¹⁵

The QFT foresees a key role for the European Commission in ensuring close cooperation with the Member States, social partners and other stakeholders to encourage, monitor progress with, and report on the implementation of the Recommendation. Moreover, the European Commission is expected to support Member States in making use of EU funding programmes to increase the number and quality of traineeships; and examine the possibility to include paid traineeships in EURES, including through the set-up of a dedicated webpage on national legal frameworks for traineeships.

Since the adoption of the QFT in 2014, the **European Commission has implemented a broad range of actions to encourage Member States to apply the QFT principles** and further improve the quality of traineeships across the EU, as outlined in Table 13 below.

¹⁰⁸ <https://www.etbi.ie/about-etbi/>

¹⁰⁹ Sienkiewicz, L. (2017), Traineeships under the Youth Guarantee: experience from the ground. <https://ec.europa.eu/social/BlobServlet?docId=20514&langId=en>

¹¹⁰ <https://www.solas.ie/f/70398/x/6be598ec22/traineeship-guide.pdf>

¹¹¹ <https://iccd.unwe.bg/>

¹¹² <https://electrohold.bg/bg/>

¹¹³ <http://stazeipraktiki.pl/images/pdf/informator-prjsip.pdf>

¹¹⁴ Sienkiewicz, L. (2017), Traineeships under the Youth Guarantee: experience from the ground. <https://ec.europa.eu/social/BlobServlet?docId=20514&langId=en>

¹¹⁵ Numbering as per the numbering used for the study, please see Figure 2

Table 13. Actions undertaken by the European Commission to support implementation of the QFT

Type of support provided by the European Commission	Specific actions implemented
<i>Monitoring the impact of the QFT</i>	<ul style="list-style-type: none"> The 2016 Communication on 'The Youth Guarantee and Youth Employment Initiative three years on'¹¹⁶, provided information on QFT implementation with a link to traineeship offers under the Youth Guarantee.¹¹⁷ The Staff-Working Document on 'Applying the Quality Framework for Traineeships'¹¹⁸ was included as an annex to this communication and took stock of measures undertaken by Member States to transpose the QFT principles, as well as remaining challenges. The 2017 Indicator Framework for Monitoring the Youth Guarantee, while not mentioning the QFT, includes indicators to monitor traineeship quality.¹¹⁹ The 2018 report on 'Traineeships under the Youth Guarantee – experiences from the ground',¹²⁰ and the 2021 report on 'Remuneration of Open-Market Traineeships in EU-27'.¹²¹ The 2019 Employment Committee (EMCO)¹²² review on the Youth Guarantee implementation, included a focus on traineeships as one of the types of offers under the scheme. The conclusions from the thematic review highlighted while ALMP traineeships largely comply with the QFT, there was a lack of legislative frameworks regulating open market traineeships in several Member States¹²³.
<i>Promoting quality traineeships through new policy initiatives:</i>	<ul style="list-style-type: none"> The 2020 Council Recommendation A Bridge to Jobs – Reinforcing the Youth Guarantee¹²⁴ which calls for traineeships offers under the scheme to adhere to the minimum quality standards laid out in the QFT.
<i>Supporting quality traineeships through EU funding instruments</i>	<ul style="list-style-type: none"> The 2021-2027 Multiannual Financial Framework includes a number of funding programmes that support youth employment, including through traineeships – namely the European Social Fund Plus and Erasmus+. Recovery instruments such as the Recovery and Resilience Facility (RRF)¹²⁵ and REACT-EU¹²⁶ also have the potential to support youth to access a post-pandemic labour market.

¹¹⁶ European Commission, 2016, COM(2016) 646 final Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions The Youth Guarantee and Youth Employment Initiative Three Years On, <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016DC0646&from=EN>

¹¹⁷ Council of the European Union, EMCO Review of the implementation of the Youth Guarantee, 5 December 2019, https://www.parlament.gv.at/PAKT/EU/XXVII/EU/00/58/EU_05845/imfname_10946009.pdf

¹¹⁸ European Commission, SWD (2016) 324 final, Applying the Quality Framework for Traineeships <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016SC0324&from=EN>

¹¹⁹ <https://ec.europa.eu/social/main.jsp?catId=115>

¹²⁰ Sienkiewicz, L. (2017), Traineeships under the Youth Guarantee: experience from the ground. <https://ec.europa.eu/social/BlobServlet?docId=20514&langId=en>

¹²¹ <https://ec.europa.eu/social/main.jsp?catId=1045&langId=en#country sheets>

¹²² <https://ec.europa.eu/social/main.jsp?catId=115>

¹²³ EMCO thematic review conclusions 2019-2020 – Final version <https://ec.europa.eu/social/BlobServlet?docId=24143&langId=en>

¹²⁴ Council Recommendation of 30 October 2020 on A Bridge to Jobs – Reinforcing the Youth Guarantee and replacing the Council Recommendation of 22 April 2013 on establishing a Youth Guarantee [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020H1104\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020H1104(01)&from=EN)

¹²⁵ https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility_en

¹²⁶ https://ec.europa.eu/regional_policy/en/newsroom/coronavirus-response/react-eu/

Promoting cross-border traineeships	<ul style="list-style-type: none"> The 2016 EURES regulation¹²⁷ introduced an obligation for Member States to share EU-wide data on (paid) traineeships subject to an employment relationship as from 2018.
Promoting mutual learning and fostering cooperation	<ul style="list-style-type: none"> The launch of the European Pact for Youth¹²⁸ in 2015. This joint initiative by the European Commission and CSR Europe aimed to create quality business-education partnerships and provide good quality apprenticeships, traineeships, or entry-level jobs. While information on the final results of the initiative is not publicly available, in 2017 23.809 partnerships had been created under the umbrella of the Pact for Youth, leading to 161.547 new opportunities for youth, including 42.851 traineeships.¹²⁹ The 2017 conference on 'Quality Traineeships in the EU - Youth Guarantee, European Solidarity Corps and beyond' organised by the European Commission in cooperation with the European Youth Forum, to discuss traineeship quality and traineeship opportunities within existing EU initiatives. The 2019 seminar on 'Creating conditions for quality traineeships' organised by the European Commission to bring together stakeholders from the EU and national level.¹³⁰ Ongoing regular meetings National Youth Guarantee coordinators (2015-2022), where the QFT has been a recurrent agenda item.

Source: Ecorys 2022

Evidence gathered through the stakeholder consultations (interviews, expert meeting) suggests that the European Commission's efforts to promote mutual learning, exchange of good practices, and promote cooperation across stakeholder groups and Member States are perceived as useful. Consultees, particularly among employer organisations and national authorities, stressed the need to ensure that further opportunities for peer learning are provided at EU level, to strengthen the QFT and support its implementation (see section 4.2 on EU added value). However, in relation to monitoring efforts, the study identified both the lack of up-to-date data, at EU and national level, on traineeships as well as the lack of a systematic approach to monitoring the implementation of the QFT and quality traineeships as areas requiring further action from the European Commission.

¹²⁷Regulation (EU) 2016/589 of the European Parliament and of the Council of 13 April 2016 on a European network of employment services (EURES), workers' access to mobility services and the further integration of labour markets, and amending Regulations (EU) No 492/2011 and (EU) No 1296/2013 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0589&from=EN>

¹²⁸ <https://ec.europa.eu/social/main.jsp?langId=en&catId=89&newsId=2387&furtherNews=yes>

¹²⁹European Pact for Youth, PowerPoint presentation, 2016,

<https://static1.squarespace.com/static/5df776f6866c14507f2df68a/t/5fbcf95c00f7af3919d34fbc/1606220130120/The+European+Pact+for+Youth+Achievements.pdf>

¹³⁰ <https://ec.europa.eu/social/main.jsp?catId=1045&langId=en>

4. Evaluation findings

4.1. To what extent was the intervention successful and why?

Effectiveness

Key findings on effectiveness

The principles of the QFT have been enshrined **to a moderate degree in national legislation/frameworks for traineeships**, with key differences across Member States and between types of traineeships. 14 Member States have reformed or introduced legislation/policy to implement the QFT in their legislation/ policy frameworks since its adoption.

Efforts to implement the QFT are however, much more evident in national legislation governing ALMP traineeships however, with 18 Member States currently fully/mostly implementing the QFT principles in national legislation/policy for ALMP traineeships, compared to seven Member States for open market traineeships. **The objective of the Recommendation to ensure more coherent regulatory approaches across Member States has thus been achieved to a limited degree**, particularly for open market traineeships, as regulatory approaches have not significantly converged since the QFT was adopted. Member States that regulate traineeships via specific legislation are more likely to implement the QFT fully or partially than those the regulate traineeships through general labour law.

Monitoring and enforcement mechanisms do exist for both types of traineeships in all Member States; however, they remain more common for ALMP traineeships than for open market traineeships. Furthermore, **even where such mechanisms do exist ‘on paper’, evidence indicates that they have limited impact on ensuring application of the legal framework ‘on the ground’**. This is mainly due to a lack of capacity of labour inspectorates and/or PES to carry out controls and checks on traineeship quality coupled with the absence of clear, specific legislation on traineeships.

It is not possible to ascertain the impact of the implementation of the QFT itself on trainees due the multiple factors which influence trainees’ experiences and outcomes. However, evidence shows that **there have been improvements in the quality of traineeships since 2014 and that quality traineeships as a whole do have a positive impact on young people** in terms of facilitating a stable labour market integration and contributing to youth employment. Positive outcomes of quality traineeships identified in the research include increased employability, access to professional networks and general development, increased access to the labour market and higher starting salaries. The principles of the QFT that have the most positive impact on young people’s labour market integration are those outlining the need to determine learning and educational objectives of the traineeship and the written agreement.

In terms of how the effects of the QFT, through better quality traineeships, are distributed within different subgroups and sectors in Member States, the study has found that there are **inequalities in terms of access to opportunities to undertake traineeships**. Young people from rural areas, from a migrant or lower socio-economic background or with lower educational attainment face barriers in accessing traineeship opportunities, linked largely to the lack of remuneration of traineeships, and the fact that opportunities often take place in urban centres. Despite the lack of monitoring/data on traineeship prevalence, some **recurring sectors emerged from the data as being more prone to low quality traineeships**, including arts, entertainment and recreation and health and social work and education. Furthermore, sectors with a larger share of small enterprises were more likely to not apply the QFT in their traineeships as they face challenges linked to limited human and financial capacity to handle the administrative burden – or the perceived administrative burden – of ensuring quality traineeships.

While there are several similarities, there are also **key differences between the European**

Framework for Quality and Effective Apprenticeships (EFQEA) and the QFT including the more direct recommendations in the EFQEA, and additional elements covered. Even taking into account the different nature of apprenticeships and traineeships, the research indicates that the EFQEA has had a greater degree of effectiveness than the QFT. Key factors contributing to this are: the more collaborative institutional and stakeholder context of the EFQEA; the clearer scope of both the EFQEA and of apprenticeships in general; the higher degree of regulation of apprenticeships meaning that implementation has more support from labour law and collective agreements; the support for the implementation of the EFQEA from the European Alliance for Apprenticeships (EAfA) and the Apprenticeship Support Services; and the more direct, concrete and specific recommendations of the EFQEA compared to those of the QFT.

National legislation and enforcement and monitoring of the QFT

To what extent have the principles of the QFT been enshrined in national legislation and/or national quality frameworks since 2014? To what extent did they already exist? What is the scope of current national legislative frameworks and national quality frameworks?

The principles of the QFT have been enshrined **to a moderate degree in national legislation/frameworks for traineeships**, with key differences across Member States and between types of traineeships.¹³¹ 14 Member States have reformed or introduced legislation and/or policy to implement the QFT in their legislation/frameworks for traineeships since its adoption. However, change since 2014 is more evident in national legislation/policy governing ALMP traineeships, with 12 Member States adapting or introducing legislation and policy for ALMP traineeships in line with the QFT since 2014 (BE, BG, DK, EE, EL, HR, IE, IT, LT, PT, RO, SK) compared to five Member States (BG, ES, LT, LU, RO) for open market traineeships, as outlined in the table below.

In terms of the current degree of implementation of the QFT, the study found that 18 Member States are fully/mostly implementing the QFT principles in national legislation/policy for ALMP traineeships, compared to seven Member States for open market traineeships, as outlined the table below.

Table 14. Current degree of implementation of the QFT in national legislation/policy (Q4 2021) and change since 2014 (marked by X)

Country	Implementation in national legislation/policy on open market traineeships	Implementation in national legislation/policy on ALMP traineeships
AT		
BE		X
BG	X	X

¹³¹ Methodological note: The principles considered in the evaluation of this question are specifically the 12 principles on the standards and conditions of traineeships that can be implemented by Member States through national legislation/quality frameworks on traineeships. These are outlined in Figure 2 and include the following: Traineeships are based on a written agreement; Written agreements indicate educational objectives, working conditions, whether an allowance or compensation is provided and how much, rights/obligations of all parties, duration; Tasks allow the trainee to work towards their learning and training objectives; Traineeship providers assign a supervisor for the trainee; Trainees' rights and working conditions under applicable law are respected including limits to max weekly working time, weekly rest periods, minimum holiday entitlements; Traineeship providers clarify if they provide trainees with health and accident insurance and sick leave; The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount; Traineeship providers include in their vacancies information on the conditions of the traineeship; The duration of the traineeship does not exceed six months, except when justified; The conditions for an extension or renewal of the traineeship are clarified; The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship; The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate.

CY		
CZ		
DE		
DK		X
EE		X
EL		X
ES	X	
FI		
FR		
HR		X
HU		
IE		X
IT		X
LT	X	X
LU	X	
LV		
MT		
NL		
PL		
PT		X
RO	X	X
SE		
SI		
SK		X

Legend

Implementation in national legislation	
X	Change implemented in national legislation/policy since 2014
	Fully/mostly implemented: 10 or more principles out of 12 implemented in national legislation
	Partially implemented: 6 to 9 principles out of 12 implemented in national legislation
	Modestly implemented: 3 to 5 principles out of 12 implemented in national legislation
	Not implemented: 2 or fewer principles out of 12 implemented in national legislation
	Not applicable: If the law forbids a particular type of traineeship or this type of traineeship does not exist/is very rare in the country.

Source: Ecorys, 2022

Comparing the degree of implementation to the types of regulatory approaches used in Member States (see section 3.2.1) shows that **Member States that regulate traineeships via specific legislation as opposed to general labour law are more likely to implement the QFT fully or partially**. ALMP traineeships are more likely to be regulated via specific legislation (as is the case in 21 Member States), whilst regulatory approaches to open market traineeships are more varied, with 10 Member States regulating via specific legislation and nine via general labour law. It is notable that out of the Member States that regulate open market traineeships via general labour law, none fully implement the QFT as indicated in Table 15.

Table 15. Regulatory approaches to open market traineeships and degree of implementation of the QFT in national legislation

Open market traineeships				
	Fully implemented	Partially implemented	Modestly implemented	Not implemented
Specific legislation	BG, ES, LT, LU, RO, SI (6 MS)	BE, DE, PL, PT (4 MS)	-	-
General labour law	-	AT, CZ, HU, NL (4 MS)	EL, HR, IE, LV (4 MS)	DK (1 MS)
No legislation	-	-	CY (1 MS)	-
Type of traineeship does not exist				EE, FR, FI, IT, MT, SE SK (7 MS)
ALMP traineeships				
	Fully implemented	Partially implemented	Modestly implemented	Not implemented
Specific legislation	AT, BE, BG, ES, FI, FR, HR, LT, LU, IT, MT, PL, PT, RO, SI, SE, SK (17 MS)	DE, DK, EL, EE (4 MS)	-	-
General labour law	-	CZ, HU, LV, NL (4 MS)	-	-
No legislation	IE (1 MS)	CY (1 MS)		-

Source: Ecorys, 2022

To what extent do enforcement and/or regular follow-up monitoring exist and to what extent do they confirm an adherence to national legislation and/or national quality frameworks and/or the overarching QFT? Is there evidence of adverse effects too?

The study has found that even though **monitoring and enforcement mechanisms exist for the majority of Member States** for both open market traineeships (present in 14 Member States) and ALMP traineeships (present in all 27 Member States), **they are not adequately used**, thus lowering the degree to which legislation in place is implemented in practice. There is also more evidence of weak enforcement and monitoring mechanisms for open market traineeships, than for ALMP traineeships – this is the case even in countries where the legislative framework fully implements the QFT (e.g., BE, BG, ES).

Table 16. Existence of monitoring and/or enforcement mechanisms

Type of traineeship	Evidence of effective monitoring and/or enforcement mechanisms	Evidence of weak monitoring and/or enforcement mechanisms exists	No evidence of any monitoring and/or enforcement mechanisms	Not applicable (this type of traineeship does not exist in the country)
ALMP	AT, BE, BG, DE, DK, EE, EL, FR, FI, HR, HU, IE, LT, LU, LV,	CY, CZ, ES, IT (4 MS)	-	

	MT, NL, PL, PT, RO, SI, SE, SK (23 MS)			
Open market	DE, EL, LU, RO, SI (5 MS)	AT, BE, BG, CY, DK, ES, HU, IE, PT (9 MS)	CZ, HR, LT ¹³² , LV, NL, PL (6 MS)	EE, FI, FR, IT, MT, SE, SK (7 MS)

Source: Ecorys, 2022

The evidence points to several reasons for this, which affect both types of traineeships.

Inadequate capacity of labour inspectorates: Where monitoring and enforcement mechanisms do exist, issues with capacity to carry out inspections and monitor the situation actively can impede their effectiveness. For example:

- In **Luxembourg**, companies are only allowed to have a maximum of 10% of staff who are trainees. However, the chamber of employees reported that labour inspectorates – who are responsible for controlling this – do not, in practice, have the resources to carry out spot checks.
- Whilst the enforcement mechanisms for ALMP traineeships in **Italy** have been strengthened and include sanctions for providers that do not comply with legislation, all stakeholders consulted (including trade unions and employer organisations) stressed that inspections and controls are poorly implemented: public employment services often lack sufficient staff to actually undertake them.
- In **Ireland**, where ALMP traineeships are heavily and effectively monitored on paper, resource constraints as well as an unwillingness to risk relationships with important employers and jeopardise the traineeship programme more generally can limit enforcement, as highlighted by national authorities interviewed (see Irish case study, Annex 4).

Unclear regulation on open market traineeships: Regulation on open market traineeships that is unclear was also identified as limiting the effectiveness of enforcement mechanisms:

- In **Austria**, there is no separate 'traineeship legislation'. Stakeholders interviewed for the case study (national authorities and employer organisations) called for a clearer distinction in law between the different types of traineeships, especially with regard to whether they constitute a training or employment relationship, in order to ensure that monitoring and enforcement can be carried out correctly.
- Similarly, in **Ireland**, there is no specific traineeship legislation for open market traineeships. Labour inspectorates are thus only responsible for monitoring whether there are violations of the National Minimum Wage legislation in traineeships and have no remit to ensure that other standards of traineeships are enforced.
- Even in countries where traineeships are the subject of specific legislation, the complexity or lack of clarity of what constitutes a traineeship can limit the effectiveness of enforcement. In **Spain**, the current regulation outlines that all trainees without a labour contract that are compensated must be registered with the social security. This has been labelled by a range of stakeholders consulted as 'blurry' with the Labour Inspectorate in particular highlighting that

¹³² Monitoring of implementation of voluntary practice was started in Lithuania since the beginning of 2015 and continued for 3 years - during 2015-2017. After adaptation of the new Law on Employment in the mid 2017 legislation governing voluntary practice was improved and accordingly it was decided that there is no need to continue monitoring of voluntary practice further. Currently only analysis of numbers of participants of voluntary practice is recorded by State Social Insurance Board and time to time analysis of this information is performed by the Ministry of Social Security and Labour.

unclear legislation means they cannot identify whether fraud/abuse is taking place. The lack of clarity of legislation was also highlighted by employer organisations in Spain.

Unclear roles and responsibilities: The often indistinct definition of open market traineeships and unclear regulatory framework may also lead to a lack of clarity on who is responsible for enforcement of traineeship legislation. This emerged clearly as an obstacle to effective enforcement in **Belgium**, where there are ambiguities and misunderstandings on the ground in terms of which national body, and at which governance level (federal or regional) is responsible for monitoring enforcement. In **Italy**, similar challenges exist due to a reported lack of cooperation between different national authorities that makes it difficult to carry out controls effectively.

Impact of weak enforcement mechanisms in Spain

According to the Labour Inspectorate and to most stakeholders consulted in **Spain** during the study, the use of traineeships to replace regular jobs is widespread in Spain. The limitations of current enforcement mechanisms do not allow authorities to identify a high number of cases of this abuse, however. The Labour Inspectorate is not entitled to carry out random inspections of companies to check whether traineeships are used to replace regular jobs but can only investigate companies in response to a complaint. However, trainees are often reluctant to complain as they do not know their rights, do not have information on where and how to complain and often accept illegal traineeship conditions due to a lack of other quality traineeship offers and the value given (even to low quality) traineeships by employers.

The evidence has also identified success factors of effective monitoring and enforcement systems, which tend to have the following characteristics:

Clear responsibility for monitoring from key national authorities: In all countries where effective enforcement and monitoring mechanisms for ALMP traineeships exist, these are largely credited to the key role that the Public Employment Services (PES) and/or authorities responsible for education and training play in organising, monitoring and regulating this type of traineeship, in contrast to open market traineeships. Evidence from the interviews and the case studies shows that the involvement of these authorities, both on a local and a central level, is key in ensuring effective monitoring and enforcement as indicated in the box below.

Monitoring and enforcement of ALMP traineeships in Lithuania and Ireland

In **Lithuania**, the main enforcement and monitoring mechanisms are organised by the local PES offices who sign a trilateral agreement, monitor attendance of the trainee every month, pay a grant as well as receive and analyse reports from traineeship supervisors. In addition to this, enforcement is ensured by the Division of Supervision of Measures and Services of the national PES who conduct spot checks of all ALMPs, including traineeships, going directly to workplaces and inspecting real conditions.

In **Ireland**, ALMP traineeships led by the Education Training Boards (ETBs) are monitored centrally by the State Agency for Further Education and Training (SOLAS) and there are Strategic Performance Agreements between SOLAS and the 16 ETBs which set out priorities and the contribution of the ETBs to the achievement of national further education and training targets. This provides a way to monitor ETB delivery of traineeships. The ETBs are also subject to external quality assurance reviews.

Mechanisms through which trainees can provide feedback: Involving trainees in the monitoring of the quality of traineeships also supports in ensuring effective enforcement takes place. In **Finland**, in addition to monitoring of ALMP traineeships by the PES, trainees compile and submit an evaluation following their traineeship. These are collected and analysed by the public employment and business services office. In **Latvia**, during the traineeship, a traineeship diary must be completed by the trainee, in order to keep track of how the traineeship is conducted in practice – i.e., what tasks the participant has performed and what skills the trainee has acquired. Evidence from the case study conducted for **Spain** suggests that the lack of formal process for the involvement of trainees in the monitoring of traineeships has a negative impact on the effectiveness of enforcement (see box above).

Monitoring the use of traineeships to replace regular jobs: There is also some evidence of monitoring and enforcement mechanisms being established with the aim of preventing traineeships being used to replace regular jobs. In **Italy**, regional legislation has been introduced that ‘rewards’ traineeship providers who hire their trainees by allowing them to take on new trainees. In **Ireland**, if an employer takes on ALMP trainees but never makes an offer of employment, this will be investigated by the authorized officers of the Education and Training Boards, who are a link between the employer and trainee. In **Luxembourg**, companies are legally required to have a register with all trainees and are only allowed to have a maximum of 10% of staff who are trainees. In **Denmark**, all traineeship providers have to be vetted by the municipal PES, and an employee representative in the workplace must sign declaration stating that there is a fair balance between the number of trainees and the number of regular employees.

Monitoring and enforcement of open market traineeships in Greece

In **Greece**, the recent introduction of a registration systems for all employers taking on trainees has supported sufficient national and institutional safeguards to prevent substitution of regular staff by trainees. The enforcement mechanisms activated by the Labour Inspection Body (SEPE) to ensure minimum wage, social security and decent working conditions, as well as the obligation of employers to declare their trainees and traineeships in the information system of the Ministry of Labour ‘ERGANI’ to prevent undeclared work, are considered in the national approach as important conditions for ensuring the quality of traineeships. The ERGANI electronic system has helped significantly because traineeships, trainees, companies or organisations, and any changes to the terms and duration of the traineeship are now recorded, which facilitates monitoring and control as well as the collection and publication of relevant statistics.

Evaluation question: Is there evidence of adverse effects of traineeships, and/or specific legislative frameworks and/or specific national quality frameworks too?

There is some evidence that traineeships can have an adverse effect though the study has not been able to link these adverse effects as a direct consequence of implementation of the QFT. Analysis of stakeholder consultations and existing studies¹³³ has found that in some cases **traineeships can replace regular jobs**. The study found evidence of this in the following cases:

- In **Ireland**, the system of regulation and monitoring of the traineeship programme JobBridge was criticised regarding concerns that the scheme had led to displacement, that is, the loss of jobs in other enterprises due to the competitive advantage given to organisations using JobBridge¹³⁴ and, substitution, whereby employers replaced paid staff positions with unpaid trainees hired through the programme¹³⁵¹³⁶. Many of the traineeships were in low-skilled jobs with the Department of Social Protection reported to have investigated 200 companies for abuse of the scheme in this way¹³⁷.
- In **Spain**, reports of traineeships replacing regular entry-level jobs for young people were made by the Labour Inspectorate, trade unions, student representatives and the Youth Council interviewed for this study. Stakeholders reported that some training companies train young people (with PES subsidies) and provide open market traineeships in their own company; or that traineeship providers reach out to young people looking for traineeships, requiring them to register as unemployed and to register for a training course payment) and

¹³³ See for example ILO paper: https://www.ilo.org/wcmsp5/groups/public/---ed_emp/documents/publication/wcms_635740.pdf

¹³⁴ For example, one Dublin based mechanics advertised for 28 internships during the lifetime of the scheme, equivalent to saving EUR 273,308 in labour costs at minimum wage pay rates [cited in Arlow, J [2022] Is the Work Placement Experience Programme just a new version of JobBridge? Nevin Economic Research Institute, 25 May 2022]

¹³⁵ Arlow, J [2022] Is the Work Placement Experience Programme just a new version of JobBridge? Nevin Economic Research Institute, 25 May 2022

¹³⁶ O’Sullivan C (2016) Job Bridge didn’t have enough checks to stop exploitation, Irish Examiner, 22 August 2016

¹³⁷ O’Dwyer D (2016) The Question: Did JobBridge do its job? The Irish Times, 22 October 2016

provide them with a low quality traineeship. Focus group with students also revealed this, to the extent that some companies (called informally among them “*empresas cárnicas*” – “meat companies”) are known in certain fields (such as ICT) for engaging young students as trainees, who in reality are actually responsible for key tasks in the business and replace regular workers.

There is also some evidence that **traineeships can prolong the labour market transition for young people and drive labour standards down:**

- A 2018 evaluation of a traineeship scheme in **Croatia** used a difference-in-difference analysis¹³⁸ to estimate the effect of the traineeship measure on three different labour market outcomes – employment, unemployment and inactivity. The traineeship scheme was very widely “*perceived as almost an exclusive pathway of (first) labour market entry for youths in Croatia, especially for university graduates*” at the time¹³⁹. The analysis found that the scheme had a neutral effect in terms of employment and unemployment probability, and some indications that the **probability of inactivity actually increased due to the measure**¹⁴⁰. The reason for this has been linked to low wages of trainees (210 and 315 euro, which at the time was 29% and 43% of the average net wage) which de-stimulated young people from taking part in the programme and thus rendered them inactive. The impact on wage standards was also noted, with stakeholders highlighting that the scheme lowered labour costs of young people and other workers.
- Further confirming this possible adverse effect, is evidence from **Slovenia**, where the prohibition of ‘voluntary traineeships’ was seen as favourable by some stakeholders, in particular trade union representatives and youth organisations, as it allowed young people to enter the labour market with a first job directly, avoiding this intermediate phase of transition that prolongs integration.

The research for this study has also found some evidence that **mechanisms to enforce traineeship standards/legislation may also have an adverse effect by either reducing the supply of traineeships or leading traineeship providers to find loopholes in the law which in turn limit the proper application of other quality principles**. Whilst these adverse effects are not directly caused by implementation of the QFT, but rather by traineeship legislation in general, they are worth noting given that they affect implementation of quality traineeships in the country in general.

- **Reducing the supply of traineeships:** Employer representatives consulted during the study outlined that legal or administrative procedures arising from enforcement and monitoring demands may discourage companies from taking on trainees, a view also evidenced in positions of EU level employer organisations¹⁴¹. This was seen as a concern by employer representatives in **Lithuania, Spain, Portugal** and **Romania** and EU level employer organisations. In **Romania**, for example, sanctions are in place if an ALMP traineeship provider is found not to be upholding traineeship standards after inspection. Stakeholders interviewed reported that the fear of these sanctions – which involve having to return any subsidies received to offer traineeships – deters some employers from participating in ALMP traineeship schemes at all.

¹³⁸ Difference-in-difference analysis is a key method used in randomised control trials, natural experiments, and quasi-natural experiments. It allows estimation of the effect of an intervention while controlling for pre-existing differences across groups (eliminating selection bias) and time-varying factors.

¹³⁹ Ibid.

¹⁴⁰ Tomić, Iva & Zilic, Ivan. (2018). Working for 200 euro? The effects of traineeship reform on labour market outcomes in Croatia. EIZ-WP-1804. <https://hrcak.srce.hr/file/300843>

¹⁴¹ Communication From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions Towards a Quality Framework on Traineeships Second-stage consultation of the social partners at European level under Article 154 TFEU <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX%3A52012DC0728>

- **Impacting other quality standards:** Some evidence of enforcement mechanisms encouraging traineeship providers to circumvent legislation through other means was also identified. In **Spain**, the case study found that companies have reportedly encouraged trainees to register as unemployed so that they can hire them as ALMP trainees in order to benefit from subsidies available for companies offering ALMP traineeships. In **Germany**, since the introduction of the minimum wage legislation in 2015 which applies to traineeships (though not a result of the QFT, or required by it), there have been reports of traineeship providers attempting to bypass minimum wage legislation by shortening traineeships to a maximum duration of three months.

Quality traineeships and the impact on trainees

Evaluation question: What is the impact on trainees? How effective do (ex-)trainees perceive traineeships (and/or specific legislative frameworks and/or specific national quality frameworks) to be in terms of facilitating a stable labour market integration for young people, and contributing to youth employment?

It is not possible to ascertain the impact of the implementation of the QFT itself on trainees due the multiple factors which influence trainees' experiences and outcomes of their traineeships. Nonetheless, there is **evidence that the quality of traineeships since 2014 has overall increased, as per the objective of the QFT, with a positive impact on trainees**, though this is not necessarily the case across all Member States (see section 3.2).

The trainee survey conducted for the study sheds light on the state of traineeships today. A comparison of the results of this survey with the results of the Eurobarometer survey conducted in 2013 can shed light on how key aspects of traineeship quality and impact have evolved since then. The data in the table presented below must be interpreted with a high degree of caution as the surveys are not comparable neither in methodology nor in the questions asked. However, the comparison corroborates findings from other research tasks which show that some improvements to the quality of traineeships can be seen since 2014, particularly in terms of the provision of a written agreement, and the learning and job outcomes of the traineeship.

Table 17. Traineeship quality 2013 and 2022 - an indication of progress from two (non-comparable) surveys

	Eurobarometer Survey, European Commission, 2013	Survey of trainees, Ecorys, 2022
Learning outcomes	81% of respondents consider they have learned things are useful professionally during their traineeship (2805 out of 3464 respondents).	85% of respondents felt that they learnt things that are useful professionally during their traineeships (1560 out of 1836 respondents)
Job outcomes	27% of respondents who completed a traineeship were offered an employment contract at the end of their traineeship (1605 out of 5945 respondents)	42% of respondents indicated that they were offered a job after their traineeships (771 out of 1836 respondents)
Written agreement	61% of respondents signed a written traineeship agreement or contract with the host organisation or company (2113 out of 3464)	72% of respondents signed a written agreement at the beginning of their traineeships (1322 out of 1,836)

Source: Ecorys 2022 and European Commission (2013), Flash Eurobarometer 378: the experience of traineeships in the EU.

The evidence from other research tasks – interviews, desk research, case studies – also found that **participating in a traineeship has a positive effect on trainees' employability**. Available monitoring data from specific traineeship programmes identified in the mapping and listed in Table

18 below shows that participating in traineeships has a positive impact on learning outcomes and job outcomes.

Table 18. Impact of traineeships (regardless of alignment with the QFT or not) on young people's labour market integration

Country	Scheme	Impact on labour market integration
Cyprus	ALMP traineeship for unemployed secondary school graduates and degree holders	Over three years, 60% of the trainees were hired by the same employer following completion of their traineeship.
Slovakia	Graduate traineeship programme	Between 2014 and 2020, of the 38,766 trainees who completed their graduate traineeship, 22,956 were placed on the labour market within 6 months of the end of their traineeships, amounting to a 59% success rate.
	School Graduate Practice	Results of a counterfactual impact evaluation conducted of the Allowance for School Graduate Practice Performance show that participants of the Graduate practice had an average wage of EUR 278.19 higher than the non-treated young jobseekers in the control group. It was also statistically observed that the average monthly wage of women who participated in the Graduate practice was 37.4% higher than the average wage of women who did not participate in the Graduate practice. In the case of men, the difference was even higher, namely 48.9% in favour of the participants. ¹⁴²
Italy	Traineeship measure under the Youth Guarantee	45% of young NEETs who started and concluded a traineeship are employed at the end of the reference quarter and 70.4% of employment relationships are of a stable nature (open-end and apprenticeships) ¹⁴³
Latvia	ALMP training programme (under the Latvian Youth Guarantee scheme)	50% of all young participants enter employment relations within six months after finishing training programmes. ¹⁴⁴
	ALMP traineeships	An OECD study evaluating all ALMP measures in the country found that participants in ALMP traineeships have a higher starting salary when they find employment compared to those who have not participated in a traineeship ¹⁴⁵ .
Bulgaria	Traineeship measures under the Youth Guarantee	An assessment of the individual net effect carried out in 2017 indicated that the traineeship measure was highly effective in exiting unemployment – with the net effect of 17.7 percentage points ¹⁴⁶

¹⁴² <https://www.mdpi.com/2227-7390/10/9/1442/pdf?version=1650884683>

¹⁴³ <http://www.anpal.gov.it/Pagine/default.aspx>

¹⁴⁴ M. Bratti, C. Ghirelli, E. Havari, J. Leikucs, G. Santangelo, N. Strautmanis, (2018). Vocational training and labour market outcomes: Evidence from Youth Guarantee in Latvia, 29037 EN, Publications Office of the European Union, Luxembourg, <http://publications.jrc.ec.europa.eu/repository/bitstream/JRC110247/kjna29037enn.pdf>

¹⁴⁵ <https://doi.org/10.1787/6037200a-en>

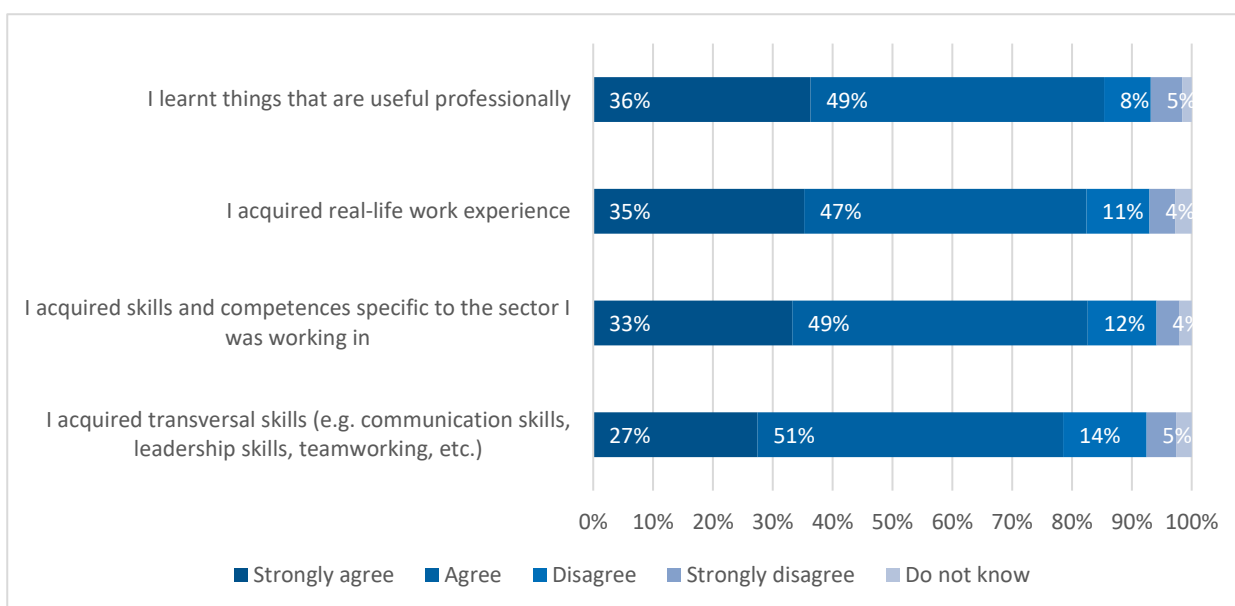
¹⁴⁶ Ministry of Labour and Social Policy, (2017). Elaboration of a Subsequent Assessment of the Effect of the Active Labour Market Policy Financed by State Budget Resources at Individual Level (Net Effect), https://www.mlsp.government.bg/ckfinder/userfiles/files/politiki/zaetost/strategii%20izsledvaniq%20otchet/Final_Report_en.pdf

Ireland	CT pilot programmes	<p>An evaluation of the CT pilot programmes in March 2018 found that the CT model had been “effective and efficient in the design, development and delivery of training” in that, using indicators such as completion rates and employment and skills outcomes of traineeships:</p> <ul style="list-style-type: none"> • Of the 164 trainees who had completed CTs overall, 94% were employed after the programme ended. • Employers praised the commitment, skills, and job-readiness of the trainees on completion¹⁴⁷. • For trainees, the evaluation found that the CT model offered “an opportunity to enhance knowledge, skills, and competence, to gain tangible work experience and proficiency in applying those skills and capabilities in real work settings, and access to employment as well as recognised qualifications to support future career ambitions”¹⁴⁸.
Lithuania	ALMP traineeship programme	<p>According to information provided by the PES and the Ministry of Social Security and Labour in 2021, after 1 month of participation in an ALMP traineeship, 54.4% of 16-29 years old participants were in employment; after 6 month - 63.9%, and after 12 months - 65.8%.</p>

Source: Ecorys, 2022, compiled from different sources, as referenced.

Trainees themselves also hold positive views of traineeships. 85% of respondents to the trainee survey agreed that they learnt things that are useful professionally during their traineeship, whilst 83% of respondents agreed that they acquired real-life work experience through undertaking their traineeship (see Figure 6).

Figure 6. Share of respondents to the trainee survey according to degree of agreement with the following statements on traineeship outcomes. Q: To what extent do you agree with the statements



below?

Source: QFT online survey 2022, N=1836

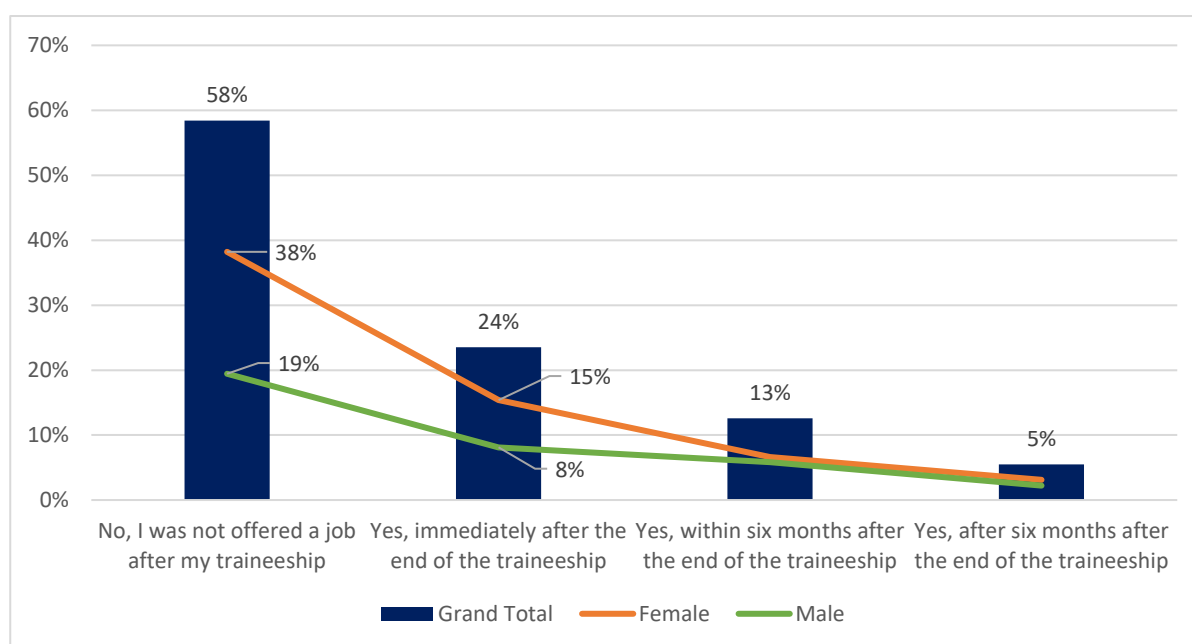
¹⁴⁷ Ibid.

¹⁴⁸ Ibid

This is substantiated by evidence from the focus groups conducted in selected case studies. In **Bulgaria**, focus group participants saw the acquisition of transversal skills as a key asset, in particular highlighting the ability to do things better and quicker, to communicate more precisely, to take responsibility, to develop entrepreneurial skills and to develop learning to learn skills i.e., being able to get out of one's comfort zone through performing new tasks every day. In **Ireland**, all focus group participants reported very positive impacts and experiences from their traineeship, including greater self-confidence both in work and also in re-entering the labour market following a period of absence.

Nonetheless, evidence shows that whilst traineeships clearly support labour market integration by increasing employability and related skills, **they do not provide a guaranteed access to the labour market**. The majority (58%) of respondents (n=1836) to the trainee survey reported that they were not offered a job after their traineeship. Women were more likely to report this, as seen in Figure 7.

Figure 7. Job offers following the traineeship, by gender (N=1836)



Source: Survey of trainees, Ecorys 2022

Nonetheless, of the 42% of respondents who indicated that they were offered a job after their open market traineeships, 65% indicated that they secured the role through the same employer they worked for during the traineeship and 27% from an employer they got in touch with during their traineeship. This suggests that participating in the traineeship itself was key in securing a job following completion.

The following principles have been found to have a particularly positive impact in fostering young people's stable labour market integration.

- 1. The learning and educational element.** Evidence from the interviews, focus groups and trainee survey point to the key role that learning and educational objectives of traineeship play in traineeship outcomes. There is consensus on this across the social partners. For example, **employer organisations** interviewed (e.g., in IT, LT, HU) highlighted that the learning objectives are key. In **Italy**, for example, the possibility of connecting a traineeship to learning outcomes included in the *AtlanteLavoro* – the Italian National Register of qualifications - is an added value because it allows for certifying skills acquired and thus has a direct impact on

employability. The importance of this was also raised by EU level employer organisations consulted during the expert and validation meeting, who raised that “structuring [traineeships] in a way that helps to train people in the skills needed on the labour markets is where the real added value of traineeships and the QFT lies”¹⁴⁹ **Trade union representatives** interviewed in several Member States (e.g. NL, HR, BG, FR, PL) also identified the educational element of quality standards for traineeships, in particular the principle outlining the need for a tutor/mentor as key.

Trainees themselves value the learning and educational aspect of traineeships. 80% of respondents to the trainee survey agree or strongly agree that the tasks they had to undertake during their traineeship helped them achieve their learning and training objectives, as well as gain practical experience and relevant skills. The possibility of trying out different tasks and having access to training opportunities were the most frequently selected elements considered important/essential for trainees in their traineeship (selected by 89% and 85% of respondents to the survey respectively).

2. **The written traineeship agreement:** the requirement to have a written agreement between traineeship provider and trainee also clearly emerged as an important principle in positive traineeship outcomes. The importance of transparency on rights and obligations was reported as key for trainees and employers alike. Representatives from the PES in particular highlighted that having a traineeship contract, with clear educational objectives and standards, helps trainees understand what it is expected of them, so that they can meet workplace requirements and increase their chances of obtaining employment following the traineeship. Stakeholders from **Poland** highlighted that the principle of an agreement is key in that it has formalises the process that employers need to go through to take on a trainee and thus encourages a more systematic approach that supports higher quality experiences for young people.
3. **The duration of the traineeship:** the duration of the traineeship also emerged as a key principle in ensuring positive impact in terms of young people’s employability, but **views were mixed on the optimal length.**
 - In **Luxembourg**, where legislation was specifically implemented to ensure alignment with the QFT, trade union representatives and representatives from a Chamber of Commerce highlighted the positive impact of establishing a maximum duration of six months for the traineeship, as it prevents employers from replacing normal work contracts with trainees and thus supports the creation of fairer and more decent work opportunities for young people.
 - In contrast youth stakeholders interviewed from **Greece** suggested that a limited duration hinders the young person’s employment prospects, proposing instead that a 1- or 1.5-year traineeship could better allow the trainee to gain significant work experience and build a long-term relationship with the employer. Similar views were expressed in answers to open questions in the trainee survey, where some respondents mentioned that the length of traineeships could be extended to give them more learning opportunities.
 - In **Denmark**, where the duration of ALMP traineeships can be very short (4 weeks), employer representatives highlighted that this poses an obstacle as employers do not want to take on a trainee for such a short time as there is little chance that the trainee will contribute to the business in this time.

¹⁴⁹ Input from Business Europe following the validation workshop conducted in September 2022.

Impact of the QFT on specific sectors and groups

Evaluation question: How equally are the effects of the QFT, by way of national legislative frameworks and/or national quality frameworks, distributed within Member States? Are there sectors for which the QFT has proven to be particularly successful or unsuccessful?

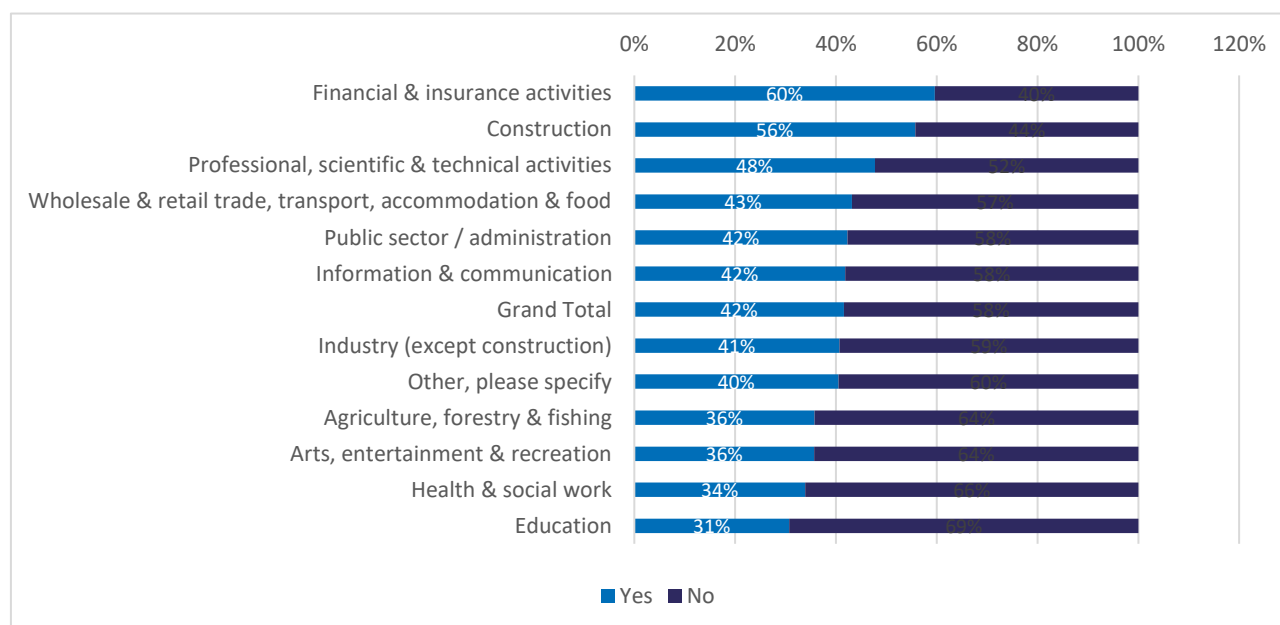
It is difficult to systematically assess how equally the effects of the QFT are distributed within Member States. This is because 1) the degree to which the QFT itself has led to national legislative frameworks cannot be ascertained and 2) robust monitoring systems for traineeships are not in place in a vast number of Member States, particularly for open market traineeships, meaning that quantitative data on the number and the characteristics of participants in traineeships, the distribution of traineeships across sectors, and the effects of these traineeships are not available.

Nonetheless, the qualitative evidence collected for this study provides an indication of whether the QFT equally affects different subgroups of society and different sectors of the economy.

Distribution across sectors

Stakeholders consulted for the study had limited views/knowledge on sectoral differences in the quality of traineeships in their countries, citing the lack of monitoring/data on traineeship prevalence as the main reason for this. Nonetheless, some recurring sectors emerging in the qualitative data as being more prone to low quality traineeships. This is seen firstly in the evidence from the trainee survey. When asked whether they agree that their traineeship made their transition from school to work easier, respondents to the trainee survey working in **arts, entertainment and recreation** and **health and social work** were most likely to disagree that this was the case (33% both). Most likely to agree with the statement were trainee respondents from the financial and insurance sector and Information and communication sectors. (72% and 71%). These findings are mirrored when examining the actual outcomes of the traineeship following completion. Trainees in the financial and insurance sector were most likely to report that they had been offered a job after their traineeship (60% of respondents in the sector), followed by those in construction (56%). Trainees in **education** were most likely to report that they had not received an offer of a job after their traineeships (69%), followed by those in **health and social work** (66%) and **arts and entertainment** (64%).

Figure 8. Results of the trainee survey: where you offered a job at the end of your traineeship, by sector

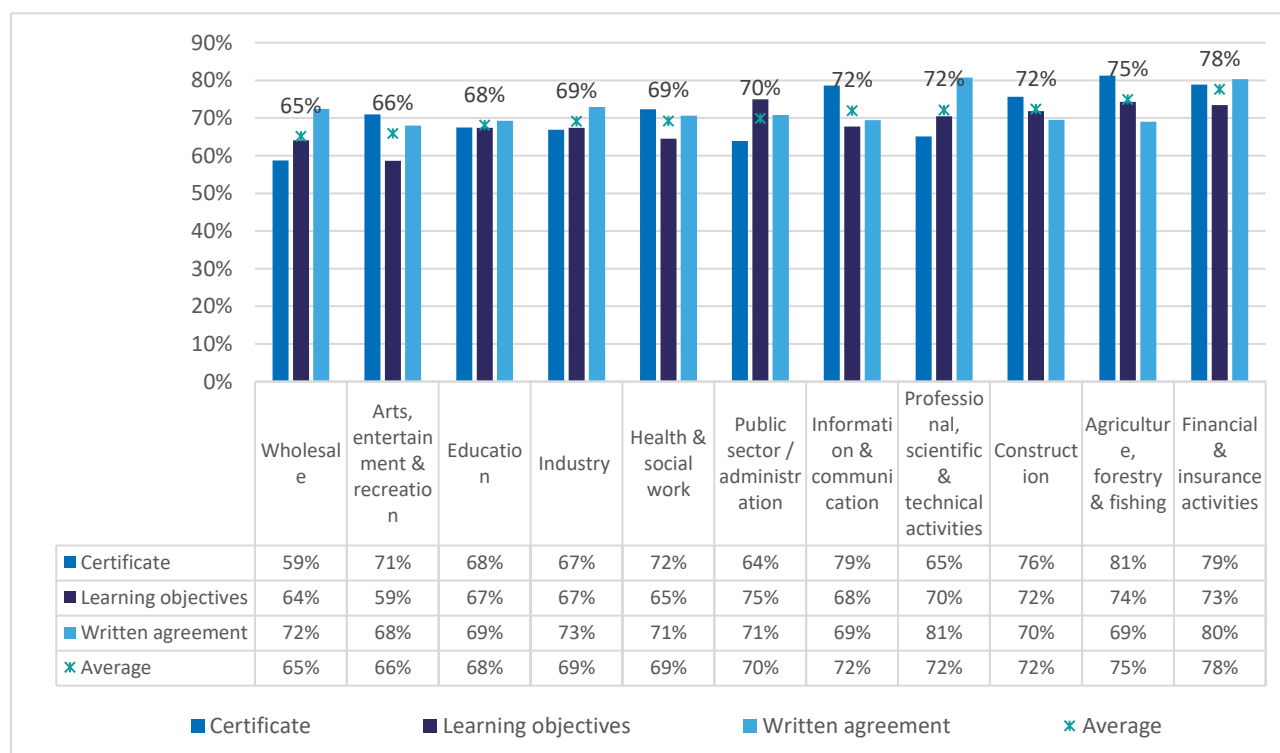


Source: Survey of trainees, Ecorys, 2022

Evidence from the interviews and case studies with national stakeholders corroborates these findings. In **Austria**, the case study shows that there are some sectors which are more prone to precarious traineeships than others, namely, media, social care, healthcare and arts. In other countries, stakeholders pointed out that sectoral differences exist due to the differences in the size of companies across sectors. In **Greece**, the case study found that very small enterprises (with fewer than nine employees) face challenges in offering quality traineeships as they have limited management capabilities and cannot handle the costs related to the administrative burden of ensuring a quality traineeship. This view was shared by **employer organisations** at the national and EU level. A representative from an employer organisation in **Czechia** outlined that traineeships are of higher quality in the service industry, because this does not generate additional costs, in comparison to heavy industry sectors where costs are higher given training, health and safety requirements and equipment and infrastructure needs. The EU employer organisation SME United agreed that costs of implementing the QFT for employers in crafts and small and medium sized enterprises are high, in particular in terms of administrative costs.

When examining the degree to which respondents' traineeships covered three principles of the QFT, namely the provision of a written agreement, the stipulation of learning objectives, and the provision of a certificate at the end of the traineeship, differences between sectors are visible. The 'best performing' sectors are the financial & insurance sector, followed by agriculture, whilst the 'least performing' sectors are **wholesale** and **arts, entertainment and recreation**, as seen in Figure 9.¹⁵⁰

Figure 9. Results of the trainee survey: did your traineeship have a written agreement, learning objectives, certificate (average across three principles)



Source: Survey of trainees, Ecorys, 2022

¹⁵⁰ The figure shows the share of respondents who agreed that their traineeship had each of the provisions listed. An average of these shares has then been calculated in order to provide an estimated 'ranking' of sectors.

Distribution across social subgroups

There is **substantial evidence that the QFT is less successful for certain sub-groups of young people** because it does not directly address key obstacles to accessing traineeship opportunities. A diverse range of stakeholders from across multiple Member States reported that **vulnerable young people are less able to benefit from traineeships as they cannot undertake them**. There are various reasons for this:

1. Lack of financial compensation for undertaking a traineeship: the most commonly reported reason for traineeships being less accessible to certain subgroups was the lack of financial compensation for undertaking a traineeship. This impacts several subgroups of young people as further explained in the examples below:

- In **Bulgaria**, the case study found that young people from **rural areas** are less able to access traineeships as they cannot afford to move to urban centres without compensation, which may lead them to take paid jobs for which they are over-qualified instead of traineeships linked to their field of study.
- National authorities interviewed in **Romania** raised a similar concern, highlighting the need for additional financial support so that a young person can undertake a traineeship away from their hometown.
- In **Croatia**, youth organisations and trade unions interviewed highlighted that traineeship opportunities are less accessible to youth living in **rural areas** or islands. As young people have no guarantee that they will be hired following a traineeship, if they do not already live close to the traineeship position, they will not move in order to pursue the traineeship. This hinders their job finding opportunities and favours young people from urban centres
- An employer organisation and a youth organisation in **Latvia** highlighted that as remuneration is not foreseen, traineeships are less effective for youth from **low-income families**.
- When examining the results of the trainee survey, the most commonly reported way of finding traineeships was via the trainees' own network, i.e., through friends, acquaintances, or families (33% of respondents). This further suggests that young people without such networks are likely to be less able to access traineeship opportunities.

2. Lack of specific, tailored measures to support individual vulnerable groups: the second most commonly reported reason for traineeships being less accessible to certain subgroups is the lack of specific measures that tailor traineeships to their needs:

- A national authority from **Italy** highlighted that the QFT is 'by nature' less successful for vulnerable groups because it is a framework designed for all young people. They highlighted that as traineeship programmes are not targeted specifically at young people with lower educational attainment, traineeship providers will prefer to host trainees that are the most skilled and/or educated.
- In **Croatia**, a national authority stated that, as there are no dedicated measures that take into account intersectionality, that is the characteristics of being young and belonging to the one of the vulnerable groups, key subgroups of young people, including young people from ethnic minorities, with disabilities and with a lower educational attainment do not benefit from the QFT. Efforts are being made in Croatia under the Recovery and Resilience Facility, to focus on including the most vulnerable groups in ALMP and PES services, however.
- In **Bulgaria** and **Spain**, the focus groups conducted for the case studies found that traineeship providers do not necessarily comply with accessibility requirements (e.g., wheelchair). One trainee in Spain with a visual disability asked for an adequate computer screen, which was not provided.
- A representative of a trade union in **Finland** underlined that, for people who have limitations in their ability to work (e.g., due to a disability), a duration limit of six months for the traineeship may not be suitable.

- Research on a traineeship programme in **Slovakia** found that the disadvantage that young people from a lower educational background face is not only in access to traineeships, but also in the effect of traineeships: the effect of the traineeship on labour market outcomes is higher for university graduates than for secondary school studies, with the employment rate of graduates undertaking a traineeship at 80%, compared to that of high school students at 62%.

Traineeship regulation that does have specific provisions to address obstacles faced by vulnerable groups was identified in the research, as outlined in the box below.

Tailoring traineeship programmes to the needs of vulnerable young people

ALMPs traineeships in **Latvia** must have an employment contract in accordance with the Labour Law (the same, in fact, should be in case of OMT). The employer providing ALMP traineeships receives a grant for the supervisor, a subsidy for training the trainee and must report on acquired skills. The duration of ALMPs traineeships is 4 months and only young people with EQF level 1-3 can take part (basic to secondary VET education level). A grant from the state is also awarded to provide the trainee with a salary of 300 (qualification level 1) or 350 EUR (qualification level 2-3) per month. For a disabled trainee, the state also provides support for making adjustments to the workplace up to the value of 1000 EUR.

In **Ireland**, a small number of paid internships within the civil service are reserved for individuals from underrepresented groups including Travellers and those with a disability¹⁵¹¹⁵².

In **Italy** the duration of a traineeship is maximum of 12 months. However, this is extended to 24 months for disabled people to take into account additional time they may need to acclimate to the workplace.

Comparing the QFT to the EFQEA

Evaluation question: While taking into account the differences in objectives and target groups, has one of the two quality frameworks, the QFT or the EFQEA, been more effective in improving the quality of traineeships and apprenticeships respectively, as well as the employability of trainees and apprentices, and why?

The EFQEA (European Framework for Effective and Quality Apprenticeships) is the quality framework for apprenticeships published, like the QFT, in the form of an EU recommendation¹⁵³. The recommendation dates from March 2018, almost exactly four years after the QFT recommendation. The EFQEA sets out 14 criteria for quality and effective apprenticeships which Member States are encouraged to build on, as well as recommendations for implementation at national level, support services, awareness-raising, funding and follow-up. The criteria are divided into 7 criteria for learning and working conditions and 7 criteria for framework conditions.

There are **many similarities between the two frameworks**, for example addressing dimensions such as the written agreement, learning objectives (QFT) or outcomes (EFQEA), transparency and working conditions, as well as EU-level monitoring and cooperation with other key stakeholders. However, despite these apparent similarities, there are also several key differences, linked to the different nature of traineeships and apprenticeships, but also potentially other factors including the way in which the frameworks were developed. The **EFQEA contains recommendations which are more direct**: for example, it specifies that “In-company trainers *should* be designated” (§3)

¹⁵¹ Houses of the Oireachtas (2022), Public sector staff, Dáil Éireann Debate, 1 March 2022. Available at: <https://www.oireachtas.ie/en/debates/question/2022-03-01/270/?highlight%5B0%5D=internships&highlight%5B1%5D=internships&highlight%5B2%5D=internships>. Accessed 20 July 2022.

¹⁵² Houses of the Oireachtas (2021) Topical Issue debate; Dáil Éireann debate, 15 July 2021. Available at: <https://www.oireachtas.ie/en/debates/debate/dail/2021-07-15/36/?highlight%5B0%5D=internship#s38>. Access 20 July 2022.

¹⁵³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32018H0502%2801%29>

whereas the QFT “*encourages* traineeship providers to designate a supervisor for trainees” (§5). Similarly, the EFQEA recommends that “Before the start of the apprenticeship, a written agreement *should* be concluded to define the rights and obligations of the apprentice” (§1), while the QFT recommends that Member States “*encourage* the concerned parties to ensure that the traineeship agreement lays down the rights and obligations of the trainee” (§9). The EFQEA also contains elements which are not found in the QFT, such as awareness-raising (§12) or quality assurance approaches (§14). The implementation of the EFQEA is also supported by a European level network, the European Alliance for Apprenticeships (EAfA), whereas no such network exists in the field of traineeships.

Traineeships and apprenticeships differ in many ways: apprenticeships are generally considered part of initial VET, lead to recognised diplomas, and are therefore more regulated, whereas traineeships are extremely diverse and often much less regulated. Traineeships, particularly those offered within ALMPs, often target young people who are further removed from education and the labour market. However, even allowing for the different target groups and objectives of the two frameworks, **most stakeholders consulted for the study who expressed an opinion on this topic considered that the EFQEA has been more effective than the QFT** in achieving improvements in quality. Several potential explanatory factors for the greater effectiveness of the EFQEA have emerged from the research and are set out below.

- Firstly, there is a **more collaborative institutional and stakeholder cooperation context** which supports the implementation of the EFQEA and individual apprenticeships. There is greater involvement of key stakeholders (social partners, representatives of industry, policymakers, experts) around apprenticeships at EU and national level. At the level of individual apprenticeships, there is also necessarily cooperation between employers and education or training institutions since apprenticeships are part of education/training systems, whereas training providers are not always involved in the traineeships covered by the QFT (which are outside formal education and training curricula). Such cooperation fosters and provides natural settings for dialogue and focus on the EFQEA criteria. One stakeholder noted that the EFQEA “has greater value” because it was developed through a process involving multiple stakeholders; it should of course be noted however that the more recent development of the EFQEA may mean that stakeholders remember this process better than the development of the QFT (which dates from some 4-5 years previously), so comparisons are difficult. Several stakeholders have commented that the EFQEA benefits from the fact that it is supported by the trade unions.
- Secondly, the **EFQEA has a clearer scope**, and apprenticeships are more clearly defined. Despite the challenges in agreeing a definition of apprenticeships for the EFQEA, this definition is nonetheless more clearly delineated and recognised, and there are fewer types of apprenticeship to consider. In addition, the QFT does not cover all traineeships, excluding (as noted above) those which are part of curricula of formal education or vocational education and training. The fact that the QFT does not cover all types of traineeship is seen as weakening its impact and visibility.
- Thirdly, some stakeholders felt that, when the QFT was adopted, many of the principles were already enacted in some Member States, which **limited its relevance** and did not lead to a large step forward. In comparison, the EFQEA had more impact, especially in Member States where the definition of apprenticeships had been less clear, but also provided a useful framework and reference point for Member States who had already been implementing apprenticeships.

- Fourthly, the **higher degree of regulation in apprenticeships**, and the fact that they are generally considered as employment contracts, means that the implementation of the EFQEA is more widely supported by labour law and/or collective agreements.
- Fifthly, as noted above, **the EFQEA is implemented with the support of EAfA**¹⁵⁴, which is in turn supported by the Apprenticeship Support Services¹⁵⁵ provided by the European Commission. EAfA unites governments and key stakeholders with the aim of strengthening the quality, supply and overall image of apprenticeships across Europe, promoted through national commitments and voluntary pledges from stakeholders. More than 367 pledges have been registered since 2013. EAfA provides a strong network and forum of exchange to support the implementation of EAfA.
- Finally, several stakeholders (including national policymakers, EU level stakeholders, social partners and employers) considered that the EFQEA is more effective because it is **more specific, more direct, more concrete and more detailed in its recommendations**, providing a clearer framework. As noted above, while the QFT sometimes only “*encourages*” traineeship providers to consider certain dimensions, the EFQEA tends to more strongly assert that certain elements “*should*” be put in place.

Key **recommendations** which emerged from the consultations to date to improve the effectiveness of both frameworks included:

- Creating better linkages between traineeships and apprenticeships. For example, young people may approach the world of work firstly through a traineeship, and then may progress to an apprenticeship, but this type of trajectory is not clearly spelt out. Too often, traineeships and apprenticeships are in competition with each other, rather than in synergy.
- Companies should be encouraged to offer both traineeships and apprenticeships. It is considered that the quality of traineeships is likely to improve if delivered alongside apprenticeships.
- Ensure greater harmonisation between the quality criteria in the EFQEA and the QFT.
- Young people (i.e., the trainee and the apprentice) should be more clearly put at the heart of both quality frameworks. It should be clearer what they offer to individuals. Young people should also be given a voice in the monitoring and revision of these frameworks through a process of co-creation.
- The QFT would benefit from a network like EAfA supporting its implementation.

¹⁵⁴ <https://ec.europa.eu/social/main.jsp?catId=1147&langId=en>

¹⁵⁵ <https://ec.europa.eu/social/main.jsp?catId=1147&intPageId=5235&langId=en>

Efficiency

Key findings on efficiency

Analysis of the efficiency of the QFT is hampered by a lack of quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. The research attempted to assess the scale of costs and benefits through several elements of the study: Task 1 (targeted consultations), Task 2 (mapping), and Task 3 (case studies). The case studies provided the opportunity for more in-depth analysis of costs and benefits of the implementation of the Recommendation in selected Member States, using both qualitative and quantitative data where available. Most of these elements of the methodology were able to address the question of costs and benefits only via the perceptions of stakeholders, and in most cases such perceptions yielded only qualitative assessments of efficiency. Where quantitative assessments were provided and relevant, these have been fully used in the analysis.

As far as **benefits** are concerned, the study shows that **young people** have seen signs of improvements in the quality of traineeships through trainees being less exploited and gaining learning and skills which increase their chances of entering work. For **employers**, key benefits of applying QFT principles are: they enhance employer understanding of traineeship quality; they enhance employer reputation and increase their attractiveness to young workers; and they allow employers to effectively 'try out' workers for the job, without paying a full wage. There are also **benefits to society** from reduced unemployment and improved school-to-work transition.

Looking at **costs**, **employers** reported adjustment costs linked to supervising trainees, assessing and certifying trainees' skills, and developing training plans. In cases where these costs are subsidised or reimbursed, applying for and managing the subsidies itself involves administrative costs, especially for small companies. The dominant view was that **QFT-related costs for employers were small, overall**. However, costs are likely to be more significant for small organisations with fewer resources to devote to understanding traineeship requirements and supervising trainees; and higher for open market traineeships than for ALMP traineeships given that the latter offer many more financial instruments and financial support for employers, limiting the costs they must bear.

For **national authorities**, implementation costs of the QFT was mainly centred on enforcement costs, including direct labour costs associated with designing programmes, implementing new legislation, and investing in public services and labour inspectorates to monitor compliance; while recurrent costs include the costs of subsidies and grants to support traineeships.

The **obstacles** to employers of offering traineeships centre around regulatory and administrative complexities in offering traineeships. Employers highlighted the complexity of existing legal frameworks on open market traineeships, and administrative challenges of managing cooperation with PES and financial incentives (for ALMP traineeships). Challenges around a lack of capacity to apply the learning elements to the traineeship were also cited as common obstacles across both types of traineeships.

Nevertheless, overall, the evidence indicates that the **administrative burden of QFT implementation is generally proportionate to the benefits**. A key reason is that total costs associated with the QFT are low whereas benefits, especially potential future benefits, are potentially large. The proportionality of costs to benefits, and therefore efficiency, do however vary with several factors:

- Efficiency is achieved only if the QFT promotes higher quality traineeships.
- QFT implementation is less efficient for small and medium-sized enterprises than for large firms
- Efficiency is greater if employers are incentivised to offer a job to a young person following a traineeship may increase efficiency

The evidence also implies that it would be difficult to reduce the overall administrative burden

associated with QFT without also reducing the scale of the benefits.

In this section we consider the efficiency of the QFT by looking at what can be identified about its benefits (for young people, employers and society) and the costs faced by actors involved in its implementation.

Limitations of the data

The exercise has been hampered by lack of relevant data in particular, quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. The research attempted to assess the scale of costs of benefits through several elements of the study: Task 2 (mapping), Task 1 (targeted consultations) and Task 3 (case studies). The case studies provided the opportunity for more in-depth analysis of costs and benefits of the implementation of the Recommendation in selected Member States, using both qualitative and quantitative data where available. At the interim phase of the study, given the lack of quantifiable data gathered to date further efforts were made to gather quantitative evidence of costs and benefits as follows (and further detailed in Annex 1):

- Adaptation of the case study templates and the case study interview guides to add additional questions on quantifying costs and benefits following the feedback received at interim phase.
- Provision of additional guidance to the national experts conducting the interviews and the case study research on how to gather costs and benefits data, in consultation with the study' labour economist.
- Regular consultations with the study labour economist to explore all possible options for quantifying costs and benefits and ensure that the research tools were able to gather this data. This included suggestions on how to overcome a lack of data, through for example: *"If not possible to estimate costs, can you give an indication of the amount of the costs relative to a benchmark (e.g., the average salary of someone in the level of job to which the traineeship is targeted)?"*
- Revising the agenda of the expert meeting and the validation workshops to cover also costs and benefits with participants.
- Targeting of EU employer organisations to ensure their attendance at the validation workshop and direct follow-up work with two EU employer organisations to gather data on costs of QFT or traineeship implementation, on the basis of a costs collection table (see below).

A finding from all the national case studies undertaken is that **no data exist on costs or quantifiable benefits** associated with the QFT implementation. Each case study found no evidence or literature on QFT-related costs and benefits, and case study stakeholder interviews confirmed the lack of data. Neither was it possible to uncover such evidence from other strands of the research (mapping, consultations, survey and additional work undertaken as described above). Conceptually and practically, it is extremely difficult to reliably assess the potential benefits and costs associated with QFT implementation in Member States, for several reasons:

- Benefits/costs that actors (employers, trainees, authorities) are typically aware of are those of introducing and implementing traineeships per se, rather than any additional or different benefits/costs due to adapting traineeships to QFT principles. Many stakeholders reported that costs and benefits associated with the QFT overlap with those of traineeships in general and the QFT has not led to the emergence of new types of costs or benefits.
- As noted in other chapters, awareness of QFT among relevant actors is low. Thus, even where benefits/costs can be identified, actors are unlikely to attribute them appropriately to the QFT.
- Member States had traineeships in place prior to the QFT, often closely resembling what is called for in the QFT. Even where specific traineeship developments are in line with the QFT

Recommendation, most stakeholders noted that they have not monitored their effect. Hence it is not usually possible to identify which, if any, elements of these developments and their benefits/costs would occur anyway, and which can be attributed to the QFT.

- Moreover, even where the QFT has impacted the trainee landscape, and specific developments can be accurately attributed to the QFT, their often qualitative nature (e.g., improved clarity of contractual terms, educational objectives, rights and obligations) makes it very difficult for actors to quantify associated benefits/costs. The best that can be achieved in most cases is that they can name the benefits/costs and perhaps give some qualitative assessment of their importance.

Despite the challenges, we present below evidence from the stakeholder consultations, trainee survey and case-studies which, taken together, provide a picture of benefits and costs, largely qualitative in nature (where quantitative evidence was provided that is also presented). Where stakeholders stated that costs or benefits arose directly due to the QFT, this is stated in the text.

When considering benefits and costs, we use the typology from Tool 56 of The Better Regulation Toolbox. This is designed mainly for assessing the implementation of policy initiatives and enforceable legal regulations, meaning that many categories in the typology are of limited relevance in the context of a non-binding Recommendation, such as the QFT. It is, nevertheless, helpful to use the Toolbox categories in presenting the evidence on benefits and costs, distinguishing in particular between:

- Direct benefits and indirect benefits;
- Direct costs¹⁵⁶, enforcement costs and indirect costs

Benefits of the QFT

Evaluation question: What can be approximated in terms of quantifiable benefits for young people? Are there other quantifiable benefits for society at large that could be linked back to the QFT?

Stakeholder information and views collected in the research provide some evidence on the degree to which the QFT has benefited young people, employers or society whilst underlining the difficulty of quantifying these benefits. This is because measures similar to the QFT were already in existence, and the QFT therefore made little difference (e.g., [Sweden, Austria](#)); because the QFT has not been fully implemented (e.g., [Hungary](#)); or because the effect of the QFT has not been monitored (e.g., [Latvia](#)). However, in Member States where there were changes following QFT implementation, several benefits were noted, presented below by broad stakeholder type (as most of these apply to traineeships in general, we have highlighted only cases where stakeholders reported that the QFT specifically had enhanced these benefits to at least some degree).

Direct benefits

Looking first at [direct benefits for young people](#), the following emerged from the evidence:

¹⁵⁶ Note that we define the various categories of costs broadly in line with the typology suggested in the European Commission's *Better Regulation Toolbox* (adjusted to take account of the fact that the QFT is a non-binding Recommendation). In particular we distinguish between two key categories of direct cost: **Adjustment costs** (costs incurred by stakeholders in adjusting their activities to the principles of the QFT); and **Administrative costs** (costs incurred by stakeholders in administrative activities performed to comply with the recommendations of the QFT).

- **Growth in number of quality traineeships:** national stakeholders from **Romania**, for example, reported more and better quality traineeships due to the QFT putting traineeships on the political agenda and opening discussions on what makes a quality traineeship.
- **Reduced exploitation and greater awareness of rights:** national interviewees from **Estonia, Cyprus, Ireland, Luxembourg, Poland** and **Slovakia** noted that the QFT can be linked to reduced exploitation of trainees, as it highlighted in particular the importance of traineeships having a written contract/agreement. National consultees from **Malta** and **Luxembourg** stated that the obligation to have such contracts/agreements in place has helped trainees understand their rights. National stakeholders from **Croatia** noted that ALMP traineeships designed to meet the QFT have improved trainee rights, putting them on the same level as other employees. Similarly, EU level stakeholders noted that the QFT is often used as a reference point to understand what potential trainees should expect from a traineeship.
- **Enhanced skills and certification of skills:** The survey of trainees conducted for this study (covering those completing traineeships since the QFT's adoption in 2014) highlighted key traineeship benefits as the achievement of learning objectives and gaining skills, with 78% of respondents agreeing or strongly agreeing that their traineeship helped them achieve their learning and training objectives, and 82% agreeing or strongly agreeing that they gained practical experience and relevant skills. Similarly, a survey in **Poland** of ESF-funded ALMP traineeships found that over 91% of participants were satisfied or highly satisfied with the traineeships. The main recognised benefit was acquiring transversal skills, including teamwork, communication, ability to organise own workload, and analytical skills. Likewise, many stakeholders consulted in the research argued that QFT had contributed both to improved skill levels among trainees, and to better certification and documentation of skills. Thus, a representative of one EU level organisation noted that recognition of the need for the certification of skills and knowledge gained during a traineeship has grown following the QFT's introduction. **Irish** national stakeholders reported benefits for young people through improved skills, noting that the QFT helped highlight how their traineeship offer could be improved to align with best practice: specifically, a Career Traineeships pilot based on QFT principles was developed, and an evaluation¹⁵⁷ of the pilot found that trainees enhanced their knowledge, skills, and proficiency in real work settings. These findings were reinforced by the **Irish** case study evidence (see box below).

Example of benefits of traineeships

The **Irish** case-study reported key skills-related benefits from recent quality ALMP traineeships, with:

- enhanced knowledge, skills and competence learned and applied in real work settings;
- strong transversal skills like communication, entrepreneurship and digital capability now being built into traineeships rather than the previous narrower focus on technical skills development;
- effective supervision and mentoring in quality traineeships leading to enhanced career progression, with participants better prepared to make career choices; and
- greater engagement in training of disadvantaged youth who have been less well-served by traditional education.

- **Improved access and transition to labour market:** Partly due to improved skill levels, and more widespread certification of trainees' skills associated with the QFT (as noted above),

¹⁵⁷ ICF (2018) Developing Best Practice in Work-Based Learning - An Evaluation of the Career Traineeship Pilot Final Report 28 March 2018. Available at: <https://www.solas.ie/f/70398/x/8948babc28/developing-best-practice-in-work-based-learning-an-evaluation-of-the-career-traineeship-pilot.pdf>

there was some evidence that labour market entry had been improved or eased. 62% of respondents to the trainees' survey agreed that traineeships made transitioning from school to work easier, while 56% agreed that traineeships made the re-entry into the job market easier. Similarly, among stakeholders consulted, an EU level organisation argued that improved certification of skills due to the QFT allowed trainees to clearly prove to potential employers the skills gained while training. **Irish** evidence showed that the Career Traineeships pilot (mentioned above) aligned with the QFT, contributed to improved ability for trainees to move into work (98% of trainees moved into employment following the traineeship, of which 72% with employers that had originally hosted the trainees). Similarly, **Cyprus** national authorities noted that QFT implementation had a positive impact on the results of ALMP traineeships, with 77% of trainees in the personal care sector in 2017-2018 employed in that sector after their traineeships. The **Irish** case study (example below) identified extensive labour market benefits for participants in ALMP traineeships, although it was suggested that benefits may be less for some open market traineeships.

Example of benefits of traineeships

The **Irish** case-study highlighted that open market traineeships can be low quality and lack positive employment outcomes for disadvantaged groups, although graduate internships perform better in this respect. Greater levels of labour market benefits are reported from ALMP traineeships, including:

- strong employment outcomes from quality traineeships (60% securing work within 12 months);
- quality traineeships acting as steppingstones to apprenticeships or degree courses.

Turning to **direct benefits for employers**, evidence (again mainly qualitative) from stakeholders showed several sources of benefits (it was not always possible to identify how far these stemmed from adoption of QFT principles rather than from traineeships *per se*):

- **Improved understanding of the quality aspects of a traineeship:** Interviewees argued that the QFT helps employers understand what a quality traineeship should entail, including structured sector or organisation training and skills evaluation. As noted, for example, by national stakeholders from **Malta**, this increases the likelihood that trainees will have or acquire the specific skills required by the company, which is a clear benefit to the employer.
- **Reputational and recruitment benefits:** Some EU level stakeholders emphasised benefits to employers of offering traineeships that meet the QFT, through gaining a reputation for offering quality traineeships, which can increase the number and quality of young people applying to work for those employers.
- **Clarity and transparency of requirements:** A commonly cited benefit for employers of the QFT is that it provides a clear and transparent outline of the structure of a high quality traineeship for employers. Consultees from **Finland** and **Malta** thus noted that the QFT benefits employers through making traineeship requirements transparent; in particular the requirement to have a contract in place benefits employers as it makes clear their rights and obligations. Similarly, **Italian** employer representatives highlighted that the presence of a clear legal framework via the QFT allows employers to offer more traineeships.
- **Ability to invest in young workers at lower cost:** some interviewees noted, mainly for ALMP traineeships, that financial incentives reduce employers' costs of hiring and training young people (however, this applies equally, whether or not a traineeship meets QFT principles). It was highlighted in the case of ALMP traineeships in **Ireland**, for example, that quality traineeships can build a pipeline of employees, giving employers an opportunity assess the abilities of potential recruits without significant financial risk.

Some stakeholders in the research highlighted **direct benefits to society** arising from the QFT:

- In particular, several (at EU and Member State level) stressed the actual and potential wider impacts on **reduced youth unemployment** and **improved school-to-work transition**, by giving young people job-based skills and a chance to demonstrate their potential to

employers. Stakeholders from **Italy** noted that quality traineeships, in line with the QFT, are one of the most effective tools in the Italian labour market. Similarly, in the **Irish** case study it was reported that *“Benefits for society include increased employability as a result of the production of relevant skills tailored to employment needs”*. However, it should also be noted that other stakeholders stressed the difficulty of assessing social impact, due to the problem of isolating the specific effect of the QFT on traineeships, the corresponding effect on unemployment, and therefore the scale of benefits society might experience from reduced youth unemployment. No quantitative data was available for any of the Member States examined to confirm causal links between traineeships in general, QFT implementation in particular, and wider labour market benefits.

Indirect benefits

Indirect benefits from the QFT were rarely identified by stakeholders, and in cases where they were mentioned, they tended to be potential rather than actual benefits, and to concern indirect benefits **to society**. For example, it was noted by one EU-level stakeholder that reducing youth unemployment, including via traineeships based on the QFT, has the potential to reduce crime in Member States.

Occasionally, however, indirect benefits for other stakeholders were also identified. In the **Irish** case-study, for example, participating in ALMP traineeships was reported to give rise to wider indirect workforce benefits for **employers**, by enhancing the skills of existing staff as well as the trainees themselves, an example being the wider skills benefits associated with the training provided for workforce supervisors to support the trainees.

Costs of implementing the QFT

Evaluation question: What was the quantifiable administrative burden associated with the adequate implementation of the QFT for the different stakeholders at various levels (national, regional, local), in terms of e.g., transposition of QFT principles, enforcement/follow-up monitoring and other compliance checks?

As with benefits, stakeholder evidence indicates that costs associated with traineeships meeting QFT principles overlap with the costs of providing traineeships in general. Stakeholders struggled to separate costs arising from the QFT from those that would be incurred anyway, and the text below highlights the few cases where costs were specifically attributed to the QFT. While stakeholders could describe the type of costs incurred, few could provide quantifiable estimates, partly due to the nature of the costs and the lack of research and monitoring of QFT implementation. Furthermore, most stakeholders who had a perspective on costs took the view that costs attributable to implementing QFT principles would be small or insignificant.

Information on costs incurred is presented below by stakeholder type. It should be noted that evidence was provided on costs to employers and to national authorities, but no stakeholders identified specific costs to trainees/individuals (some stakeholders mentioned income foregone during training as a cost to trainees, but this is a cost associated with traineeships in general).

Direct costs

Looking first at **employers**, most EU level and national stakeholders consulted were unsure how significant any additional administrative, adjustment and other costs to employers have been. While the dominant view was that **QFT-related costs for employers were likely to be small**, some noted that they might be more significant for some small organisations with fewer resources to devote to understanding traineeship requirements and supervising trainees.

- **Adjustment costs for employers** in adapting to the requirements of QFT standards were noted by some respondents, linked to supervising trainees, assessing and certifying trainees'

skills at the start of a traineeship, and developing training plans to ensure learning objectives are met

- When asked about costs associated with QFT implementation, employers also cited **administrative costs** which were not strictly linked to any QFT principles, but which were nevertheless seen by the employers as an aspect of ‘quality traineeships’ and which they therefore linked to the QFT, for example direct labour costs of registering trainees for social security (additionally, in those countries where traineeships fall under general labour law, trainees must in any case be registered for social security). Similarly, some employers mentioned the costs of making agreements with PES/training centres; these are not a requirement of QFT principles *per se* but were nevertheless, for some employers, associated with steps towards improving the quality of traineeships, as developing training plans and written agreements with trainees often involved parallel discussions with PES or training providers. In cases where costs are subsidised or reimbursed, applying for and managing the subsidies itself involves administrative costs, especially for small companies.
- **Costs of external services** such as advertising traineeship opportunities and insurance costs against a work accident were highlighted by some stakeholders.

The research suggested that potential direct costs to employers of adopting QFT standards are likely to be higher for open market traineeships than ALMP traineeships. National authorities consulted noted that ALMP traineeships offer many more financial instruments and financial support for employers, limiting the costs they must bear. For example, PES representatives highlighted that employer can receive grants towards salaries for trainees, mentors and supervisors, as well as trainees’ personal protective equipment. A national trade union noted that ESF funding is also used by employers; but requires a great deal of administrative commitment in terms of reporting. **Spanish** employer representatives also mentioned that costs arose due to confusion about the rights and obligations of trainees and companies, meaning employers must spend time investigating these before offering a traineeship.

In the **Spanish** case study, an attempt was made to derive a proxy estimate of the cost to employers of participating in the ALMP traineeship programme. This was derived from the value of the state subsidy to employers for participating, on the assumption that this subsidy is sufficient to cover employers’ net costs of participation (example below). Whilst the QFT itself does not require some aspects required by the traineeship programme cited below, the example is still relevant as it provides an outline of a ‘quality traineeship’, broadly in line with QFT principles. The subsidy exceeds the cost of wages and social security contributions, so the difference can be taken as a rough proxy for the extra cost of offering a ‘quality’ (QFT-compliant) traineeship.

Example of subsidies to employers

The Spanish case-study gives the example of subsidies to employers for non-labour traineeships funded through the Youth Guarantee in November 2020, which were between €694.82 and €810.62 per month per trainee, equal to 1.2 to 1.4 times the IPREM¹⁵⁸ (the higher rate applying to disabled trainees). Subsidised employers must pay a wage equal to 80% of IPREM and social security contributions and justify the training content of traineeships. The implication is that the difference between the wage and the subsidy (i.e., 40-60% of the IPREM) covers the extra cost of providing the traineeship. However, as noted in the case-study it is unlikely that it covers all traineeship costs for employers (e.g., the allocation of additional time to explain tasks to the trainee, administrative tasks undertaken by HR or administration departments).

While it was generally difficult for employers and employer representative organisations to identify separately those direct costs which might be associated with a shift towards QFT principles, one business organisation did manage to obtain some estimates. The example below from a Belgian small and medium-sized enterprise (SME) participating in an ALMP traineeship programme,

¹⁵⁸ A reference standard for social benefits.

highlights the typical costs (in terms of staff hours) of implementing those aspects of the programme which were in line with QFT principles. These are summarised in the example box below. It should be stressed that this is not presented as a representative example, and is simply one case, but it does, nevertheless, provide some idea of the scale of costs which might be involved. Additionally, it should be noted that the business organisation highlighted that in addition to the direct costs indicated in the table, their SME members also incurred other ('hidden' or unmeasured) costs, such as the potential loss of productivity of the 'supervisor' who provides mentoring, and which should also be taken into account.

Example of direct costs incurred by employers (SME) associated with QFT principles in an ALMP traineeship programme

The example relates to an ALMP-traineeship in Flanders (Belgium): the IBO (*Individuele Beroepsopleiding* - "individual vocational training"). IBO provides-the-job training for unemployed job seekers for a period of 1-6 months and is based on an agreed training plan. VDAB (Public Employment Service) checks and gives permission to proceed with the IBO. VDAB also helps with the contract and other support/guidance (including providing information for recruitment as an employee after the traineeship). After the IBO has ended, the employer is obliged to offer a long-term contract to the trainee (in most cases). See: <https://werkgevers.vdab.be/ibo> for more information.

The employer pays a monthly fee to VDAB (varying between EUR 650 and EUR 1,400) calculated on the basis on the future (gross) wage that the trainee will receive when employed. The fixed monthly amount covers all costs, such as file costs and travel costs. Trainees keep their unemployment benefit and get an extra bonus (the higher their benefit, the lower the bonus), resulting in a gross income of at least EUR 1503.30. Additionally, transport and childcare costs are paid.

Traineeship phase	Action for the traineeship provider	QFT principle this relates to	Hours spent by traineeship provider staff member (total over 6month traineeship)	Explanatory comment
Recruitment	Drafting the vacancy notice with specific information on: <ul style="list-style-type: none"> whether an allowance and/or compensation are provided whether health and accident insurance are applicable; recruitment policies, including the share of trainees recruited in recent years by the company; 	14	1-2 hours	The company drafts the vacancy including all the information
On-boarding	Drafting the written agreement with specific information on: <ul style="list-style-type: none"> the working conditions whether an allowance or compensation is provided the rights and obligations of the parties under applicable EU and national law, the duration of the traineeship 	2 and 3	0.75 hours	If needed, the company receives support from the public employment service in Flanders (VDAB)
	Drafting the learning objectives of the trainee (e.g., meeting with the trainee to	3 and 4	4 hours	The company makes a training plan and guides the

	discuss and agree on their learning objectives/ drafting them/including them in the written agreement)			candidate on the basis of this plan. If the employer needs help with the plan, he/she can contact the mediator or use a template developed by the VDAB: how to draw up a training plan
During the traineeship	Providing a supervisor to the trainee that supports them through their traineeship (e.g., assigning one staff member to be the supervisor, meet on regular basis, manage the trainee)	5	Time an employer would dedicate to explaining his/her expectations to the supervisor: 4 hours <i>Is the supervisor getting any extra allowance/compensation?</i> The employer could have a discount on the social security contributions (when certain conditions are met), and in some cases the supervisor could have an extra compensation.	The employer asks and explains all expectations to a member of the staff that will be designed supervisor of the trainee
	Providing on-the-job training to the trainee during their traineeship so that they can fulfil learning objectives (e.g., trainee attending an online/in person training session)	4	6 Hours	From the point of view of the company it is key to consider the hidden costs behind mentoring, such as the loss of productivity related to the employee who provides mentoring
Offboarding (End of traineeship)	Assessing the skills acquired by the trainee at the end of the traineeship (e.g., through an exit interview/specific skills assessment etc.)	13	2 hours	
	Certifying the skills that the trainee has acquired during the traineeship through a certificate (e.g., drafting a certification/letter of reference for the trainee)	13	0.75 hours	

As far as **national authorities** are concerned, a range of costs of introducing traineeships in line with QFT principles were highlighted by interviewees. Stakeholders were unable to separate these costs from those of traineeships in general. Nevertheless, they made it clear that a shift to implementing the principles of the QFT would incur these types of costs, also highlighting that such costs would be small relative to other costs associated with traineeships:

- **Adjustment costs** for national authorities include direct labour costs associated with designing programmes, implementing new legislation.
- **Administrative costs** for national authorities include equipment and other costs linked to IT and other changes that need to be undertaken in order to meet reporting requirements before implementing an ALMP traineeship programme.

- **Grant/subsidy costs:** national authorities reported costs of public incentives to encourage uptake of traineeships aimed at both trainees and employers, including traineeship grants and reimbursing travel expenses for unemployed individuals. The Youth Employment Initiative and ESF were highlighted as such incentives, as were tax breaks to employers who offer traineeships. Again, such incentives are not specifically QFT-related, but it was noted that a shift to QFT principles might lead to greater uptake of incentives to offset extra costs incurred by stakeholders and that this would therefore add to the costs of national authorities.

Example of total PES costs for ALMP traineeship

One PES provided cost data which showed that, in 2021, approximately €150,000 was used to provide 200 traineeships, with around 90% of this coming from ESF and 10% from the national budget.

Example of costs of financial incentives for PES

One PES provided data on costs of financial incentives for ALMP traineeships:

- training providers were given €6 per hour per trainee in 2019 to fund the cost of tutorship, insurance, equipment and clothes/uniform.
- Companies providing young people with traineeships may also pay the Government reduced social security contributions of €5 per hour per trainee for online training, or €8 per hour per trainee for in person training for 25% of working hours during the first year of the traineeship and 15% during the rest of the contract.
- Additionally training providers can be paid €1.5 to €2 (depending on company size) for each tutorship hour up to a maximum of 40 hours per trainee per month.
- Employers with fewer than 250 workers are exempt from paying employers' social security contributions, and companies with more than 250 workers pay only 25%.

Enforcement costs

No evidence was found of significant enforcement costs associated with QFT implementation and stakeholders did not identify such costs in the interviews or case-studies. Enforcement of traineeship regulations would normally be undertaken by the national labour inspectorate or equivalent, and any costs would be incurred by the relevant national authorities. Such inspection, however, normally focuses on the enforcement of the relevant national legislation, and even where that legislation has been influenced to some extent by the QFT it is not possible to separately identify enforcement costs due to the QFT (see example below). Nevertheless, national authorities reported that introducing traineeships in line with QFT principles would be expected to incur enforcement costs due to investing in public services and labour inspectorates to monitor compliance.

Example of enforcement costs

The **Spanish** case-study notes that the Labour Inspectorate, belonging to the Ministry of Work, is responsible for enforcing that traineeships (and all forms of work) comply with current regulations. Therefore, it enforces that traineeships comply only with those QFT principles that are included in the Spanish Law. However, it should be stressed that the QFT is not considered by civil servants in their inspection tasks, as long as these are not stated in the Spanish Law (often, they would not know about the existence of the QFT).

Indirect costs

No evidence was found of significant indirect costs associated with the implementation of the QFT and stakeholders did not identify such costs in the interviews or case-studies.

Obstacles preventing employers from offering traineeships

Evaluation question: What are the main obstacles preventing employers from offering traineeships? What kind of support would be necessary to overcome these obstacles?

The interviews, case studies, and validation workshop identified several obstacles preventing employers from offering traineeships. These have been summarised in the table below, with further detail as well as possible ways to overcome each obstacle, provided in the section that follows.

Table 19. Obstacles preventing employers from offering traineeships

Type of obstacle	Obstacle	Type of traineeship most affected	
		ALMP	OMT
Regulatory	Complexity of existing legal frameworks		X
Administrative	Burden of setting up and managing cooperation with PES	X	
	Burden of applying for and managing financial incentives	X	X
Capacity	Lack of capacity to apply learning elements to the traineeship	X	X
Expertise and awareness	Lack of expertise on setting up quality traineeship schemes	X	X
	Lack of awareness of the benefits of traineeships	X	X

Source: Ecorys, 2022 based on all consultation tasks

The complexity of existing legal frameworks for open market traineeships: Employer representatives at national and EU level highlighted that a ‘blurry’ definition of traineeships and a complicated legal framework with different rules for different types of traineeships discourages them from offering traineeships, for fear of both the administrative burden of understanding the regulation, ensuring compliance with it, as well as any possible sanctions if the legal framework is (inadvertently) not complied with. This factor poses an obstacle for open market traineeships, and particularly in countries where open market traineeships are not covered by specific legislation but incorporated in different ways in general labour legislation. In **Greece**, for example, the fact that open market traineeships are concluded with fixed-term employment contracts due to the lack of a specific legal framework for traineeships places a burden on businesses, which discourages them from investing in traineeships. Research published by the European Parliament in 2022 confirms this finding, indicating that a lack of clarity in the legal framework surrounding traineeships as well as a general lack of regulation of open market traineeships hinders employers from offering quality traineeships.¹⁵⁹ Overcoming these obstacles could be achieved through **establishing clear national legislation on traineeships or simplifying existing traineeship legislation** as well as information campaigns led by national authorities and social partners to clarify legal frameworks.

Burden of setting up and managing cooperation with PES: It is clear from consultations with both national and EU level employer organisations in the case studies, interviews and expert meetings, that this is particular obstacle in the case of employers offering ALMP traineeships. This

¹⁵⁹ European Parliament, 2022, The Quality of Traineeships in the EU

[https://www.europarl.europa.eu/RegData/etudes/STUD/2022/699459/EPRS_STU\(2022\)699459_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/699459/EPRS_STU(2022)699459_EN.pdf)

is because of the need for cooperation arrangements to be set up with the PES in order for a company to take on an ALMP trainee.

Burden of applying for and managing subsidies and financial incentives to provide traineeships: Providing employers with funds for the initial design and set-up of traineeships or offering subsidies for the coverage of wage/social security contributions of the trainee were clearly identified as possible ways to overcome the obstacle related to the costs of traineeship provision. However, financial incentives can also require a large amount of administrative capacity to manage, thus acting as an additional deterrent in some cases to offering ALMP traineeships. In **Cyprus**, for example, interviewees highlighted that some companies resort to hiring an experienced human resources specialist to deal with the administration of taking on an ALMP trainee and with the requirements of receiving subsidies for this. Support to overcome this could include **providing appropriate information to employers from dedicated PES staff** to help them navigate administrative requirements of ALMP traineeships. EU employer organisations also suggested that national authorities provide guidance to enterprises and implement awareness-raising campaigns on the administrative obligations required to hire trainees.

Lack of capacity to apply learning elements to the traineeship: Providing supervisors, identifying and specifying learning objectives and certifying traineeships at the end of the experience were cited as obstacles by employer organisations consulted for the study, particularly where such aspects are legally required. This is especially so for small and medium-sized enterprises. Small and medium sized enterprises (SMEs) in **Bulgaria, Greece, Finland** and **Italy** reported that their limited capacity and resources affects their ability to ensure that traineeship opportunities are tailored to trainees' learning needs and to supervise and guide trainees.

Lack of expertise on setting up quality traineeship schemes: Employer representatives consulted during the study also highlighted that there is often an internal gap in knowledge and expertise on how to set up effective traineeship programmes, train supervisors and mentors for trainees and ensure that the traineeship is a quality experience. This was particularly reported as a challenge for ALMP traineeships and for SMEs. Support to overcome these obstacles could include providing **guidance on the requirements of traineeship programmes** and dissemination of good practices, including on the role of supervisors.

Lack of awareness of the benefits of traineeships: Particularly in view of the costs associated with offering traineeships, a lack of awareness of what the employer can also gain through offering a traineeship can be detrimental. There is room to improve the achievement of one of the objectives of the QFT, to increase awareness of the rights and obligations of traineeship providers. Information campaigns showcasing the clear benefits of traineeships as a long-term investment in the development of a company's human resources would help in this. Traineeship providers could also be encouraged to embed their quality traineeship programme into corporate social responsibility (CSR) policies. In the case of ALMP traineeships, such awareness raising campaigns should also be accompanied by cooperation between employers and PES to ensure traineeships programmes offered by the PES are in line with the needs of employers in the local economy. This was reported as a deterrent for employers in offering ALMP traineeships, for example, in **Poland**, where insufficient cooperation between employers and the PES and lack of adjustment of traineeship programmes to the needs of the local economy were cited as barriers.

Use of financial incentives to encourage the offer and quality of traineeships

Evaluation question: To what extent have Member States encouraged or enabled traineeship prevalence and improved quality through financial incentives? Have any EU programmes (such as the YEI and ESF) contributed directly or indirectly to financial incentives?

Financial incentives for employers to encourage the offer or quality of ALMP traineeships are **relatively widely used** according to the research conducted for this study. Table 20 below outlines the main objectives of the incentives and the Member States in which these incentives have been reported.

Table 20. Use of financial incentives in Member States

Type of incentive	Member State
To encourage or enable traineeships	BG, CY, DE, EL, ES, HR, IT, LU, LV, MT, SK, SI, EL, PL, RO
To improve traineeship quality	BG
To enable trainees to be hired following their traineeship	BG, SK, IE, ES

Source: Ecorys, 2022

Financial incentives appear to be most commonly used to encourage or enable ALMP traineeships. This is done through state subsidies and social security contribution reductions for companies providing traineeships. For example, in **Germany**, employers who take on young people for in-company introductory training receive a subsidy that covers trainees' pay and a lump sum towards the trainees' total social insurance contributions.

Financial incentives to encourage employers to hire trainees after the traineeship has been completed were also reported. In **Spain**, companies hiring young graduates are entitled to a 50% reduction in social security contributions (75% if the young person has previously completed an ALMP-related non-labour traineeship). Likewise, in **Slovakia**, financial incentives, funded by the ESF, are available to employers who hire young graduates for a set number of months. The **Bulgarian** initiative cited above also includes exemption from a number of social security contributions if the employer subsequently signs a permanent contract with the trainee.

The use of financial incentives aiming specifically at improving the quality of traineeships was less frequently reported. The only example of this found during the study is in **Bulgaria** where the New Opportunity for Youth Employment initiative offers employers incentives to hire young people up to the age of 29, subsidising the cost of both supervisor and covering transport costs and wages for trainees¹⁶⁰.

As outlined in section 3.2.4, the European Social Fund and the Youth Employment Initiative have been used in multiple Member States to provide financial incentives to employers. In **Cyprus**, the Employment Subsidy Programme for secondary and post-secondary graduates operates within the framework of the Youth Guarantee. It aims to provide unemployed young people with limited work experience and minimal tertiary education with a placement in order to improve their skills and give them work experience¹⁶¹.

Table 21. Examples of financial incentives to employers to support traineeships

Examples of financial incentives to employers to support traineeships
<p>Pathways to Work in Ireland: In Ireland, although there are no official financial incentives in place to support traineeships, the country's Pathways to Work 2021-2025 strategy includes a commitment from the Irish government to increase the availability of traineeships by offering employers subsidies when they recruit young unemployed people. However, so far there is reported to have been low take-up of this measure.</p>

¹⁶⁰ European Commission (2018): Traineeships under the Youth Guarantee. Experience from the ground.

<https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8163&furtherPubs=yes>

¹⁶¹ European Commission (2018): Traineeships under the Youth Guarantee. Experience from the ground. In Italy Quarterly Monitoring Reports (September 2017) prepared by ANPAL indicate that approximately 45% of young NEETs who started and concluded a traineeship measure under the YG are employed at the end of the reference quarter and 70.4% of employment relationships are of a stable nature (open-end and apprenticeships) <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8163&furtherPubs=yes>

Subsidies in **Spain**: The Spanish government provides subsidies for training providers per hour and per trainee in order to fund the cost of tuition, insurance, equipment and work clothes and equipment. Spanish companies hiring young people on a training or apprenticeship contract are also eligible for reductions in social security contributions

Proportionality of costs to assessed benefits

Evaluation question: To what extent are the administrative costs proportionate to the assessed benefits of QFT implementation? What has been the cost-effectiveness and how/why does it vary across the 27 Member States? What factors influenced the efficiency and how did they do so?

The evidence indicates that the **total costs associated with the QFT (including administrative costs) are generally proportionate to the benefits of implementation**. A key reason is that costs linked with the QFT are generally considered to be low whereas benefits, especially those expected to occur in the future, are potentially large. Throughout the interviews, case study research and expert meeting, stakeholders (employer, employer organisations, national authorities) highlighted benefits more often than costs, and while quantification was difficult, their inability to identify significant costs associated with the QFT in its current format suggests that such costs are unlikely to be large enough to outweigh the benefits that were more frequently identified.

Further evidence supporting proportionality comes from the **Italian** case study which discusses the impact of a mandatory monthly allowance for trainees. This allowance is not a requirement of the QFT and in fact stems from legislation which precedes the QFT; nevertheless, it gives insights into the proportionality of costs associated with quality traineeships and is therefore worth exploring. As noted in the case study, despite the significant increase in employer costs due to the introduction of the monthly allowance, the number of traineeships grew significantly. Whilst this is not a strict indicator for the benefits, it is corroborating evidence consistent with the conclusion that the benefits of quality traineeships within a fair legal framework outweigh the increased costs. The case study also notes that the extent of those benefits is likely to vary by sector, traineeship duration and other factors.

Various other examples of the proportionality of costs and benefits are given below.

Examples of proportionality of costs and benefits

Stakeholders from **Latvia** noted that the total costs of traineeships (including those that met the QFT principles) are in general covered by increased taxes after just one year.

Slovenian stakeholders stated that the traineeships generally have very low costs and often have positive employment outcomes; approximately 70% of trainees move into employment. This transition represents a far lower cost than if those individuals remained unemployed or inactive and in receipt of social support

Overall, the difficulties already discussed in assessing costs and benefits translated for most stakeholders into an equal difficulty in assessing how far QFT implementation is cost-effective. Nevertheless, the evidence does indicate that **stakeholders generally believe that the QFT is well thought-through and outlines a clear traineeship model to help move young people into work**. This, combined with overall low costs associated with the QFT, means that stakeholders who had a view considered that the QFT is likely to be cost-efficient.

However, several factors were seen to affect the proportionality of costs to benefits. Most importantly, efficiency is achieved only if the QFT succeeds in achieving higher quality traineeships. The concern here is that low quality traineeships would result in higher costs or reduced benefits, for example through:

- higher personal costs for young trainees, as they spend time training but are not given the skills or knowledge required to move into employment;
- lower benefits to employers, as the organisation misses out on the chance to provide the individual with company-specific skills

For these reasons, low quality traineeships also place greater burdens on the public purse, especially if the traineeships are state financed. Hence, several national stakeholders highlighted the importance of **monitoring and enforcement of traineeship quality** (currently seen as lacking) as part of the QFT, in order to ensure its cost-efficiency. Several examples (see below) emerged where cost-efficiency was seen to be impaired by inadequate traineeship quality.

Examples of cost-efficiency impaired by inadequate traineeship quality

- Consultees from **Finland** noted a general lack of comprehensive monitoring/quality assessment and less than adequate measures to intervene to ensure cost-efficiency.
- Stakeholders from **Belgium, Greece, Ireland, Spain, and Poland** also spoke of ineffective monitoring, allowing low quality traineeships to persist, including those that are unpaid or do not provide a formal contract.
- A similar point emerged in the trainee survey, with 20% responding that one of the principal ways to improve traineeships is by improving the compensation. Approximately 10% of survey respondents also spoke of exploitation, including traineeships being used as a form of cheap labour and being given tasks that others don't want to do. Against this, some stakeholders highlighted that a benefit of traineeships to employers is that they allow them to hire a young worker for a lower wage than they would otherwise be required to pay while investing in that individual by providing them with structured job/sector specific training
- Stakeholders from **Greece** directly linked a prevalence of low-quality traineeships to the fact that the QFT is not a legal framework, resulting in companies designing their own traineeship and setting their own conditions.
- National authorities from **Luxembourg** highlighted that the legislation governing traineeships does not provide sanctions for non-compliant employers (e.g., who do not pay minimum wage or provide clear training objectives) and this allows low quality traineeships to persist even if national authorities encourage training providers to adopt QFT principles.

Other factors identified as affecting cost-efficiency included:

- **Employer size:** stakeholders, particularly employer representatives, noted that QFT implementation is less efficient for small and micro-organisations than for large firms, as costs may be higher relative to benefits¹⁶². For example, **Finnish** and **Latvian** interviewees reported high densities of small companies, many lacking the capacity to offer ALMP or open market traineeships, due to the requirement for a supervisor and mentor, and that a traineeship must not replace a regular position. **Irish** stakeholders similarly noted small firms unable to allow key staff the time required to mentor trainees in ALMP traineeships, and **Polish** interviewees stressed greater traineeship costs for micro and small employers as they have less time, fewer employees and resources to support the traineeship. This issue was also highlighted in the **Bulgarian** case study: *“While bigger employers are likely to estimate benefits higher than costs: ‘you motivate young people for the profession, many of whom remain in Bulgaria and develop further in the sector, in the company’ (e.g., the example of the ELBG traineeship programme) the latter may not be the case for small and medium sized enterprises (SMEs) as they may lack a traineeship infrastructure (availability of mentors, established traineeship programmes, learning material, etc.).”*
- **Awareness:** this is another factor identified as impacting on efficiency, including young people's awareness of traineeship opportunities, employers' awareness of the potential benefits of offering a traineeship, of the funds available to support employers, and of what is specified in the QFT. For example, national authorities from **Estonia** attributed low take-up of the wage subsidy for ALMP traineeships partly to lack of stakeholder awareness of its

¹⁶² As noted in section 3.1, the trainee survey showed that most trainees were in small or medium enterprises rather than large ones. However, given the much greater prevalence of small and medium enterprises in European economies, and the fact that the survey was not controlled for company size, this is not surprising, and it could still be the case that larger firms are more likely to offer traineeships (as found by the 2013 Eurobarometer survey).

existence, while the mapping exercise highlighted that, in many countries, stakeholders (such as youth organisations in [Slovakia](#)) were not fully aware of the QFT.

- **Link to employment:** the degree to which QFT implementation led to traineeships facilitating sustainable employment was seen as a key factor affecting cost-efficiency. The link between the QFT and traineeships resulting in job offers is difficult to establish. While some national authorities (in [Cyprus](#), for example) believed that ALMP traineeships applying QFT principles help young people secure a job, other Member State stakeholders argued that additional incentives for employers to offer jobs following traineeships would be needed to increase efficiency. For example, a PES noted that employers see ALMP traineeships as a short-term state-financed measure and do not offer regular employment once the funding ends. Stakeholders from [Bulgaria](#) suggested that providing employers with good incentives, or penalties for traineeships not resulting in job offers, could increase the rate of follow-on employment and thus increase cost-efficiency. On the other hand, in the survey of trainees, respondents particularly linked guidance/support from a supervisor (76%), feedback from colleagues/team members (75%) and training/learning opportunities provided by the company (71%) as key in helping them get a job after the traineeship. This may indicate that **support from employers and training providers in the job search are as important as financial incentives to encourage employers to offer trainees jobs**. Whatever the best mechanism for doing it, the trainee survey confirmed there was scope for improvement in this respect: 42% were offered a job by the end of their traineeship; 79% said that the traineeship helped them get the job at least to some extent. Of those offered a job, 65% received an offer from the employer providing their traineeship, 27% from an employer they got in touch with during their traineeship, and 9% from an employer unrelated to their traineeship. Qualitative responses suggest that this was sometimes due to the provider not having the resources to hire the trainee, which trainees felt should have been mentioned when offering the traineeship.

Could benefits have been achieved at lower cost?

Evaluation question: Is there scope for reducing administrative burden without undermining the assessed benefits of QFT implementation? In other words, could benefits have been achieved at lower cost?

Evidence from the research suggests **it would be difficult to reduce administrative burden without also reducing the scale of the benefits**. This reflects the low additional total cost per trainee associated with QFT implementation. Furthermore, as the QFT is not a legal requirement, Member States are free to implement the principles they see as beneficial to their country. Thus, developments imposing excessive or unreasonable costs are unlikely to be seen.

Nevertheless, stakeholders from a few Member States noted that the amount of paperwork required from employers to comply with national legal frameworks could be reduced. One education and training board underlined the scope for reducing the paperwork around introductory meetings, information sessions, site visits, and health and safety, noting that frustrations with associated paperwork were a common complaint from employers. A trade union from [Cyprus](#) noted that traineeship legislation is associated with increased bureaucracy and completing of documents for ALMP traineeships, resulting in companies having to hire HR specialists to cover this work (and employers that cannot afford to hire someone simply do not offer traineeships). National consultees from [Ireland](#), [Latvian](#) PES, a [Lithuanian](#) employment organisation and [Romanian](#) PES also spoke of heavy paperwork requirements for ALMP traineeships, in particular during the assessment process at the end of traineeships, noting that this can dampen employers' enthusiasm for providing further traineeships. However, it must be noted that these administrative requirements are not imposed by the QFT Recommendation as such, so cannot necessarily be seen as costs incurred to implement the Recommendation.

Coherence

Key findings on coherence

There is overall a **fairly good level of coherence and complementarity between the objectives, target groups and measures to implement the QFT, and relevant policies** at national and regional level in the fields of education and training, employment, and social policy. However, the degree of coherence varies both across EU countries and by policy field. There is more evidence of coherence with national and regional measures within the context of ALMPs than with open market traineeships. Overall, the greatest degree of coherence can be found with national and regional policies in the field of employment, compared to the policy fields of education, training and social policy. Some challenges which could be addressed to improve coherence with relevant national and regional policies include improved horizontal policy coordination at national/regional level, widening the scope of the QFT, making the QFT more ambitious (i.e., strengthening the principles), and improving links with education and social policies.

The objectives, target groups and measures to implement the QFT, both in the context of ALMPs and open market traineeships, display **overall a good level of coherence with other relevant EU initiatives, funds and programmes**. No evidence of overlap or duplication was found. The QFT is coherent with relevant overarching EU strategies, EU youth policies, EU initiatives on traineeships and apprenticeships, and EU employment policies. It is also coherent with key EU funding mechanisms including the Youth Employment Initiative (YEI), the ESF+, NextGenerationEU and Erasmus+. Our research has nonetheless highlighted ways in which coherence with relevant EU initiatives could be improved, including: increasing the visibility of the QFT, including via awareness-raising and mutual learning; providing more practical guidance about how to implement the QFT principles; considering whether QFT compliance could be a conditionality for funding (e.g. ESF+); using the QFT as a framework for monitoring and evaluation of traineeships; promoting more links and common messaging with the EFQEA; and developing more synergies with quality measures for traineeships under other EU programmes such as Erasmus+.

Coherence with national and regional policies

Evaluation question: To what extent have the objectives, target groups and measures to implement the QFT within the context of ALMPs been coherent with education and training, employment and social policies at national and regional level? How about open market traineeships?

The research indicates that there is overall a **fairly good level of coherence with national and regional policies in the fields of education and training, employment, and social policy**. However, there is also some variation across Member States and areas in which coherence is more limited or lacking.

We first present the evidence of **good levels of coherence**. On this front, it is important to note that a strong majority of national and regional stakeholder consultees (from youth organisations, national and regional policymakers, research institutes, employers' organisations, trade unions, chambers of commerce and industry) expressed the opinion that the measures to implement the QFT are in global coherence with national and regional policies in relevant policy fields. This overall coherence was considered to be largely due to the shared policy goal of providing young people with relevant, high-quality work experience and appropriate skills within a safe environment in which their rights are protected.

A good degree of coherence with national and regional policy was particularly underlined by a broad range of stakeholders (from youth organisations, national and regional policymakers, research institutes, employers' organisations, trade unions, chambers of commerce and industry)

consulted (in AT, BG, FI, FR, DE, EL, IE, LT, LU, MT, RO, SK, ES). Experts and stakeholders who participated in the expert and validation meetings held for the study also considered that there was good overall coherence with relevant national and regional policies. Examples of strong overall coherence include the following:

- In **France**, social partners and national policymakers noted that there is very good coherence with national and regional policies and that the QFT is consistent with the approach and guiding principles in France.
- In **Austria**, the interviewed social partner representatives explicitly indicated that the overall ambition and purpose of the QFT are considered to be coherent with social, educational, employment and training policies; other Austrian interviewees (principally national policymakers) also considered that there was a certain level of coherence. Social partners considered that the aim is to ensure that work experience is well embedded into education and training pathways.
- In **Lithuania**, all the experts interviewed agreed that implementation of the QFT is very coherent with national and regional education, training, employment and social policies. The relevant measures comprise part of the overall national policy aimed at providing youth with appropriate practical experience and skills.
- In **Italy**, and although timings of implementation do not coincide, there is strong consistency between the QFT Recommendation and the Italian legal framework on traineeships, as they share the same final goal and almost all principles to pursue it.
- In **Ireland**, there have been considerable efforts made to reconfigure further education and training (FET) in Ireland in recent years¹⁶³. Stakeholders in the field of education and training underlined that measures to implement the QFT have filled a policy gap, by providing the impetus for quality training for medium-skilled jobs (as opposed for example to the higher education requirements for certain high-skilled occupations), as well as opportunities for young people who are inactive and need help to get a first foothold within the labour market. New models of ALMP traineeship and work-based learning programmes have been developed or refreshed in Ireland since the QFT Recommendation to align existing models with best practice in traineeships, as outlined by the European Commission's QFT. The box below presents an example of the way in which ALMP traineeships now align with the QFT.

Ireland: Coherence of new ALMP programmes with the QFT

In **Ireland**, the new ALMP programmes align with many of the QFT recommendations in that they typically include: some form of agreement [albeit not standardised across traineeship programmes]; workplace supervisors/mentors; specified learning and training objectives; clear working conditions; clear rights and obligations; and validation of knowledge, skills, and competences. The newest ALMP programme in Ireland – the WPEP (Work Placement Experience Programme), introduced in July 2021 – demonstrates the greatest level of alignment with the QFT principles in its operating guidelines, with a strong degree of coherence between the QFT and the key features of the programme. These features include: the duration of the traineeship (6 months); an expectation to complete at least 60 hours of training while on the placement, of which 20 hours should be accredited or sector-recognised training; host employers are required to complete a monthly compliance checklist to check that progress is in line with programme guidelines; an assigned mentor has to meet with the trainee on a weekly basis to provide feedback and support a personal learning plan; monitoring is carried out via an assigned Case Officer who liaises with the host and the participant during the placement to ensure that the terms and conditions are being fulfilled (by the end of June 2022, 118 monitoring reviews had been completed); and it is specified that extensions to placements are not permitted (to avoid trainees being used to replace regular employment).

¹⁶³ Department of Further and Higher Education, Research, Innovation and Science (2021) Ireland's National Skills Strategy 2025 – Ireland's Future', 10 June 2021

Our study also however highlighted **some limitations or a more mixed picture in terms of coherence with national and regional policies**. In **Croatia** for example, while national policymakers considered that there was a good degree of coherence, trade unions and youth organisations underlined that the principles had not always been applied in certain national measures (e.g., SOR (*Stručno osposobljavanje za rad bez zasnivanja radnog odnosa* – a work placement measure for young people), although this measure is now abolished). Employers' organisations and trade unions which were consulted in the **Czech Republic** considered that there was limited coherence with QFT principles in national and regional policies as while the principles are largely enshrined in legislation, they are not implemented in policy on the ground. One Czech trade union considered that this gap in implementation was also because work-based learning for young people and adults is still poorly developed in the Czech Republic compared to most other Member States, and because opportunities for traineeships have further diminished due to the Covid-19 pandemic meaning that employers do not have to provide so many rights to attract trainees. In **Poland** too, university experts, trade unions and employers highlighted that coherence with the QFT was not always clear in national and regional policy, but also that national and regional policy in the field of traineeships and employment is not always coherent in itself. The majority of national and regional stakeholders consulted – including policymakers, social partners, youth organisations and chambers - felt that there was better coherence and complementarity between policies at EU level than at national and regional level. In **Greece** for example (see box below), while national stakeholders (from relevant ministries, employers' organisations and trade unions) underlined the coherence of the QFT with national and regional education, training, employment and social policies, they noted that implementation does not always follow from policy alignment and that the QFT principles are not uniformly applied. In **Bulgaria**, coherence with the QFT with national and regional policies is partial. Although most QFT principles have been translated into national legislation regarding both OMT and ALMP traineeships, non-coherence and/or partial coherence has been found in relation to some, as set out in the box below.

Greece: good coherence in policies, but limitations in terms of implementation on the ground

The case study on Greece confirms that the implementation of the QFT is coherent with national education, training, employment, and social policies, but also that there is no uniform implementation across different traineeships due to the existence of different systems of vocational education and training with different quality criteria and approaches. The quality of each VET system is ensured by different organisations and with different terms. For instance, the quality of apprenticeships is ensured by the Institutes of Vocational Training, the quality of traineeships within continuing vocational programmes is the responsibility of Lifelong Learning Centres and the quality of traineeships for students is under the supervision of the Colleges and Higher Education Institutes.

Bulgaria: Partial or non-coherence of national/regional policies with QFT principles

The case study on Bulgaria highlighted that, although many of the QFT principles have been integrated into national and regional policies, there is only partial coherence, or no coherence for some principles with these policies. These include:

- **Duration:** according to the Labour Code, the duration of the traineeship employment contract cannot be less than six months and not more than twelve months [Art. 233b (3)]. In relation to ALMPs, employers can receive subsidies for trainees for up to nine months (Art. 41, Employment Promotion Act, EPA) which determines, more or less, the duration of traineeships.
- **Recognition through an assessment and a certificate:** within 14 days after completion of the traineeship, the employer shall issue a document to the trainee which can be used when applying for a job with another employer (LC, Art 233c). However, the national legislation does not provide clear rules about the content of the document, for instance, how it shall acknowledge knowledge, skills and competences acquired during the traineeship.
- **Traineeship vacancies include information on traineeship conditions:** this is not regulated in legislation in relation to both OMT and ALMP traineeships.
- **Challenges for small and medium sized enterprises (SMEs):** it has been noted that some of the QFT principles are challenging for Bulgarian SMEs to implement due to the lack of financial and human resources

and available traineeship infrastructure as compared to bigger companies. Financial incentives provided by the State are not sufficient to support quality traineeships in SMEs.

Similarly, in **Lithuania**, despite an overall good level of coherence, there are clear areas in which national and regional policy does not align fully with all the QFT principles. Some examples are set out in the box below.

Lithuania: Dimensions of national and regional policy which are not coherent with QFT principles

The Lithuanian case study shows that, while the majority of QFT principles have been implemented, national and regional measures on traineeships do not yet fully cover certain QFT principles. These include the following principles in relation to national and regional policies and measures regarding **ALMP traineeships**:

- Lack of vacancy notices and advertisements information;
- Lack of application in relation to cross-border traineeships;
- Traineeship agreements do not clearly define whether coverage in terms of health and accident insurance as well as sick leave is provided;
- The implementation of the principle of clarifying the circumstances and conditions under which a traineeship may be extended or renewed after the initial traineeship agreement expired is not clear. According to national law, traineeships longer than 6 months are not allowed; however, if the traineeship agreement was signed for shorter period of time, it can simply be renewed.

There are similar gaps in terms of national policies in relation to **OMTs**, for example:

- There is no strict obligation to indicate educational objectives or tasks allowing trainees to work towards their learning and training objectives in the bipartite agreement;
- There is no legislation indicating trainees' rights and working conditions under applicable law are respected including - limits to maximum weekly working time, weekly rest periods, minimum holiday entitlements;
- According to national legislation, voluntary work is unpaid, therefore the written agreement does not mention either whether the trainee is entitled to an allowance or compensation, or the amount.

Our study has also highlighted some of the **factors which contribute to good and/or more limited coherence**. Some factors which **explain good coherence** include the following:

- **Implementation of the QFT principles prior to the adoption of the QFT:** in some Member States (e.g., AT, DE, LU), stakeholders considered that there is good coherence between national and regional policies and the QFT since the principles were already largely implemented prior to the adoption of the QFT. Some business representatives in **Austria** even felt that there can be 'over-compliance' with the principles in their country, suggesting that some national and regional policies go above and beyond the QFT principles and hinting at a form of gold-plating¹⁶⁴. It should be noted however that Austrian social partners consulted considered that trainees should get further protection and rights.
- **Introduction of new policies to increase alignment:** in other Member States (e.g., BG, ES, FI, IE), stakeholders (including youth representatives, PES and national policymakers) considered that the introduction of new policies had led to improved coherence with the QFT. For example, it was underlined by representatives from both the PES and a youth

¹⁶⁴ Gold-plating can be defined as "an excess of norms, guidelines and procedures accumulated at national, regional and local levels, which interfere with the expected policy goals to be achieved by such regulation" (Matteo Bocci; Jan Maarten De Vet; Andreas Pauer (February 2014). 'Gold-plating' in the EAFRD: To what extent do national rules unnecessarily add to complexity and, as a result, increase the risk of errors? (PDF) (IP/D/AL/FWC/209-056 ed.). Brussels: Directorate-General for Internal Policies of the Union

organisation that the new labour market reform in **Spain** had increased coherence with the QFT. Similarly, youth representatives in **Finland** stated that new educational reforms have increased alignment with the QFT. National policymakers in **Bulgaria** highlighted that the QFT drove legislative changes in relation to open market traineeships. In **Ireland**, authorities responsible for education and training confirmed that the Action Plan for Apprenticeships and Traineeships 2016-2020 and the Five Step Guide to Traineeships produced by SOLAS were aligned with the QFT.

- **The leverage of national and EU funding for traineeships:** finally, in some Member States (e.g., MT, RO, SK), national and EU funding has been a driver for promoting coherence with the QFT. National policymakers in **Romania** and **Slovakia** particularly underlined the role of the Youth Guarantee in ensuring the QFT principles were implemented. In **Malta**, youth organisations highlighted the role of national and EU funds (particularly the ESF) in promoting synergies and coherence with the QFT, in particular by bringing national and regional policymakers from relevant fields (education and training, employment, social) together.

Our study however also identified some factors which **hamper or limit coherence** with national and regional policies. These include:

- **A lack of horizontal coordination mechanisms:** in some Member States, the lack of coordination between policies and policymakers across relevant fields can hamper coherence with the QFT. This was highlighted for example by a range of stakeholders (policy experts, national policymakers, social partners) in **Czechia**, **Latvia** and **Poland**. Due to limited coordination across policy fields, certain target groups (e.g., young people with high or low levels of qualification, inactive and unemployed people) fall under the responsibility of several ministries, with limited coordination and limited overall coherence with the QFT principles. For example, ALMPs are often in the remit of the Ministry responsible for employment which may not be joined up with the ministry for education. In addition, there can be a lack of continuity and strategic, long-term policymaking where policies are strongly linked to the government in power and can be subject to rapid change in case of a change in government.
- **The relatively narrow scope of the QFT:** a wide range of national and regional stakeholders (including policymakers, business representatives, education and training organisations and social partners) consider that the scope of the QFT is too narrow to interest stakeholders across different policy fields, hence hampering coherence with national and regional policy. The fact that the QFT does not apply to compulsory traineeships which form part of education or training programmes, and which represent the vast majority of traineeships within many countries, limits its coherence with many programmes and policy areas in certain Member States. If the scope were wider, the QFT would be taken into consideration by a wider group of national and regional policymakers and could increase coherence with a wider range of policies. This was for example particularly highlighted by most of the consultees in **Austria** and **Germany** and expressed by several participants (from all stakeholder groups) in the expert meeting held as part of the consultations for this evaluation.
- **Non-harmonised governance of different systems of vocational education and training:** As shown in the Greek case study (see box above), the existence of different systems of vocational education and training with different quality criteria, quality monitoring procedures and approaches can mean that implementation of the different QFT principles is patchy and not uniformly in alignment.
- **Lack of ambition of the QFT:** certain stakeholders (in particular employee representatives and youth organisation representatives at both EU and national level) consider that the QFT lacks sufficient ambition in terms of rights for trainees and compared to other EU policies (e.g., European Pillar of Social Rights) or national and regional policies, which can limit the degree of coherence with national and regional policies which potentially go further. This view was repeatedly expressed by stakeholders, in particular representatives of trade unions and youth organisations, at the expert meeting.

Finally, our study highlighted that there was generally a **greater degree of coherence with national and regional policy for ALMP traineeships than for open market traineeships**. ALMP traineeships are by nature designed within the context of national employment integration measures and tend to be well aligned with them. Open market traineeships may also be encouraged under a variety of schemes, but are also often at the initiative of employers, which means that they are not as closely aligned with national and regional policy. As seen above, there is also a much greater diversity of regulatory approaches of the conditions governing open market traineeships across the EU.

Evidence from our analysis of the implementation of the QFT in national legislation/frameworks concerning open market traineeships (see Section 3.2 above) suggests that there is generally greater coherence between the QFT and open market traineeships in countries or sectors where they are more highly regulated in law or in collective agreements. All the seven Member States identified in our legal analysis as having ‘fully implemented’ the QFT principles (BE, BG, ES, LT, LU, RO, SI) have implemented specific legislative measures in the labour code or dedicated instruments which relate to the QFT principles. Despite a more diverse picture, open market traineeships are nonetheless in general coherent with national and regional policies to facilitate youth employment and support the skills needs of employers across the EU.

Supporting and complementing other policies

Evaluation question: Linked to the former, to what extent does the QFT support and usefully complement other policies (in particular those pursued at national level)? What is the level of complementarity or duplication?

The research carried out for the study indicates that the **QFT has generally supported and usefully complemented other policies at national and regional level**, particularly in the field of employment policy. However, the degree of complementarity shows some variation across the EU and according to the different policy fields. The QFT has helped overall to encourage the implementation of measures which complement the theoretical knowledge gained through formal education and training curricula. In this section, we set out the evidence on complementarity with national policies in the field of: (1) employment, (2) education and training and (3) social policy, followed by a discussion on the complementarity with (4) apprenticeships.

Overall, the greatest degree of complementarity was found, within the context of both ALMPs and open market traineeships, between the objectives, target groups and measures to implement the QFT and **employment policy** at national and regional level. This was the case across Member States, including those (see above for examples) in which there was less horizontal coordination across national policies. The measures to implement the QFT were complementary to (and coherent with) key national and regional policies: examples include the Action Plan for Apprenticeships and Traineeships 2016-2020 in Ireland, the Employment and Training Services Act in Malta, or the Employment Relationships Act (*Zakon o delovnih razmerjih*), No. 21/13 (ERA-1) (for open market traineeships) and the Labour Market Regulation Act (*Zakon o urejanju trga dela*) (LMRA, No. 80/10) (for traineeships in the context of ALMPs) in Slovenia. In Spain, recent labour market reforms have further enacted principles of the QFT (e.g., sanctions for fraudulent or abusive use of labour training and traineeship contracts).

Complementarity with national and regional employment policies was also **facilitated via EU funds**, for example the Operational Programme for the Development of Human Workforce - Education and Lifelong Learning 2014-2020 in Greece, or other EU initiatives implemented at national level, particularly the national and regional provisions for implementing the Youth Guarantee. In France, the measures implementing the QFT (within ALMPs only) are complementary to a range of national and regional employment integration measures including the Youth Commitment Contract (*Contrat engagement jeune*) which replaces the ‘Youth Guarantee’ since 1 March 2022, the PMSMP (*Période de Mise en Situation en Milieu Professionnel* - Period of immersion in an occupational environment), the POEI (*Préparation opérationnelle à l’emploi* -

Operational preparation for employment) and the AFPR (*Action de formation préalable au recrutement* - Training action prior to recruiting).

Complementarity with employment policy was achieved in some countries by the existence of **mechanisms ensuring that traineeships are registered with the national PES**: in Malta for example all ALMP traineeships must be registered with Jobsplus (the public institution for employment and training services), and no organisation can enrol a trainee without a written permit from Jobsplus. Inputs provided in several of the consultations (expert meeting, interviews with a range of types of stakeholders) highlighted that complementarity with national employment measures was often better where trainees were considered as being employees (with employment contracts).

Key challenges raised in relation to complementarity with employment policy related in general to implementation. For example, even though policies may be complementary on paper in certain countries, there may be a weak link between measures and the labour market itself meaning that young people have difficulties in finding work after a traineeship (e.g., IT) or measures are not fully implemented in practice (e.g., EL). Complementarity with apprenticeship systems is a complex issue which is discussed further below.

Less - or more mixed - complementarity was found between the objectives, target groups and measures to implement the QFT and education and training policy. In terms of institutional responsibilities, the measures implementing the QFT are often under the remit of the ministry for employment, rather than the ministry for education, particularly since the QFT excludes traineeships which are a mandatory part of formal education or training programmes. This does not facilitate complementarity with national and regional education and training policies. Complementarity of measures to implement the QFT with national and regional education and training policy is weaker in countries where the education system and the labour market are in separate silos, and practical work experience or the needs of the labour market are not sufficiently taken into account. Our research also found that some young people can find it difficult to understand the difference between traineeships that are part of formal education or training programmes, and those which are on the open market or in the context of ALMPs.

There have however been clear efforts in certain Member States to ensure coherence with education and training policy. In **Finland**, there have been recent reforms in education and training policy which now ensure better complementarity with the QFT principles. One recent example, highlighted by a Finnish Youth Organisation, is from the spring of 2021 when the Government announced a special assignment – *Välittäjä Oy*¹⁶⁵ - which recruits people with partial work ability for longer-term employment relationships; even if these are not necessarily traineeships, the youth organisation considered that the policy illustrated the complementarity of national training policy with QFT principles of addressing exclusion and ensuring quality offers for all.

In **Slovenia**, interviewees from national employment authorities noted there is increasing recognition at national and regional level that practical work experience usefully complements the theoretical knowledge learnt in formal education and training programmes. Some stakeholders, including employment authorities in **Italy** and some participants in the expert meeting, indicated that (short-term) traineeships which are a compulsory part of education or training curricula can sometimes lead to more long-term open market traineeships; it was however clearly noted by consultees (from all stakeholder groups) that this type of measure should not lead to young people taking part in multiple back-to-back traineeships without securing employment.

Romania: measures to facilitate coherence with national and regional education and training policy

¹⁶⁵ <https://hpl.fi/uutiset/valtion-uusi-valittaja-oy-tyollistaa-jatkossa-vaikeasti-tyollistuvia-osatyokykyisia/>

In Romania, the principles that govern the internships within initial and continuing VET have been aligned with the QFT principles. In addition, the Ministry for education cooperates with the Ministry for labour and with national and local PES in a common project for tracking graduates to ensure complementarity. Furthermore, both regional and national consultation structures have been established (since 2003) to better articulate the training offer with labour market needs.

Finally, although there was generally good complementarity with **social policy** at national and regional level, **some gaps and incoherencies were noted**. For example, research and academic organisations in Poland highlighted that current social and family policy promotes the role of women within the family, rather than in labour market, which is not complementary to (or coherent with) the measures implementing the QFT which aim to facilitate the labour market transition of both young men and young women. In some countries (e.g., AT), it was noted that social protection for trainees is only available in traineeships which are considered as an employment relationship. As for the other policies, complementarity is less strong where horizontal coordination across policy areas is weaker.

The **complementarity between apprenticeships and traineeships is not clear in some Member States**. In some cases, as highlighted by stakeholders including employer representatives, trade unions and national policymakers, there is good complementarity: a traineeship can be a first step to engaging in a more structured apprenticeship which can lead directly to a qualification and to employment (e.g., LU, FR). However, some stakeholders in other Member States found that apprenticeships and traineeships can sometimes be in competition with each other. For example, employment experts and authorities in Italy stated that traineeships have too often supplanted apprenticeships, meaning that young people who would otherwise have carried out an apprenticeship have taken up a traineeship. In their view, this is not necessarily in the interest of the young person since traineeships often have lesser employment rights and conditions, and have less chance of leading to sustainable employment, than the more structured context offered by apprenticeships.

Finally, it is interesting to note that some countries have taken **active measures to avoid any risk of duplication of policies**: for example, in **Latvia**, there are no workplace traineeships under the Youth Guarantee to rule out any potential risks of overlap.

Coherence with relevant EU initiatives

Evaluation question: To what extent have the objectives, target groups and measures to implement the QFT within the context of ALMPs been coherent with the relevant EU initiatives¹⁶⁶ listed in section 2.4? How about open market traineeships?

The objectives, target groups and measures to implement the QFT, both in the context of ALMPs and open market traineeships, display **overall a good level of coherence with other relevant EU initiatives, funds and programmes, although there is variation across the different policies**. No evidence of overlap or duplication was found. We set out below an exploration of the coherence of the QFT with key relevant policies including: (1) at an overarching strategic level the European Pillar of Social Rights, EU policy in relation to (2) youth, (3) employment, (4) traineeships, and

¹⁶⁶ The relevant EU initiatives listed in section 2.4 of the tender specifications are: NextGenerationEU, the 2021 European Pillar of Rights Action Plan, the 2021 Commission Recommendation on Effective Active Support to Employment (EASE), the reinforced Youth Guarantee, the 2020 Commission Communication "Youth Employment Support: a Bridge to Jobs for the Next Generation", the Council Recommendation of 8 November 2019 on access to social protection for workers and the self-employed, the Directive of the European Parliament and of the Council of 20 June 2019 on transparent and predictable working conditions in the European Union, the Council Recommendation of 15 March 2018 on a European Framework for Quality and Effective Apprenticeships (EFQEA), the Youth Employment Initiative (YEI), the European Social Fund (ESF), the EURES portal, the European Solidarity Corps, Erasmus+, the EU Youth Strategy, the expected European Parliament own-initiative report on traineeships on the basis of Article 225 TFEU and the Digital Opportunity Traineeship initiative.

apprenticeships, as well as (5) relevant EU funds. We also set out (6) some potential ways in which coherence with EU policies could be improved which have emerged from the study.

Firstly, at an **overarching strategic level**, the QFT is in coherence with the fourth principle of the European Pillar of Social Rights (EPSR)¹⁶⁷, which establishes the right of young people ‘to continued education, apprenticeship, traineeship or a job offer of good standing within 4 months of becoming unemployed or leaving education’. The 2021 European Pillar of Social Rights Action Plan¹⁶⁸, endorsed at the Porto Social Summit of 7 May 2021¹⁶⁹, reiterates its call to Member States to dedicate at least EUR 22 billion to youth employment support, and underlines that traineeships (or internships) allow gaining practical and first-hand experience of work and that they usefully facilitate young people’s access to the labour market, but that ‘this aim can only be achieved if traineeships are of good quality and apply fair working conditions’. As underlined by some participants in the expert meeting conducted as part of the consultations for this study, the EPSR does however in some ways go further than the QFT in terms of rights, notably if a traineeship is considered as an employment relationship. For example, the 5th principle of the EPSR establishes the right of workers to ‘fair and equal treatment regarding [...] social protection’ whereas the QFT only encourages ‘traineeship providers to clarify whether they provide coverage in terms of health and accident insurance as well as sick leave’ (§7). Similarly, while the 6th principle of the EPSR establishes the right to fair wages and ensuring adequate minimum wages, the QFT only requires that ‘the traineeship agreement clarifies whether an allowance or compensation is applicable, and if applicable, its amount’.

Secondly, the QFT is also coherent, to differing degrees, with a range of EU policies in the field of **youth policy**:

- At a high strategic level, the EU Youth Strategy (2019-27)¹⁷⁰ addresses youth policy priorities and aims to ensure that all young people have the necessary resources to take part in society. This is coherent with the QFT, however there is limited direct policy links since the focus of the Strategy is on youth cooperation, social and civic engagement rather than employment and training, so coherence is limited to the general focus on support for youth. The accompanying 2018 resolution¹⁷¹ does however list in its annexes the European Youth Goals, which were the outcome of the 6th cycle of the Structured Dialogue. Although not legally binding for Member States and not integrated into the EU Youth Strategy, they include goal #7 on quality employment for all and goal #8 on quality learning.
- The Commission Communication on Youth Employment Support: a Bridge to Jobs for the Next Generation¹⁷² is in close coherence with the QFT since it underlines the importance of investing in youth employment, announcing major new EU financing opportunities and emphasises the need to future-proof the EU’s vocational education and training policy to smooth the transition from the world of education to the world of work. It also emphasises fair working conditions and improving access to social protection for all.
- The Council Recommendation¹⁷³ and accompanying Staff Working Document¹⁷⁴ on the Reinforced Youth Guarantee are also in very close alignment with the QFT. The Recommendation mentions the QFT in its preamble (§6) and specifically recommends (paragraph 19) that ‘traineeship offers adhere to the minimum standards laid out in the Quality Framework for Traineeships’.

¹⁶⁷ <https://ec.europa.eu/social/main.jsp?catId=1226&langId=en>

¹⁶⁸ <https://op.europa.eu/webpub/empl/european-pillar-of-social-rights/en/>

¹⁶⁹ <https://www.2021portugal.eu/en/porto-social-summit/porto-social-commitment>

¹⁷⁰ https://europa.eu/youth/strategy_en

¹⁷¹ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C:2018:456:FULL&from=EN>

¹⁷² <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020DC0276&from=EN>

¹⁷³ [https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020H1104\(01\)&from=EN](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32020H1104(01)&from=EN)

¹⁷⁴ <https://ec.europa.eu/social/main.jsp?catId=1079&langId=en>

- The European Solidarity Corps¹⁷⁵ provides opportunities for young people across the EU to develop experience through volunteering and solidarity activities. Although the traineeship and job strands are no longer running in the 2021-2027 period, the ESC is in coherence to the QFT through its focus on youth and providing opportunities to develop and grow through new experiences.

Thirdly, EU policies in the field of **employment** show good levels of coherence with the QFT. These include:

- The 2021 Commission Recommendation on Effective Active Support to Employment (EASE)¹⁷⁶, which moves from supporting employment during the crisis to creating future-proof employment, is in close coherence with the QFT. It specifically references the QFT both in its preamble (§13) and in paragraph 7, where it states that Member States “should introduce or strengthen support schemes for [...] paid traineeships [...]” which “should include a strong training component and be subject to monitoring and evaluation, offering a path to stable labour market integration”, and emphasises that support “should be linked to the relevant frameworks fostering job quality, such as [...] the Quality Framework for Traineeships”.
- The Council Recommendation of 8 November 2019 on access to social protection for workers and the self-employed¹⁷⁷ is also coherent with the QFT by promoting access to social protection for trainees. Its preamble (§11) specifically mentions traineeships as one of a variety of employment relations which exist across the EU alongside full-time open-ended employment contracts. The preamble (§18) notes that certain categories of worker, including those on traineeships, are excluded from social protection schemes. The Recommendation covers a variety of social protection measures (listed in paragraph 3.2), including sickness and healthcare benefits. While in coherence with QFT, it therefore also goes further, which only “encourages traineeship providers to clarify whether they provide coverage in terms of health and accident insurance as well as sick leave” (principle #7).
- The Directive of 20 June 2019 on transparent and predictable working conditions in the European Union¹⁷⁸ establishes that trainees could fall within the scope of the Directive if they meet the criteria established the Court of Justice for determining the status of a worker (preamble §8), further clarifying what constitutes an employment relationship. The interpretation of the Court of Justice of those criteria should be taken into account in the implementation of this Directive. Provided that they fulfil those criteria, [...] trainees [...] could fall within the scope of this Directive”.

Fourthly, the QFT is also in coherence with relevant EU initiatives in the field of **traineeships and apprenticeships**. These include:

- The EURES portal¹⁷⁹ provides information on available paid traineeships for young people in EU countries, Liechtenstein, Norway and Iceland. Trainees are covered under the EURES Regulation¹⁸⁰ if they are subject to an employment relationship (preamble §6). The Regulation also specifically cites the QFT (preamble §8) stating that it “should be taken into consideration for the purposes of improving the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work.” There is therefore a good degree of coherence.

¹⁷⁵ https://europa.eu/youth/solidarity_en

¹⁷⁶ <https://ec.europa.eu/social/main.jsp?langId=en&catId=89&furtherNews=yes&newsId=9939#navItem-3>

¹⁷⁷ https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.C_.2019.387.01.0001.01.ENG&toc=OJ:C:2019:387:TOC

¹⁷⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019L1152>

¹⁷⁹ https://ec.europa.eu/eures/public/index_en

¹⁸⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:L:2016:107:FULL&from=EN>

- The Digital Opportunity Traineeship¹⁸¹ initiative, funded under Erasmus+, aims to help companies fill vacancies with digitally competent candidates and encourage students and recent graduates from all disciplines to undertake traineeships that strengthen digital skills. The initiative provided cross-border traineeships for up to 6,000 students in 2018-2020. The initiative is coherent with the aims of the QFT, and provides specific opportunities, and funding, for specific digital traineeships.
- The Council Recommendation of 15 March 2018 on a European Framework for Quality and Effective Apprenticeships (EFQEA)¹⁸² is in clear coherence to the QFT, setting out 14 criteria to define quality and effective apprenticeships. Its preamble (§12) specifically cites the QFT. It also reminds (preamble §3) that the European Alliance for Apprenticeships also mobilises offers for traineeships.

Finally, the QFT is also coherent with key **EU funding mechanisms which support traineeships**, including:

- The Youth Employment Initiative (YEI)¹⁸³ is one of the main EU financial resources to support the implementation of the Youth Guarantee schemes until 2023, including traineeships. The Commission report “Traineeships under the Youth Guarantee: experience from the ground”¹⁸⁴ underlines the important role of the YEI in providing financial support to the implementation of traineeship measures across the EU, including for example the initiative ‘New opportunity for youth employment’ in Bulgaria, which provides incentives to employers to hire young people aged up to 29.
- The European Social Fund Plus (ESF+)¹⁸⁵ is the other major EU fund which supports the implementation of the Youth Guarantee. It also provides funding for a large number of measures across the EU which support the implementation of the QFT at national and regional level. One example of such an ESF-funded programme is provided in the box below.

Germany: ESF Jobstarter programme

The German Ministry of Education and Research’s Jobstarter programme, which is co-funded by the ESF, has already promoted almost 300 projects which have provided around 42 000 young people with traineeships. These projects include the ‘1st Job’ project in Göppingen which has started a traineeship blog where companies, young people, parents and teachers can exchange information and network to encourage new jobseekers to take their first steps on the career ladder.

- NextGenerationEU¹⁸⁶ is the temporary financial instrument designed to boost the recovery from the pandemic through transforming our economies and creating opportunities and jobs. As noted in the 2020 Commission Communication “Youth Employment Support: a Bridge to Jobs for the Next Generation” (see above), the aim is to provide some EUR 22 billion to support youth employment, including traineeships, under NextGenerationEU (including the Recovery and Resilience Facility (RRF)¹⁸⁷) and other financial instruments under the EU’s long-term 2021-2027 budget (which includes also the ESF+, presented above). The scope of the RRF, as set out in Article 3 of the Regulation¹⁸⁸ includes “policies for the next generation, children and the youth, such as education and skills”.

¹⁸¹ <https://erasmusintern.org/digital-opportunities>

¹⁸² <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1526484102559&uri=CELEX:32018H0502%2801%29>

¹⁸³ <https://ec.europa.eu/social/main.jsp?catId=1176>

¹⁸⁴ <https://ec.europa.eu/social/main.jsp?catId=738&langId=en&pubId=8163&furtherPubs=yes>

¹⁸⁵ <https://ec.europa.eu/esf/home.jsp>

¹⁸⁶ https://ec.europa.eu/info/strategy/recovery-plan-europe_en

¹⁸⁷ https://ec.europa.eu/info/business-economy-euro/recovery-coronavirus/recovery-and-resilience-facility_en

¹⁸⁸ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R0241>

- Erasmus+¹⁸⁹ supports traineeships abroad for learners enrolled in higher education institutions or vocational education, as well as recent graduates, and apprentices. All organisations implementing mobility activities must adhere to a common set of Erasmus quality standards¹⁹⁰ and all traineeships have a written learning agreement¹⁹¹. As noted above, Digital Opportunity Traineeships are also supported by Erasmus+.

Consultations with EU and national stakeholders confirmed that there is widely seen to be good coherence with relevant EU initiatives, particularly the Youth Guarantee, Youth Employment Initiative and the ESF. However, the consultations and meetings conducted for the study also point to some avenues in which coherence and synergies could potentially be improved:

- Compared to other key EU initiatives (e.g., the Youth Guarantee, Erasmus+), **the QFT clearly lacks visibility and can sometimes be little known** (or indeed unknown) to EU (or national) policymakers working in policy fields with relevance to youth employment and traineeships. More awareness-raising among policymakers could help to promote its use and ensure that the principles are more widely applied. EU funds could support various forms of awareness-raising including mutual learning and sharing of best practices.
- While there is generally good coherence on paper with key policies at EU level, some stakeholders consider that there is less evidence of coherence in ground-level implementation of these EU policies at national and regional level.
- The QFT, as well as other texts which operationalise the implementation of EU initiatives (e.g., the National Recovery and Resilience Plans) often include a reference to quality, however, provide limited practical guidance on how to ensure implementation. More guidance and good practices could help to ensure this coherence.
- Although other relevant EU initiatives do generally include a reference to the QFT, this link could be strengthened and the QFT principles could be give a more prominent focus in the texts and in the implementation of these initiatives, including for example the Youth Employment Initiative, Erasmus+, the ESF+, the traineeship offers on the EURES portal, or the Digital Opportunity Traineeship initiative.
- To promote greater coherence (and compliance), EU funds (e.g., ESF+) could introduce more conditionalities linked to the QFT principles for organisations to receive subsidies for delivering traineeships.
- The EU social partners, as well as international organisations (e.g., ILO), have also published reports and strongly support the implementation of quality traineeships. Putting greater emphasis on their work and role on this issue, and on cooperation with these other key actors, could help to increase coherence and synergies with other key policies.
- The QFT could provide a useful framework for improved monitoring and evaluation of the implementation of key EU initiatives like the Youth Guarantee. Currently, several stakeholders consider that there is insufficient monitoring that traineeships within programmes supported by the ESF do apply with the QFT principles.
- The promotion of more coherence, common messages and linkages with the EFQEA could strengthen both frameworks and avoid any form of 'competition' between the two for employers.

¹⁸⁹ <https://erasmus-plus.ec.europa.eu/>

¹⁹⁰ <https://erasmus-plus.ec.europa.eu/document/erasmus-quality-standards-mobility-projects-vet-adults-schools>

¹⁹¹ <https://erasmus-plus.ec.europa.eu/resources-and-tools/mobility-and-learning-agreements/learning-agreement>

- Developing more synergies with the quality measures implemented for traineeships within Erasmus+ (and/or other EU initiatives) could provide common principles and a more joined-up approach which could provide a stronger overall message around quality traineeships.

4.2. How did the EU intervention make a difference and to whom?

EU added value

Key findings

The **QFT has brought added value to a range of stakeholders on the national and regional level in relation to traineeships in many Member States**. However, the extent of the added value varies depending on whether instruments and measures regulating traineeship quality were already in place, and the extent to which traineeship quality has actually improved since the QFT was adopted.

The primary added-value of the **QFT is that it provides an EU-level structure and framework for national authorities and policymakers to guide policy in this area**. The study found that this has been valuable for national and regional authorities as a whole across the EU, but particularly for national authorities of the newer Member States, that have used the QFT as a guiding instrument for new policy formulation where none existed before. The QFT has brought added value as a framework to other national stakeholders, as well, in particular trade unions and youth organisations, that have been able to use it to further their advocacy on ensuring quality traineeships at the national level. Nonetheless, these same stakeholders also highlighted that the **full EU added value of the Recommendation is limited by weak implementation of the QFT on the ground**. This was highlighted in particular by youth organisations and trade unions in Member States where the impact of the QFT on the ground is less evident.

Views on the consequences of discontinuing the QFT at EU level and the prognosis for a no-policy-change scenario fall into two groups. Some stakeholders – particularly national authorities from Member States where traineeships have been covered in the legal framework since before the QFT came into being – consider that **discontinuing the QFT or continuing it as it stands would have no impact** because its principles are embedded into national legislation. The majority of views, however, indicate clearly that that **QFT should remain in place** with stakeholders identifying a **potential negative impact if the QFT was discontinued**, primarily in the loss of guidance and impetus for the development of national policies on traineeships. There were also a range of stakeholders that called for **strengthening the current QFT** in various ways. These included introducing supporting actions such as mutual learning and exchange or more substantial changes including additional principles to increase its added value.

Added value of the QFT compared to Member State action alone

Evaluation question: What is the additional value resulting from the QFT compared to what could reasonably have been expected from Member States acting at national and/or regional levels?

The mapping, interviews and case studies carried out for this study suggest that **the QFT has added value to a range of stakeholders on the national and regional level** in many Member

States, both in terms of open market traineeships and ALMP traineeships. The extent of the EU added value varies, however, in accordance with factors such as whether instruments and measures were already in place, and the extent to which they have been improved since the adoption of the QFT.

The views across Member States on the added value of the QFT generally align along type of organisation:

National authorities (including Ministries of Labour/Education and PES) consulted in the interviews and case studies almost all agreed that the QFT has brought added value. However, the degree and nature of this value differs. National authorities from AT, BE, DK, FR, SI all recognised that the QFT was useful in setting out common 'best practice' guidelines. They highlighted that the added value of the QFT has been principally in **initiating EU level dialogue and a shared understanding on the topic of quality traineeships**, but at the same time recognised that its direct impact on the legislation and the reality of traineeships in their country has been minimal. National authorities from BG, CY, EL, ES, HR, IE, IT, LT, LV, MT, PL, SK held the view that in addition to setting out a common EU level framework, the added value of the QFT was also in its **impact on the ground**. In these countries, the QFT was used as a framework to draft or amend/improve their own legislation and/or policy frameworks on open market traineeships (in BG, EL, ES, IE, HR, LV, MT, RO, as evidenced in Section 3.2).

Examples of added value of the QFT from national authorities

- In **Bulgaria**, interviewees stated that the QFT has driven changes to the policy and regulatory framework governing open market traineeships.
- In **Spain**, national authorities highlighted that although legislation on traineeships was already in place, more recent legislative amendments are in line with the QFT, thus bringing added value improving implementation of the legislative principles and possibly also implementation on the ground.
- In **Ireland**, it was reported that the QFT provided a framework for the development of the country's own national policy on traineeships and was of great benefit in terms of helping policymakers to do this quickly and effectively.
- In **Greece**, the QFT has been the impetus for a range of practical improvements to traineeships, such as putting into place a register of traineeship providers, a register of companies, and a code of ethics for traineeships.

Arguably, therefore, **the EU added value of this instrument is greatest in countries where national systems were less developed in this area**. This is evidenced in the consultations with representatives from the newer Member States.

- Stakeholders from **Croatia** for example highlighted that as a new Member State without experiences in this field, the QFT helped to lay the groundwork and set policy standards that had an extra weight in the national context as they were established on the EU level.
- In **Romania**, recent legislation on traineeships was modelled on all the principles listed in the QFT.
- In **Bulgaria**, stakeholders emphasised that, since 2014, traineeships offered by large multinational companies have become more structured, including an individual traineeship plan and a mentor.

The value of exchanging with Member States with more developed systems on traineeships was also highlighted: representatives from **Latvia**, for example saw value in the communicating with and learning from other Member States such as Germany, which then resulted in legislative changes to improve the quality of traineeships. It also helped to explain to employers why quality criteria are needed.

Youth, civil society and trade unions generally agreed across all Member States that the QFT has brought added value, identifying the same benefits as listed above. However, they also highlighted that the full EU added value of the Recommendation is limited by weak

implementation. This was particularly raised by youth stakeholders from BG, EL, ES, FI, LV and PL all of whom were identified by the mapping as having moderate, low or very low implementation of the QFT on the ground (see section 3.3).

Employer organisations' views on the added value of the QFT were somewhat mixed. Employer representatives from BE, CZ, FI and NL held the view that the **QFT as an EU-wide framework did not and does not bring much added value because labour markets vary so substantially across EU Member States**, both in terms of skills needs and employment legislation. On the other hand, employer representatives from AT, CY, DE, and IT highlighted that the QFT has brought added value **specifically because of the fact that it is a common but flexible framework** that allows Member States to adapt it to different country contexts. This view was also held by EU level employer organisations consulted during the validation workshop. They highlighted that flexibility in implementing the Recommendation is the key source of its added value, as it allows implementation to be adapted to specific national industrial relations system and education and training practices.

Consequences of potential change to the QFT

Evaluation question: What would be the most likely consequences of discontinuing the QFT at EU level, and what would be the most likely prognosis for a no-policy-change scenario of continuing the QFT as it stands?

Views on the consequences of discontinuing the QFT at EU level and the prognosis for a no-policy-change scenario tend to fall into two groups, according to the interviews, case studies, validation meeting and surveys conducted for this study.

Some stakeholders consider that discontinuing the QFT or continuing it as it stands would have **no impact because its principles are now embedded into national legislation**. There were no clear differences in opinion on this from different stakeholder groups, with social partners, national authorities and youth organisations expressing this view (e.g., from BE, EL, FI, IE, IT, LT, LV, PT, RO).

There were also a range of stakeholders that when asked about consequences of discontinuing or continuing the QFT as it stands in fact highlighted instead the need to **strengthen the current QFT** in various ways. Employer organisations and national authorities (BE, BG, EL, IT, MT, PL) generally called for retaining the QFT as it is but introducing **supporting actions** such as greater awareness raising and mutual learning to help implementation, more quantitative monitoring of implementation and impact and better coordination amongst different actors to implement the QFT effectively. One interviewee noted that it could possibly be accompanied by a voluntary peer review for Member States, or a process, under which countries regularly report on their implementation progress.

Trade unions and youth organisations on the EU and national levels (EL, HR, PL, AT, MT) tended to be more in favour of **altering the QFT in more significant ways in order to increase its added value**. Specific suggestions included new principles on teleworking and online learning/working and remuneration is and making the QFT a binding document or increasing its scope. Recent research published in early 2022 by the European Parliament¹⁹², finds that expanding the scope of the QFT to other types of traineeships would bring added value in reducing the number of individuals in low-quality traineeships.

These suggestions and stakeholder views on them are discussed in more detail in the analysis under 'relevance' in section 4.3 below.

¹⁹² European Parliament (2022): The quality of traineeships in the EU. European added value assessment. <https://policycommons.net/artifacts/2210613/the-quality-of-traineeships-in-the-eu/2966974/>

4.3. Is the intervention still relevant?

Relevance

Key findings

The study shows that the **QFT is highly relevant to fostering the labour market integration of young people**, with the provision of a written agreement and the focus on the learning objectives of the traineeship standing out as the most relevant principles to achieve positive post-traineeship outcomes.

The **QFT overall remains relevant** as issues such as substandard traineeships and complex legal frameworks persist. The impact of the pandemic on the labour market has also **increased the relevance of the QFT** whilst bringing about a need to consider adjustments to the QFT to ensure it remains relevant in the context of the increasingly central role of remote working and digital skills.

Views on the relevance of the **non-binding nature of the QFT are more mixed and tend to align along stakeholder groups**. Trade unions and youth organisations generally find that the non-binding nature of the QFT is not relevant for achieving its objectives as it has allowed for different regulatory approaches at the national level to continue, resulting in differing levels of protections granted to trainees. National authorities and employer organisations consulted highlight instead that the QFT's non-binding nature is highly relevant as it takes into account the diversity of national education and training and labour market environments and strikes a balance between the need to ensure minimum standards and preserve a degree of flexibility.

The evidence from the study is also mixed on whether additional principles on remuneration and access to social protection for trainees would increase the relevance of the QFT. Views align along stakeholder groups, with trade unions and youth organisations consulted throughout the study calling strongly for increasing the relevance of the QFT in fostering labour market integration through principles on remuneration and social protection access. On the other hand, employer representatives consulted during the study express reservations on the relevance of such principles, highlighting that trainees should not be defined as workers, and that offering them the same remuneration and social protection access as regular workers would take away from the main purpose of traineeships to provide a learning opportunity. Whilst further research on the impacts of such an additional principle are needed, it is clear that the **potentially positive impact of remuneration and social protection access should be assessed against potentially adverse consequences**. These include increased costs for traineeships, which could, in turn, result in a reduced offer in terms of traineeship opportunities, and a more competitive labour market for youth.

In this section we assess the extent to which the QFT is (still) relevant to both broader socio-economic needs in the EU and the needs of the target population. We then examine the relevance of the QFT as a non-binding instrument, and finally present the evidence on whether additional principles of the QFT would increase its relevance.

Relevance of the QFT in supporting employment

Evaluation question: To what extent are the principles appropriate for fostering stable labour market integration? Which principles are likely to be the most and the least important?

The evidence clearly shows that the QFT principles are highly appropriate for fostering labour market integration, as they are precisely those that are associated with better post-traineeship outcomes. We outline in this section the principles that are the most relevant and why.

Learning objectives. There is clear consensus across **all stakeholder groups** that establishing the learning objectives of the traineeship is the most relevant QFT principle, as it is considered key in increasing young peoples' employability. Almost all (98%, 254 out of 259) of respondents to the public consultation, identified learning and training objectives as either very important or important to ensure the quality of traineeships. There is agreement on this between trade unions and employer organisations as found during the discussions in the expert meeting and validation workshop undertaken for the study and illustrated by the public consultation results (where 88% (7 out of 8) of companies/business organisations and 100% (6 out of 6) of trade union respondents to the public consultation identify the learning component as particularly important).

The importance of the learning element of the QFT was stressed particularly **in the context of a changing labour market** where the skills demands of employers are constantly evolving. Employer organisations consulted at national level during the interviews and at EU level during the expert meeting and validation workshop stressed that it is precisely the principle on the educational content and learning outcomes of traineeships that represents the main added value of the QFT. For example:

- In **Ireland**, education and training authorities and employers consider learning objectives as crucial to allow traineeships to respond to local labour market needs and, in turn, increase the employability of trainees that can fill specific skills gaps in the local economy.
- In **Bulgaria**, large employers acknowledge that focusing on the learning content is beneficial to both trainees, as they acquire new skills, and companies, as they can address sectoral challenges such as skills shortages through mentoring their trainees.
- **EU level employer organisations** stated that *"traineeships are all about the learning experience and structuring them in a way that helps to train people in the skills needed on the labour markets is where the real added value of traineeships and the Framework lies"*.¹⁹³

Written agreement. The written agreement was the second most mentioned principle considered relevant to fostering stable labour market integration. PES and national authorities in particular highlighted that the written agreement is a "bedrock" of the traineeship as it gives young people access to information on their relationship with employers and allows them to understand what is required from them. The public consultation further supports this: concluding a written agreement at the beginning of the traineeship was identified as a key element increasing traineeship quality by 77% (200 out of 259) of respondents. 71% (24 out of 34) of former or current trainees responding to the public consultation also found the existence of a written agreement as very important for quality traineeships. Transparency on the rights and obligations of trainees which is enabled by a written agreement is seen as particularly relevant by national authorities and PES given that a traineeship is likely a young person's first experience on the labour market.

Supervision. Supervision is considered a relevant principle particularly **by** national authorities and PES (e.g., in IE, IT, MT, PL, RO). The support of a supervisor can help trainees navigate the labour market at the early stages of their career and ensure that the traineeship matches their learning needs. Supervision is also particularly relevant in ensuring the QFT can reach all young people, as young people with lower educational levels may need more hands-on support from supervisors so that their traineeship experience can help them into the labour market. The majority of respondents to the trainee survey indicated that guidance and support from a supervisor, as well as feedback from colleagues would have been helpful in finding a job after the completion of their traineeships (76% or 1.395 out of 1.836, and 75% or 1.377 out of 1.836, respectively).

Duration. The evidence on the relevance of the principle on a 6-month duration of the traineeship is mixed. There are contrasting views (with no clear trends between types of stakeholders) on the optimal length of a traineeship. Some stakeholders hold the view that restricting the duration to 6

¹⁹³ Position of BuisnessEurope submitted for the validation workshop.

months is relevant in ensuring that traineeships do not replace regular jobs; (employer organisations, national authorities, PES e.g. from BE, IE, LU, LT, IT) Other stakeholders believe that a longer experience can be more relevant as it gives the trainee more time to develop experience, whilst also encouraging employers to see traineeships as an investment in their future workforce (e.g. youth organisations, trade unions, PES in BE, EL, IT, ES).

Flexible traineeship duration: examples

In **Italy**, the current legal framework on traineeship, as reformed in 2017, establishes that traineeships should last for a minimum of 2 weeks and not exceed 12 months¹⁹⁴. However, flexibility is given to Regions to further regulate traineeships. For example, Lombardy differentiates the duration of the traineeship according to the level of the skills to be acquired: the more complex the learning objectives are, the longer the traineeship can last. The maximum length of a traineeship - extensions included – is 6 months for traineeships aimed at the acquisition of skills corresponding to EQF level 2 and 3; or 12 months for traineeships aimed at the acquisition of skills corresponding to EQF level 4 and over.

In **Spain**, national level frameworks regulate traineeships. However, as PES are managed by regional authorities, Regions play a key role in the implementation of ALMP traineeships. As a result, ALMP traineeship conditions vary across the 17 regional PES. For example, in the region of Asturias, the maximum duration of an ALMP traineeship is 250 hours¹⁹⁵, while in the Aragón region, ALMP traineeships can last can be between 50 and 350 hours¹⁹⁶. Different traineeship lengths are offered to respond to the different characteristics regional labour markets (e.g., employer needs).

Source: Case studies – Italy and Spain, Ecorys 2022

The scope of the QFT as a whole. Whilst the evidence overall shows that the QFT's principles are relevant to supporting labour market integration, certain stakeholder groups highlighted that the scope of the QFT as a whole limits its relevance. As outlined under section 4.1 (coherence), the QFT's exclusive focus on open market and ALMP traineeships excludes traineeships that are part of formal education or training programmes. As these are widely available in many Member States and are equally relevant for young people's employability, some stakeholders (from different groups) suggested that this narrow scope compromises the degree of relevance of the QFT.

However, these views were not shared by **employer organisations** and some national authorities consulted during the validation workshop. They raised concerns that broadening the scope of the QFT would result in clashes with existing legislation regulating compulsory traineeships and/or traineeships that are part of education and might further complicate ongoing discussions around issues such as remuneration.

Relevance of the QFT to changing needs

Evaluation question: Has the understanding of traineeship quality evolved over time? How well do the principles of the QFT still correspond to the needs within the EU? How well adapted is the QFT to a post-COVID-19 world, a changing labour market and the latest perspectives of stakeholders and citizens?

The QFT principles overall are **still very relevant to respond to needs within the EU in terms of supporting young people to enter the labour market**. However, adjustments to ensure that the

¹⁹⁴ https://www.comune.roma.it/web-resources/cms/documents/Linee-guida_in_materia_di_tirocini_accordo-25-maggio-2017.pdf

¹⁹⁵ See, model of agreement between the regional PES and the training provider in Asturias at: <https://trabajastur.asturias.es/documents/36440/1046364/Convenioplal2021.doc/6b61c5a6-f812-26c5-ec04-3776087be825?t=1621511829580>

¹⁹⁶ See leaflet issued by Aragón PES at https://inaem.aragon.es/documents/51284/140067/diptico_programa_practicas.pdf/c10c2e96-9741-87d4-8b76-8a5f9b8f76f4?t=1640014505371

QFT can respond to new challenges posed by the changing nature of work may be warranted. The challenges, their impact on the labour market and possible adjustments that may be required from the QFT are outlined below.

Skills mismatches. Megatrends such as globalisation, demographic change, technological advancements and digitalisation are increasing mismatches between skills demand and supply. The evidence from the study shows that, by fostering the provision of quality traineeships which include a strong learning dimension, the QFT remains relevant to supporting young people to develop the skills needed in the labour market; and to helping employers train their own future workforce to match their skills needs. However, EU level employer organisations as well as and national employers (e.g., from DK, ES, IT, IE) stressed that **there is room to increase the relevance of the QFT in this area through an increased focus on the learning component of the QFT**. The following suggestions on how to achieve this emerged:

- Increased efforts by traineeship providers to map their own skills needs and assess trainees' competencies before/after the traineeships (e.g., through pre and post skills assessment) and offer more targeted opportunities and more tailored supervision
- A greater focus on implementing QFT principles on skills recognition. This could be achieved through national authorities developing more coherent and impactful approaches to recognition and certification in cooperation with employers.
- Greater support and guidance for employers (e.g., through training), in particular small and medium sized enterprises (SMEs), to be able to carry out skills assessments and provide adequate supervision.

	Approaches to traineeships and skills: examples
IE	<p>In Ireland, the Career Traineeship (CT) pilot project aimed to ensure model of training provision that was employer-led and directly responsive to skills demand in the local and national economy¹⁹⁷. In developing the CT model, SOLAS prepared tools to support Education and Training Boards (ETB) and employers to successfully understand and adopt the model and developed training for workplace supervisors for them to effectively support trainees¹⁹⁸. Integration of Directed and Work- Based Learning.</p> <p>Building strong employer partnerships was considered the key success factor of the programme, as it ensured employer involvement in the scoping, design, development, and provision of work-based learning opportunities for learners. An evaluation of the CT pilot programmes in March 2018 found that the CT model had been successful in delivering training that focused on employment and skills outcomes:</p> <ul style="list-style-type: none"> • 94% of trainees who completed the CT programme were employed after the traineeship ended. • Employers praised the commitment, skills, and job-readiness of the trainees on completion,¹⁹⁹ and trainees, found that the CT model offered “an opportunity to enhance knowledge, skills, and competence, to gain tangible work experience and proficiency in applying those skills and capabilities in real work settings, and access to employment as well as recognised qualifications to support future career ambitions”²⁰⁰.
IT	<p>In Italy's Emilia Romagna Region, public authorities responsible for validation are involved in the management of ALMP traineeships: these certifying body entrusted with officially certifying the skills gained by trainees at the end of the learning path. For each ALMP traineeship, the individual training</p>

¹⁹⁷ ICF (2018) Developing Best Practice in Work-Based Learning - An Evaluation of the Career Traineeship Pilot, Final Report, ICF Consulting Services/Fitzpatrick Associates, 28 March 2018

¹⁹⁸ Ibid.

¹⁹⁹ Ibid

²⁰⁰ Ibid

plan has to include a reference refer to a recognized vocational qualification, and the learning experience has to lead to the acquisition of at least one certifiable competence. Official certification is then provided to trainees at the end of their traineeship experience. Any trainee who spent at least 45 days at the provider is entitled to the assessment of the knowledge and skills developed.

COVID-19 impact. The evidence from the study clearly shows that the **QFT remains relevant in the context of the impact of the COVID-19 pandemic**. The COVID-19 crisis disproportionately affected young people with the youth unemployment rate in the EU increasing three times faster than that of the older population between February 2020²⁰¹ and April 2021²⁰². Whilst rates are returning to pre-pandemic levels, this impact is evidence of young people's heightened vulnerability to crises, and of the continued relevance of instruments such as the QFT to support their transition to autonomy. Stakeholders across a range of groups (youth organisations, trade unions, national authorities) underlined that the pandemic has further **reinforced existing inequalities**, making the QFT and its objective to ensure that all young people can access quality traineeships even more relevant today (e.g., BG, CY, HR, EL, ES, IE, IT, EL, LT, LV, MT, RO, SE, SI, SK).

COVID-19's impact on traineeships: Ireland

In **Ireland**, all traineeships must include a minimum of 30% on-the-job learning. During the pandemic, to comply with this requirement and overcome the lack of access to work placements, specialist equipment or facilities,²⁰³ some traineeship providers ensured that training could take place through online courses, and modified arrangements to implement alternative assessments or demonstrating learning outcomes through recognition of prior learning (RPL) from previous work experience. Deferral of placements was also a common occurrence.²⁰⁴ However, the backlog of deferred work experience placements, combined with ongoing challenges in securing placements, still poses concerns.

Additional challenges include lack of face-to-face interaction, reduced motivation, and engagement (particularly from learners with lower levels of digital skills), increased marginalization of learners from disadvantaged groups who may not have the means to undertake remote training.²⁰⁵

Nonetheless, there is also evidence that **the rise of remote/hybrid work as a result of the pandemic may require adjustments to the QFT to ensure it remains relevant**. While the share of EU workers working exclusively from home is now declining (from 34% in 2020 to 12% in 2022), hybrid work has gained ground.²⁰⁶ The case studies from **Bulgaria** and **Ireland** show that employers have had to adapt to this new reality: almost 87% of traineeship offers during the pandemic were for online work-based learning.²⁰⁷ This has implications on the relevance of the QFT. Whilst the QFT principles can be applied to remote or hybrid traineeships, the **addition of specific provisions that directly address remote and hybrid working may be important in this context**. EU level stakeholders and national authorities, trade unions, and PES from a number of countries (FI, IT, MT, SK, CY, PL)²⁰⁸ reported that the potential risks of remote/hybrid traineeships (listed in the Table below) may limit the relevance of the QFT in the workplace of today and the future. It is important to note, however, that EU level employer organisations participating in the validation workshop had less positive views on the need for remote working

²⁰¹ <https://ec.europa.eu/eurostat/documents/2995521/10662618/3-01042020-AP-EN.pdf/be3d73ee-6715-824b-2c23-f0512f12bdc6>

²⁰² <https://ec.europa.eu/eurostat/documents/2995521/11563107/3-01062021-BP-EN.pdf/fe3aeb52-a040-12ae-5c63-fd7ab4b59bbd>

²⁰³ QQI (2020) The Impact of COVID-19 Modifications to Teaching, Learning and Assessment in Irish Further Education and Training and Higher Education A QQI Evaluation. QQI, Dublin.

²⁰⁴ Ibid.

²⁰⁵ Ibid.

²⁰⁶ https://www.eurofound.europa.eu/sites/default/files/ef_publication/field_ef_document/ef22042en.pdf

²⁰⁷ Stefanelli, C. & De Giorgi F (2021). Experiences of Virtual Internship in Europe.

²⁰⁸ The list of Member States is limited to those countries where consultees explicitly mentioned the impact of the need to ensure that traineeships are better adapted to respond to digitalisation as a result of the pandemic.

principles to increase relevance, pointing out the lack of data on the number of traineeships being offered remotely, and the fact that digital traineeships might only exist in certain sectors.

Table 22. Potential risks of remote/hybrid traineeships

Potential impact of remote/hybrid traineeships	
Guidance and mentorship ²⁰⁹	<ul style="list-style-type: none"> Reduced opportunities for trainees to interact and engage with fellow learners, mentors, and colleagues, with a potential negative impact on learning outcomes. Digital learning not suited to the individual learning styles of all trainees, and therefore affecting the educational purpose of traineeships.
Mental health wellbeing	<ul style="list-style-type: none"> Lack of socialisation negatively affecting motivation and engagement, and, in turn, trainees' mental health wellbeing. A shift towards more flexible working arrangements leading to trainees feeling pressured to stay connected beyond regular working hours, with a detrimental impact on their mental health, particularly as current legislative developments on the right to disconnect tend to not explicitly consider traineeships.
Accessibility	<ul style="list-style-type: none"> Further marginalisation of disadvantaged groups lacking digital skills and/or access to adequate ICT equipment. Moreover, higher energy prices, and their impact on household finances, could contribute to making remote/hybrid traineeships less accessible for disadvantaged youth. At the same time, the option to undertake a traineeship remotely could positively impact youth living in rural areas, who could have access to more opportunities, and it could support trainee mobility (i.e., trainees undertaking remote traineeships in another city/region within the same Member State).
Costs	<ul style="list-style-type: none"> Increased costs for traineeship providers to cover for additional training for mentors/supervisors and/or "working from home" allowances for trainees.

Source: Ecorys own analysis based on the case studies for Ireland and Bulgaria, as well as interviews with national level stakeholders (PES, national authorities, trade unions, employer organisations, education experts) from Finland, Belgium, Greece, Poland, Malta, and EU and international organisations.

Other factors affecting relevance. Evidence from the interviews and desk research also identified several factors that reduce the extent to which the principles of the QFT can respond to needs at EU and national level:

- Heterogeneity and intersectionality:** Interviewed youth organisations and trade unions at EU and national level (e.g., BG, CY, EL, RO, SI) and national authorities (e.g., FR) highlighted that the QFT does not sufficiently take into account the challenges faced by specific groups of young people within the broader youth cohort. Accessing and undertaking traineeships can be particularly difficult for young people with specific characteristics (e.g., dependant on ethnic and religious background; migrant background, Roma, socio-economic status; gender; sexual orientation; etc.). Stakeholders highlighted that the fact that the QFT does not include tailored measures to support the specific needs of these groups of young people, affects its relevance and the extent to which it can promote inclusion and diversity,

²⁰⁹ As mentioned in the case study for Ireland and Bulgaria, as well as by interviewed stakeholders (PES, national authorities, trade unions, employer organisations, education experts) from Finland, Belgium, Greece, Poland, Malta and national authorities from Greece, as well as interviewed representatives from EU and international organisations.

and contribute to social cohesion as a cross-cutting EU priority (see section 4.1). Examples of such tailored measures mentioned by stakeholders include providing more guidance, mentoring, as well as a more tailored approaches to learning pathways or, for young people with disabilities ensuring flexible working and learning arrangements to adapt to their specific workplace needs.

- **Differing labour standards:** The continued relevance of the QFT varies depending on the level of implementation and protection in a Member States' general social and labour standards. Employer organisations and trade unions (AT, FI, DE, DK) held the view that the QFT is less relevant in their countries as social and labour standards are generally perceived to be high. Conversely, interviewed stakeholders from national authorities and trade unions in Member States with overall higher levels of youth unemployment (ES, IT, PL) stated that young people's situation on the labour market continues to require attention.

Relevance of the QFT as a non-binding Council Recommendation

Evaluation question: With due respect to the principle of subsidiarity, how well does the nature of the QFT as a (non-binding) Council Recommendation correspond to the needs and the socio-economic problems to be solved? Has this changed over time, and are there significant differences between Member States?

The study has found that views around the specific nature of an EU framework on quality traineeships differ across stakeholder groups. Youth organisations and trade unions²¹⁰ have been and continue to call for a legally binding instrument to regulate traineeships, whilst employer organisations and most Member States tend to support non-binding guidelines.²¹¹ These views are explored in detail in the sections that follow.

The non-binding nature of the QFT leaves room for Member States to decide whether and the extent to which apply the QFT: This view is clearly held by youth organisations, trade union representatives, as well as a minority of national organisations consulted through the interviews, expert group, and validation workshop. For example:

- Civil society and trade union representatives from **Spain**, **Italy** and **Slovenia** noted the Recommendation is *“extremely weak and does not present any necessary requirement for state parties to implement the framework”*. Consequently, according to these stakeholders, its non-binding nature undermines the purpose of the QFT, as it has allowed for excessive flexibility, often not leading to concrete changes.
- PES and national authorities in **Bulgaria** and **Poland** underlined a tendency not to implement EU-level frameworks unless they are legally binding, or there is an already existing political will to prioritise the topic.
- At **EU level**, trade unions and youth organisations support these views, noting that non-legally binding quality standards rarely influence legislation at the national level and that *“a legally binding framework would encourage the implementation of regulations in Members States and better ensure fair and quality traineeships.”*

The non-binding nature of the QFT is very relevant in that it allows Member States to retain the necessary flexibility to implement the framework, taking into account existing national industrial relations and education and training practices: This view is clearly held by employer organisations and the majority of national authorities consulted for the study. Interviewed employer

²¹⁰ <https://www.etuc.org/en/pressrelease/quality-framework-traineeships-deceiving-compromise-reached-coreper>

²¹¹ <https://www.businessseurope.eu/sites/buseur/files/media/imported/2014-00163-E.pdf>

representatives both at the EU and national level (e.g., DK, DE, ES, FI, HU), as well as representatives from EU and international organisations, stressed that a non-binding tool is appropriate and proportionate to the aims of the initiative, as it does not overburden employers and lead them to being “*constrained by unnecessary regulation*”. For example:

- National level stakeholders across different groups (employer organisations, national authorities, PES in BE, CY, DK, EL, FI, NL agreed that flexibility in applying the QFT is essential. National authorities and trade unions from **Cyprus** commented that the QFT principles are relevant but only provided that they can be adapted to changing labour market needs; several stakeholders from **Poland** stated that to foster stable labour market integration, the QFT needs to remain adjustable to real-time changes in the national/regional labour market, highlighting that if it is not “*it will certainly not be respected among employers*”.
- These stakeholders highlight that rather than establishing stricter rules, priority should be given to fostering mutual learning between Member States. These national level stakeholders also highlighted that a non-binding instrument might ease the process of reinforcing the QFT, thus allowing the addition of new principles if needed without too much contention (which would presumably not be the case if the QFT were a binding instrument).
- Interviewed employer organisations in **Austria** recalled that national legislation already goes beyond the QFT principles, while employer representatives in **Finland** believe that a legally binding instrument “*could run the risk of coming into conflict with other national measures and regulations that currently go beyond the principles set out in the QFT Recommendation*”.

A 2022 study conducted by the European Parliamentary Research Service (EPRS) adds weight to the above concerns, stating that a different legal instrument such as a directive would “*most likely result in a more limited coverage of different types of traineeships*” and would not necessarily allow for the introduction of additional quality principles, whereas an updated Council Recommendation would be the preferred option to ensure better protection for trainees.²¹²

Increasing relevance: possible additional dimensions for the QFT

Evaluation question: Are there any additional dimensions that should have been added to the principles from the start or have in the interim proven to be lacking? How – and how likely – would such additions add to quality traineeships, and, in turn, their contribution to a stable labour market integration?

Evidence indicates that **the relevance of the QFT in fostering stable labour market integration may increase with the addition of a number of principles**, in particular in relation to remuneration and access to social protection of trainees. However, there are different views on the relevance of this amongst the main stakeholder groups²¹³ which are further outlined in the sections that follow.

Remuneration

The QFT does not include a principle calling for traineeship providers to provide remuneration to trainees. Nonetheless, remuneration is a key topic in the policy debate on traineeships. The survey of trainees conducted for this study found that 4 out of 10 trainee respondents were not compensated for their traineeship (39% (716 out of 1.836)). Legally speaking, in 2021, 10 out of 27

²¹² European Parliamentary Research Service (2022), The quality of traineeships in the EU.

²¹³ See for example the positions from the European Youth Forum and Business Europe <https://www.youthforum.org/news/joint-letter-condemning-council-recommendation-on-quality-framework-for-traineeships>
<https://www.buisseurope.eu/sites/buseur/files/media/imported/2014-00163-E.pdf>

Member States (AT, CY, DK, EE, FI, HR, LT, MT, PL, SE) did not have a legal obligation to pay trainees (undertaking open market traineeships)²¹⁴. Some Member States already include provisions in their national frameworks on remuneration, as outlined in the box below:

Approaches to remuneration: examples from Member States	
BG	In Bulgaria, open market traineeships are regulated by the Labour Code. According to Art. 233b of the Labour Code, the amount of the remuneration received by trainees shall be determined at the discretion of the employer but shall not be lower than the national minimum wage.
IE	In Ireland, open market traineeships fall under the National Minimum Wage Act. ²¹⁵ In 2019, trainee-specific pay rates under the National Minimum Wage Act, were abolished and rates of pay for employees are now based on age through the implementation of the Employment (Miscellaneous Provisions) Act. While there is currently no legal definition of an ‘trainee in Irish law, a new “National Minimum Wage [Payment of Interns] Bill 2022”, ²¹⁶ has been proposed by the Labour Party, which would ban unpaid traineeships, establish a comprehensive definition of “trainee” and include traineeships under the National Minimum Wage Act.
IT	In Italy, only ALMP traineeships are possible, and they are regulated by law. The current legal framework establishes minimum standards at national level, leaving Regions the flexibility to further regulate traineeships. According to the national framework, as reformed in 2017, traineeship providers must pay a mandatory monthly allowance to trainees, starting from a minimum of EUR 300 per month. The monthly allowance has been increased in several Regions up to a maximum of EUR 800 in Lazio.

The views on whether a principle on remuneration would increase the relevance of the QFT differ though.

On the one hand, there is a clear consensus amongst trade unions, youth organisations and EU and international agencies that a **requirement to pay and/or reimburse trainees would increase the relevance of the QFT** in fostering stable labour market integration. Trade unions and civil society organisations consulted (from e.g., BG, CZ, DE, ES, LT, NL, PL, SI),²¹⁷ held the view that **paid traineeships result in higher levels of productivity, a better reputation of employers, and higher take up and retention rates** and should be seen as an investment, with the benefits outweighing the costs. Representatives from international organisations shared this view, highlighting that fair remuneration results in a win-win situation for trainees and traineeship providers alike, as *“payment brings in better quality trainees and it encourages traineeship providers to put in place a well-thought-out traineeship experience”*.

Recent studies support these arguments and document the **positive effects of paid traineeships** on labour market outcomes for young people.

- A 2018 study by the International Labour Organization (ILO), states that *“there is a relationship between the payment of interns and their subsequent (post-internship) labour market outcomes”*,²¹⁸ as unpaid traineeships are negatively correlated to salary, employment outcomes, job search duration and job satisfaction. The ILO study maintains that paid opportunities lead to “significantly better employment outcomes”, as they are associated with better job offers and salary levels.

²¹⁴ European Network of Public Employment Services (2021), Remuneration of Open-Market Traineeships in EU-27.

²¹⁵ Houses of the Oireachtas (2022) National Minimum Wage (Payment of Interns) Bill 2022: Second Stage, Seanad Éireann debate -25 May 2022, Vol. 285 No. 8

²¹⁶ Workplace Relations Commission (Online) Unpaid Work: Available at:

https://www.workplacerelations.ie/en/what_you_should_know/hours-and-wages/unpaid%20work/. Accessed: 20 July 2022

²¹⁷ The list of Member States is limited to those countries where consultees explicitly mentioned the importance of remuneration in response to open questions around gaps in the principles currently included in the QFT.

²¹⁸ International Labour Organization (2018), Interns and outcomes: Just how effective are internships as a bridge to stable employment?

- A 2021 ILO study²¹⁹ found that unpaid traineeships have a detrimental effect on young people in both the short and medium term as they do not improve the chances of accessing employment and/or lead to reduction in earning power, whereas paid traineeships improve the employability of graduates and lead to positive labour-market outcomes.²²⁰
- Research on the returns of unpaid traineeships, based on a survey targeting graduates from English and Welsh universities between 2005 and 2011 shows that former unpaid trainees face a salary penalty of approximately £3500 per year compared to those who went straight into paid work, and £1500 compared to those who continued to study²²¹. Former unpaid trainees gained a significant return only compared with those who remained unemployed, as they were 6.4% more likely to be “very satisfied” with their career progress.²²²

Trainees themselves also view pay as highly relevant. Benefits linked to pay were the most frequently selected as essential or important for trainees when undertaking a traineeship, as follows (Figure 10):

- 87% (1.597 out of 1.836) of trainees surveyed reported that being paid for their traineeship was important or essential for them.
- 84% (1.542 out of 1.836) of trainees surveyed reported that being paid at least the minimum wage was important or essential.
- 83% (1.524 out of 1.836) of trainees surveyed reported that being paid for any overtime done was important or essential
- Moreover, when asked about aspects that would have improved their traineeship experience, trainees responded that being compensated or sufficiently compensated for their work would have been beneficial. Even those trainees who received an allowance during their traineeships indicated that their compensation was either sufficient to a small extent (40%, 734 out of 1.836) or not sufficient at all (22%, 404 out of 1.836) to cover basic living costs.

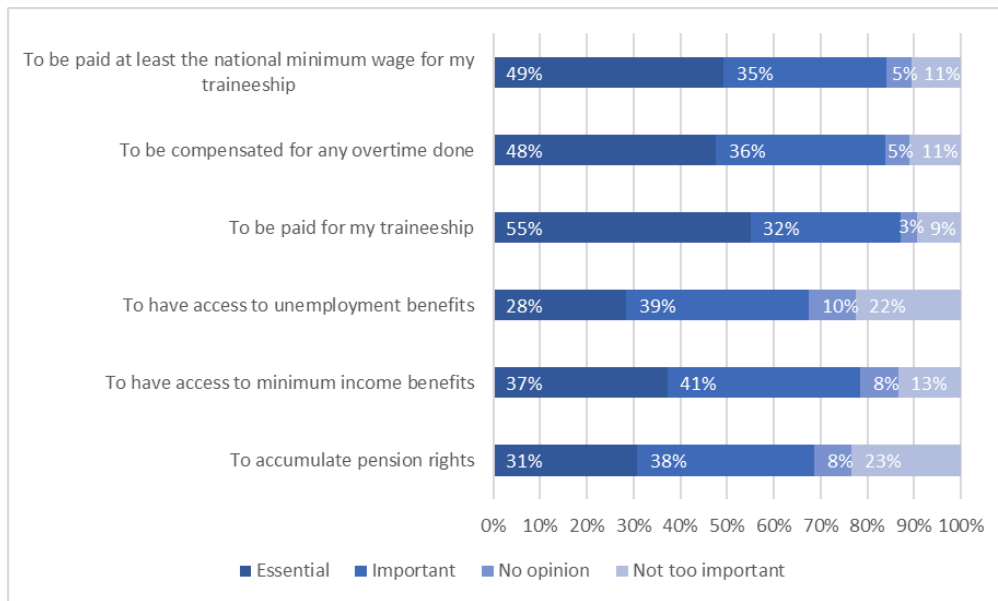
The public consultation further supports these findings, as 76% (198 out of 259) of respondents stated that ensuring trainees are paid would increase the quality of traineeships to a large extent, including the majority of enterprises (60%, 3 out of 5), public authorities (91%, 77 out of 85), trade unions (100%, 6 out of 6), and current/former trainees (74%, 26 out of 34).

²¹⁹ International Labour Organization (2021), Internships, Employability and the Search for Decent Work Experience.

²²⁰ These findings are further confirmed by academic research, highlighting that undertaking unpaid work after graduation diminishes the odds of being employed – see Purcell et al. (2013), Transitions into employment, further study and other outcomes.

²²¹ IZA (2017), Access to and Returns from Unpaid Graduate Internships

²²² Ibid.

Figure 10. Results of the trainee survey: Importance of compensation and pay benefits during traineeships

Source: QFT online survey 2022, N=1836, Ecorys, 2022

Evidence also shows that a principle on remuneration would likely increase the relevance of the QFT in ensuring **equal access to traineeship opportunities**. According to civil society and youth organisations and trade unions, lack of pay excludes young people that cannot financially support themselves from traineeship opportunities, with negative consequences for social cohesion more broadly in the long term. Young people from higher income or socio-economic backgrounds are generally more willing to undertake unpaid work in order to progress into paid employment as they are better equipped to face the risks and the financial costs linked to taking an unpaid traineeship (e.g., moving to/paying rent in a bigger city; commuting).²²³

On the other hand, the majority of interviewed employer organisations did not refer to pay among potential new principles that would increase the relevance of the QFT. When the proposal of introducing remuneration as a principle of the QFT was specifically mentioned by the research team in consultations, **most employer representatives at the national and EU level highlighted the potentially negative consequences and/or the challenges of introducing such a principle**. The first of these challenges is that the provision of remuneration would further blur the distinction between trainees and workers. The argument expressed by these stakeholders is that as trainees do not qualify as workers, they should “*not receive the same salary and benefit package as other employees, due to their status*”.²²⁴ Employer organisations from the EU level in particular stress that the status of trainee and worker should remain distinct and that definitions should not be set at EU level to avoid interference with the national status of workers and existing industrial relations. Terminology is important in this discussion: employer organisations argue that “compensation” should be used to define any form of allowance to be provided to trainees, rather than “remuneration” so as to support the distinction between trainee rights and worker rights. There is evidence from employer organisations interviewed on the national level that this is important. In **Austria**, for example, separate remuneration levels for trainees are now set through collective bargaining agreements, which has removed significant legal uncertainty among employers who previously had to determine whether traineeships should be classified as an employment relationship or not.

²²³ IZA (2017), Access to and Returns from Unpaid Graduate Internships

²²⁴ Anonymous quote from a national employer organisation interviewed during the study.

Employer organisations consulted in this study (from AT, BG, ES, IT) also raised that a principle on remuneration of trainees would incur **additional costs for traineeship providers** thus potentially discouraging employers from offering traineeship opportunities at all. This is particularly so for small and medium sized enterprises.

It is important to note, however, that **employers consulted in this study were not unanimously opposed to remuneration of trainees**. This stands in contrast to the views in favour of remuneration which were held by all trade unions and youth organisations consulted. Interviewed employer organisations from several Member States (AT, CZ, DE, FI, IT, LT, NL) recognised the benefits that paid traineeships can bring to traineeship providers as outlined below:

- **Ensuring that all young people, including those from more disadvantaged backgrounds can access traineeships.** For example, an employer representative from Lithuania noted that “*young people from poorer families can hardly afford non-paid activities*” and calling for “*some remuneration for trainees*” to overcome this. An employer organisation in **Austria** highlighted that unpaid work might increase existing gender inequalities, as more traditionally female-dominated sectors (e.g., hospitality, third sector) tend to have a higher share of unpaid traineeships as opposed to more male-dominated industries (e.g., STEM), potentially leading to greater gaps and inequalities later in life.
- **Avoiding reputational damage that would come from offering low quality opportunities.** An employer representative from **Germany** mentioned that fear of loss of reputation is particularly relevant for large companies, stating that “*there have always been reported cases of misuse of traineeships as cheap employment, but this tends to be restricted to isolated cases, often smaller offices - whereas large companies simply cannot afford offering precarious traineeships*”.
- **Cultivating a greater sense of ownership on the job, which may lead to higher productivity from the employee.** In **Italy**, employer representatives outlined that the introduction of a mandatory monthly allowance is an incentive for trainees to complete traineeships. In **Finland** an employer organisation highlighted that paying trainees gives traineeship providers “*the right to demand more and expect the employee to deliver*”. Similarly, in **Luxembourg**, the minimum pay for trainees established by new legislation implementing the QFT was also identified by employer representatives as having a positive impact on trainees.
- **Lastly, for some other employer organisations, paying trainees was considered a standard and fair practice:** consultees from **Finland** and **Czechia** mentioned that “*employers consider it obvious that they should pay fair wages for a job*”, and that “*if workers are engaged in productive activities, they should be fairly paid*”.

Social protection

As with remuneration, **the study has revealed a clear difference in views across stakeholder groups** on whether an additional principle on social protection access of trainees would increase the relevance of the QFT.

Different regulatory approaches to traineeships and the status of “trainee” and “traineeship” at the national level, means social protection entitlement for trainees is often unclear. Research²²⁵ highlights that in the context of open market traineeships, employers do not have an obligation to contribute to social security for trainees in 10 out of 27 Member States.²²⁶ For the remaining 17 Member States, social security coverage is either at the same level as any employee or only

²²⁵ European Network of Public Employment Services (2021), Remuneration of Open-Market Traineeships in EU-27.

²²⁶ AT, CY, DK, EE, FI, HR, LT, MT, PL, SE.

includes specific types of coverage.²²⁷ Table 23 below provides a further breakdown of gaps in social protection coverage for paid trainees in the EU.

Table 23. Social protection coverage of trainees

Type of benefit	EU Member States where trainees are covered
Unemployment benefits	EL, FR, IT, LT, MT, NL, PL, RO
Sickness benefits	DK, FR, HU, LT, NL, PL
Maternity benefits	FR, HU, IT, LT
Accident and occupational injuries	<i>n/a</i>
Old age pension	EL, FR, HU, IT, LT, MT
Invalidity	<i>n/a</i>

Source: European Commission Staff Working Document - Accompanying the document: Proposal for a Council recommendation on access to social protection for workers and the self-employed (SWD (2018)70 final)

Youth and civil organisations at the national (e.g., EL, PL, SI) and EU level consulted highlighted that giving trainees access to social protection through a new QFT principle would increase the relevance of the QFT by setting trainees on a positive trajectory in the world of work. Social protection is important for trainees themselves as highlighted by the survey of trainees:

- 84% (3.181 out of 3.787) of trainees surveyed consider being covered by health and sickness benefits, and 79% indicated considers having access to paid sick leave as essential or important.
- 78% (2.954 out of 3.787) of trainees surveyed indicated that having access to minimum income support is either essential or important.
- 69% (2.613 out of 3.787) of trainees surveyed indicated that accumulating pensions rights through traineeships is either essential or important.
- 68% (2.575 out of 3.787) of trainees surveyed indicated that having access to unemployment benefits is either essential or important.

The public consultation reinforced these findings, as ensuring that trainees have access to a variety of additional benefits received generally broad support: health and sickness benefits (84%, 217 out of 259), minimum income (78%, 202 out of 250), pension rights (76%, 197 out of 259).

Recent research further highlights the negative impact of gaps in social protection coverage for trainees.²²⁸ Trainees are often excluded from receiving unemployment benefits after their traineeship in many countries.²²⁹ Even when eligible, trainees tend to receive benefits for a shorter period than older workers, due to their limited contributory history.²³⁰ The countries where employers do not contribute to social security for their trainees are the same as those in which trainee remuneration for open market traineeships is not regulated, leading to a situation where trainees are left without any income support (either in the form of a salary, or benefits).²³¹

However, employer organisations, particularly at EU level, consulted through the interview programme and the validation workshop questioned the relevance of a QFT principle on

²²⁷ Ibid.

²²⁸ European Social Policy Network (2021), Access to social protection for young people.

²²⁹ Ibid.

²³⁰ Ibid.

²³¹ European Network of Public Employment Services (2021), Remuneration of Open-Market Traineeships in EU-27.

access to social protection for trainees. According to this stakeholder group, such a principle would not only result in trainees effectively being considered as workers, but it would also interfere with national approaches and regulations, negatively affecting the flexibility that the QFT as a Council Recommendation should continue to allow for.

As with remuneration, employer organisations highlighted the increased costs and administrative burden that would follow the provision of social protection coverage for trainees, which could discourage businesses, and small and medium sized enterprises (SMEs) in particular, from offering traineeships. As highlighted by employer representatives from **Bulgaria**, these costs cannot be fully measured as companies cannot predict whether trainees will be hired as regular employees, making it difficult for employers to assess whether investing in social protection would be offset by savings related to HR costs (e.g., for recruitment and training) in the longer term.

Given the mixed views from employers, it is clear that the introduction of an obligation to provide remunerated traineeships and ensure social security coverage may result in **adverse consequences**. Increasing the costs of traineeships for employers may result in either a greater need for public subsidies, particularly for SMEs, or in a reduced number of traineeships offers. A potentially reduced number of traineeships could have a negative impact on young people transitioning from education to employment, as they would have access to fewer opportunities and to an increasingly competitive labour market, with the risk of further extending their school-to-work transition.

Mentoring

As outlined in section 4.1 (effectiveness), the principle related to the learning content of traineeships is seen as particularly beneficial for ensuring traineeships foster stable labour market integration. The study research (interviews, trainee survey, and expert group) showed that greater focus on this aspect, in particular through the provision of adequate mentorship, may be one way to increase the relevance of the QFT.

Stakeholders consulted from a range of groups (youth organisations, trade unions, PES, and national authorities) agreed that the provision of adequate mentorship is key in ensuring that the QFT remains relevant particularly in the context of new challenges. The trainee survey found that despite 69% (1.267 out of 1.836) of trainees surveyed reporting they had a mentor or supervisor, 43% (789 out of 1.836) of them disagreed that their supervisor was specifically trained for a supervisory role. However, while employer representatives from **Croatia** and **Bulgaria** pointed out the importance of adequate mentorship to support the development of trainees, several EU and national-level employer organisations, as well as national authorities recognised that appointing a mentor to guide trainees and monitor their progress presents additional costs, which can become an obstacle for traineeship providers, particularly SMEs.

Beyond individual rights, the study identified the following elements that would increase the relevance of the QFT and its impact on traineeship quality²³²:

- Investing in better data collection on the situation of traineeships at EU and Member State level;
- Promoting a more effective enforcement and monitoring of measures, particularly with regards to open market traineeships;
- Considering more stringent requirements for employers to host/receive financial support to hire trainees, for example by establishing trainee quotas, or ensuring that the provision of EU

²³² The list of potential additional principles does not follow an order of importance/priority.

and national funding and/or tax exemptions are conditional to the compliance with the QFT principles;

- Increasing efforts to raise awareness of the added value of traineeships both for trainees and traineeship providers, including through the involvement of and better cooperation with relevant stakeholders (e.g., social partners; youth organisations; education institutions);
- Working towards a common definition of trainee and traineeship as a way to ensure better coherence in regulatory approaches at Member State level.
- Encouraging companies to employ trainees after the traineeship, or to help trainees find a job after the traineeship.

4.4. Conclusions

The following section presents the conclusions from the study in relation to the five evaluation criteria.

To what extent was the intervention successful?

Effectiveness

The principles of the QFT have been enshrined **to a moderate degree in national legislation/frameworks for traineeships**, with key differences across Member States and between types of traineeships. 14 Member States have reformed or introduced legislation/policy to implement the QFT in their legislation/ policy frameworks since its adoption. Efforts to implement the QFT are more evident in national legislation governing ALMP traineeships however: 18 Member States are fully/mostly implementing the QFT principles in national legislation/policy for ALMP traineeships, compared to seven Member States for open market traineeships. **The objective of the Recommendation to ensure more coherent regulatory approaches across Member States has thus been achieved to a limited degree**, particularly for open market traineeships, as regulatory approaches have not converged since the QFT was adopted. The study has also found that Member States that regulate traineeships via specific legislation are more likely to implement the QFT fully or partially than those the regulate traineeships through general labour law.

Even when national legislation shows high implementation of the QFT, this does not always translate to quality traineeships on the ground. This is linked to the fact that enforcement and monitoring of legislation governing traineeships varies substantially across the EU27 and can be significantly strengthened. Monitoring and enforcement mechanisms exist for both types of traineeships in all Member States; however, they remain more common for ALMP traineeships than for open market traineeships and, **even where they do exist ‘on paper’, our evidence indicates that they have limited impact on ensuring application of the legal framework.** The study shows that this limited impact is mainly due to both the absence of specific legislation on traineeships, and a lack of capacity of labour inspectorates and/or PES to carry out controls and checks.

It is not possible to ascertain the impact of the implementation of the QFT itself on trainees due the multiple factors which influence trainees’ experiences and outcomes. However, evidence shows that **there have been improvements in the quality of traineeships since 2014 and that quality traineeships as a whole do have a positive impact on young people in terms of facilitating a stable labour market integration** and contributing to youth employment. Positive outcomes of quality traineeships identified in the study research include increased employability in terms of relevant skills, access to professional networks and general development, increased access to the labour market and higher starting salaries. The principles of the QFT that are most impactful on young people’s labour market integration are those outlining the need to determine learning and educational objectives of the traineeship and the written agreement.

In terms of how the effects of the QFT, through better quality traineeships, are distributed within different subgroups and sectors in Member States, the study found evidence of **inequalities in terms of access to opportunities to undertake traineeships**. Young people from rural areas, from a lower socio-economic background and with lower educational attainment were identified as groups that may be less able to undertake traineeships if they are unpaid and/or if they do not have specific tailored measures to address their needs. Stakeholders consulted for the study had limited knowledge of sectoral differences in the quality of traineeships in their countries, citing the lack of monitoring/data on traineeship prevalence as the main reason for this. Nonetheless some **recurring sectors emerged from the study as being more prone to low quality traineeships**, including arts, entertainment and recreation and health and social work and education. Furthermore, sectors with a larger share of small enterprises were more likely to not apply the principles of the QFT in their traineeships as they face challenges linked to limited human and financial capacity to handle the administrative burden – or the perceived administrative burden – of ensuring quality traineeships.

While there are several similarities (e.g., addressing some common dimensions), there are also **key differences between the EFQEA and the QFT** (e.g., more direct recommendations in the EFQEA, additional elements). Even taking into account the different nature of apprenticeships and traineeships, the research indicates that the EFQEA has had a greater degree of effectiveness than the QFT. Key factors contributing to this are: the more collaborative institutional and stakeholder context of the EFQEA; the clearer scope of both the EFQEA and of apprenticeships in general; the higher degree of regulation of apprenticeships meaning that implementation has more support from labour law and collective agreements; the support for the implementation of the EFQEA from the European Alliance for Apprenticeships (EAfA) and the Apprenticeship Support Services; and the more direct, concrete and specific recommendations of the EFQEA.

Efficiency

Key findings on efficiency

Analysis of the efficiency of the QFT is hampered by a lack of quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. The research attempted to assess the scale of costs and benefits through several elements of the study: Task 1 (targeted consultations), Task 2 (mapping), and Task 3 (case studies). The case studies provided the opportunity for more in-depth analysis of costs and benefits of the implementation of the Recommendation in selected Member States, using both qualitative and quantitative data where available. Most of these elements of the methodology were able to address the question of costs and benefits only via the perceptions of stakeholders, and in most cases such perceptions yielded only qualitative assessments of efficiency. Where quantitative assessments were provided and relevant, these have been fully used in the analysis.

Analysis of the efficiency of the QFT is hampered by a lack of quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. In most cases only qualitative assessments of efficiency have been available. Where quantitative data was available and relevant, it has been fully used in the analysis of efficiency alongside this qualitative data.

As far as **benefits** are concerned, the study shows that **young people** have seen signs of improvements in the quality of traineeships through trainees being less exploited and gaining learning and skills which increase their chances of entering work. For **employers**, key benefits of applying QFT principles are: they enhance employer understanding of traineeship quality; they enhance employer reputation and increase their attractiveness to young workers; they allow employers to provide young workers with work experience, without paying a full wage, while investing in those individuals; and they enable employers to effectively ‘try out’ workers. There are also **benefits to society** from reduced unemployment and improved school-to-work transition.

Looking at **costs**, **employers** reported adjustment costs linked to supervising trainees, assessing and certifying trainees' skills, and developing training plans. In cases where these costs are subsidised or reimbursed, applying for and managing the subsidies itself involves administrative costs, especially for small companies. The dominant view was that **QFT-related costs for employers were small, overall**. However, costs are likely to be more significant for small organisations with fewer resources to devote to understanding traineeship requirements and supervising trainees; and higher for open market traineeships than for ALMP traineeships given that the latter offer many more financial instruments and financial support for employers, limiting the costs they must bear.

For **national authorities**, implementation of the QFT was mainly centred on enforcement costs, including direct labour costs associated with designing programmes, implementing new legislation, and investing in public services and labour inspectorates to monitor compliance; while ongoing costs include the costs of subsidies and grants to support traineeships.

The **obstacles** to employers of offering traineeships centre around regulatory and administrative complexities in offering traineeships. Employers highlighted the complexity of existing legal frameworks on open market traineeships, and administrative challenges of managing cooperation with PES and financial incentives (for ALMP traineeships). Challenges around a lack of capacity to apply the learning elements to the traineeship were also cited as common obstacles across both types of traineeships.

Nevertheless, overall, the evidence indicates that the **administrative burden of QFT implementation is generally proportionate to the benefits**. A key reason is that total costs associated with the QFT are low whereas benefits, especially potential future benefits, are potentially large. The proportionality of costs to benefits, and therefore efficiency, do however vary with several factors:

- Efficiency is achieved only if the QFT promotes higher quality traineeships.
- QFT implementation is less efficient for small and micro-organisations than for large firms
- Efficiency is greater if employers are incentivised to offer a job to a young person following a traineeship may increase efficiency

The evidence also implies that it would be difficult to reduce the overall administrative burden associated with QFT without also reducing the scale of the benefits.

Coherence

There is overall a fairly good level of coherence and complementarity between the objectives, target groups and measures to implement the QFT and relevant policies at national and regional level in the fields of education and training, employment, and social policy. However, the degree of coherence varies both across EU countries and by policy field. There is **more evidence of coherence with national and regional measures within the context of ALMPs than with open market traineeships**. Overall, the greatest degree of coherence can be found with national and regional policies in the field of employment, compared to the policy fields of education, training and social policy. Some challenges which could be addressed to improve coherence with relevant national and regional policies include: improved horizontal policy coordination at national/regional level, widening the scope of the QFT, making the QFT more ambitious (i.e., strengthening the principles), and improving links with education and social policies.

The objectives, target groups and measures to implement the QFT, both in the context of ALMPs and open market traineeships, display overall a **good level of coherence with other relevant EU initiatives, funds and programmes**. No evidence of overlap or duplication was found. The QFT is coherent with relevant overarching EU strategies, EU youth policies, EU initiatives on traineeships and apprenticeships, and EU employment policies. It is also coherent with key EU funding mechanisms including the Youth Employment Initiative (YEI), the ESF+, NextGenerationEU and Erasmus+. Our research has nonetheless highlighted ways in which coherence with relevant EU initiatives could be improved, including: increasing the visibility of the QFT, including via awareness-raising and mutual learning; providing more practical guidance about how to implement

the QFT principles; considering whether QFT compliance could be a conditionality for funding (e.g. ESF+); using the QFT as a framework for monitoring and evaluation of traineeships; promoting more links and common messaging with the EFQEA; and developing more synergies with quality measures for traineeships under other EU programmes such as Erasmus+.

How did the EU intervention make a difference?

EU added value

The **QFT has brought added value to a range of stakeholders on the national and regional level in relation to traineeships in many Member States**. However, the extent of the added value varies depending on whether instruments and measures regulating traineeship quality were already in place, and the extent to which traineeship quality has actually improved since the QFT was adopted.

The primary added-value of the **QFT is that it provides an EU-level structure and framework for national authorities and policymakers to guide policy in this area**. The study found that this has been valuable for national and regional authorities as a whole across the EU, but particularly for national authorities of the newer Member States, that have used the QFT as a guiding instrument for new policy formulation where none existed before. The QFT has brought added value as a framework to other national stakeholders, as well, in particular trade unions and youth organisations, that have been able to use it to further their advocacy on ensuring quality traineeships at the national level. Nonetheless, these same stakeholders also highlighted that the **full EU added value of the Recommendation is limited by weak implementation of the QFT on the ground**. This was highlighted in particular by youth organisations and trade unions in Member States where the impact of the QFT on the ground is less evident.

Views on the consequences of discontinuing the QFT at EU level and the prognosis for a no-policy-change scenario fall into two groups. Some stakeholders – particularly national authorities from Member States where traineeships have been covered in the legal framework since before the QFT came into being – consider that **discontinuing the QFT or continuing it as it stands would have no impact** because its principles are embedded into national legislation. The majority of views, however, indicate clearly that that **QFT should remain in place** with stakeholders identifying a **potential negative impact if the QFT was discontinued**, primarily in the loss of guidance and impetus for the development of national policies on traineeships. There were also a range of stakeholders that called for **strengthening the current QFT** in various ways. These included introducing supporting actions such as mutual learning and exchange or more substantial changes including additional principles to increase its added value.

Is the intervention still relevant?

Relevance

Key findings

The study shows that the **QFT is highly relevant to fostering the labour market integration of young people**, with the provision of a written agreement and the focus on the learning objectives of the traineeship standing out as the most relevant principles to achieve positive post-traineeship outcomes.

The **QFT overall remains relevant** as issues such as substandard traineeships and complex legal frameworks persist. The impact of the pandemic on the labour market has also **increased the relevance of the QFT** whilst bringing about a need to consider adjustments to the QFT to ensure it remains relevant in the context of the increasingly central role of remote working and digital skills.

Views on the relevance of the **non-binding nature of the QFT are more mixed and tend to align along stakeholder groups**. Trade unions and youth organisations generally find that the non-binding nature of the QFT is not relevant for achieving its objectives as it has allowed for different regulatory approaches at the national level to continue, resulting in differing levels of protections granted to trainees. National authorities and employer organisations consulted highlight instead that the QFT's non-binding nature is highly relevant as it takes into account the diversity of national education and training and labour market environments and strikes a balance between the need to ensure minimum standards and preserve a degree of flexibility.

The evidence from the study is also mixed on whether additional principles on remuneration and access to social protection for trainees would increase the relevance of the QFT. Views align along stakeholder groups, with trade unions and youth organisations consulted throughout the study calling strongly for increasing the relevance of the QFT in fostering labour market integration through principles on remuneration and social protection access. On the other hand, employer representatives consulted during the study express reservations on the relevance of such principles, highlighting that trainees should not be defined as workers, and that offering them the same remuneration and social protection access as regular workers would take away from the main purpose of traineeships to provide a learning opportunity. Whilst further research on the impacts of such an additional principle are needed, it is clear that the **potentially positive impact of remuneration and social protection access should be assessed against potentially adverse consequences**. These include increased costs for traineeships, which could, in turn, result in a reduced offer in terms of traineeship opportunities, and a more competitive labour market for youth.

4.5. Lessons learnt

Based on the findings from the study, we set out below some initial lessons learnt for the future, structured by category.

Scope of traineeships covered by the QFT

- **The QFT, and any future quality standards for traineeships, should define in more detail the scope of traineeships which are covered to ensure greater clarity for all stakeholders.** The term “traineeship” refers to a very diverse range of realities in most Member States, ranging from very short (e.g., 1-2 weeks) work experience placements for pupils in compulsory education to much longer (e.g., 6 months) and more structured learning experiences.
- **On balance, the research indicates that the current scope of the QFT – covering ALMP traineeships and OMTs – is fit for purpose.** Traineeships that are part of educational curricula already generally have clear quality criteria, including clear learning outcomes, and are governed and monitored by different processes. There could however potentially be benefit in **exploring cooperation on quality standards for traineeships funded by EU programmes**, for example Erasmus+ traineeships, which could strengthen and expand awareness of the QFT.

Content of the QFT, including QFT principles

- **The formulation of recommendations and principles in the current QFT could be more direct to increase their effectiveness and implementation**, especially on core principles (e.g., establishing learning outcomes). Instead of referring for example to “encouraging” stakeholders to apply principles, formulations should be more forthright e.g., “should” or “require”. More direct formulations should be possible without compromising the necessary degree of flexibility to ensure employer provision of traineeships.
- **Additional principles ensuring the remuneration of trainees and their access to social protection should be considered.** This would support in making traineeships a more accessible opportunity for all young people, helping to overcome inequalities which have been heightened due to the Covid-19 pandemic. It would also address the concerns of key stakeholder groups – in particular young people themselves and their representatives – with the QFT, which continue to be centred around the potential exploitation of trainees.
- However, in order to respect the concerns of other key stakeholders - in particular employer representatives – and ensure that traineeships remain an attractive option to employers, it will be crucial that **there is ongoing constructive dialogue with employers about the level of remuneration set, and a degree of flexibility built into trainee remuneration** (e.g., not indexed to the level of unemployment benefits).
- **There is a need to integrate a much greater and more explicit equality perspective into the design and implementation of the QFT** to ensure that it provides quality traineeships for young people from all backgrounds. The needs of individuals who face multiple and intersectional disadvantage (e.g., migrant background and low socio-economic status) should be proactively taken into account through specific provisions in national legislation, e.g., provisions which allow for a longer traineeship duration when the trainee has a disability, and improved outreach and support. Practical guidance and tools could be developed alongside legislation and quality frameworks to support traineeship providers in achieving this goal and accessing the talents of – and providing opportunities for – all young people.
- **Future quality frameworks for traineeships need to clearly address recent and emerging trends which are having already a major impact – and have the potential to have an even greater impact - on the nature of traineeships and the workplace in**

general. These include the impact of the Covid-19 pandemic, the new forms of working (e.g., distance working), learning (e.g., distance and blended learning) and employment (e.g., platform work, homeworking), as well as the digital and green transitions. Employer organisations however have reservations about including specific mention of hybrid or remote traineeships, which have reduced in prevalence since the pandemic, and which they consider as having an inherently greater risk in terms of quality both for trainees and employers.

- Where possible, **greater harmonisation between the quality criteria in the EFQEA and the QFT** could mutually reinforce both quality frameworks. While it is clear that apprenticeships and traineeships have key differences – including goals, learning content, structure and governance – there are also clear linkages between them as two key elements of the offer of work-based learning for young (and increasingly also older) people to facilitate their transition into employment. As such, there are core principles and fundamentals which should be common to both forms of learning to ensure that the rights of young people are protected, and that traineeships and apprenticeships are both a good investment of public funding and beneficial to employers. Despite their very different status in many EU Member States, creating **better linkages between traineeships and apprenticeships both at policy and implementation level** could provide benefits for both young people and employers and increase the quality standards of both.

Boosting implementation at national/regional level

- **The study clearly shows that particular attention needs to be paid overall to implementation on the ground of the QFT principles**, which is lagging behind implementation of the QFT in national legislation/frameworks.
- Given current skills mismatches, **ensuring more links with the skills needs of local labour markets could be considered to increase the quality and relevance of traineeships** particularly as it is a win-win for both traineeship providers and trainees. Traineeship providers could map their own skills needs and assess trainees' competencies before/after the traineeships (e.g., through pre and post skills assessment) whilst national authorities could develop more coherent and impactful approaches to recognition and certification of traineeships in cooperation with employers. Greater support and guidance for employers (e.g., through training), in particular small and medium sized enterprises (SMEs), to be able to carry out skills assessments and provide adequate supervision would be key in these processes.
- **More tailoring of provision, outreach and targeted support for employers and young people** would contribute to allowing young people in all their diversity (gender, education level, migrant/minority background, urban/rural, low/high socioeconomic status (SES), etc.) to have access to quality traineeships.
- **There should be more awareness-raising and training for employers**, including SMEs, about the benefits of traineeships, including addressing skills shortages, how quality traineeship schemes can be developed, and the funding available to support the costs involved.
- The study has found that there are still obstacles to cross-border traineeships, in part because regulatory approaches to open market traineeships have not converged since the QFT was adopted. In order to increase the offer and take-up of cross-border traineeships in the context of diverse regulatory systems, **clear guidance to traineeship providers on the regulations in place in different countries and how to hire trainees from other countries** would be beneficial.

Enforcement, monitoring and evaluation of traineeships and QFT implementation

- **There is a need for more comparable EU wide data on traineeships and trainees in general**, as this lack of data currently hampers the monitoring of their evolution and of the impact of the QFT. Incorporating traineeships into EU wide data collection processes, such as in the European Labour Force Survey (ELFS) could be explored to provide a more robust ongoing evidence base for assessing the prevalence and evolution of traineeships, and monitoring QFT implementation. **There is a particular lack of EU-wide (and national) data in relation to both open market and cross-border traineeships**. It would be very important to establish data collection mechanisms which allow better monitoring of these types of traineeships.
- **Reinforcement of monitoring and enforcement mechanisms at national and regional level would have a positive impact on compliance with quality standards in traineeships**. There is a particular dearth of enforcement and monitoring of the quality of open market traineeships. Ensuring that labour market inspectorates are aware of regulation in place on traineeships (through training and information campaigns) and can enforce it (through capacity building and adequate funding) should be strongly considered.

Cooperation and mutual learning to support QFT implementation

- **Further mechanisms could be implemented at EU level to bring key national stakeholders together to oversee, monitor and seek to overcome obstacles to the successful implementation on the ground of the QFT**. This could be a specific committee or forum, or a greater focus within existing EU level structures (e.g., EMCO). Any such mechanisms should seek to find constructive and productive focus, away from the traditional dichotomy of views (e.g., around remuneration levels), to ensure quality traineeships which benefit young people, employers and the wider society.
- **The implementation of the QFT could benefit from the support of a network of committed stakeholders across the EU**, as is the case for the support provided by the European Alliance for Apprenticeships (EAfA) for the implementation of the EFQEA. The possibility of opening up the EAfA to also cover traineeships could potentially also be considered.
- **More EU level mutual learning, including sharing of examples of good practice around developing and implementing quality traineeships, could help inspire both national policymakers and other key stakeholders**, which in turn could increase compliance and improve the provision of quality traineeships. Providing communication and information on the benefits of quality traineeships for young people, employers and wider society could also support implementation and take-up at both EU and national level.
- **Increased cooperation between all key stakeholders involved in traineeships at national, regional and also local level** can also play a key role in improving monitoring and supporting implementation. The voice of trainees should be actively sought, as well as the involvement of NGOs and bodies representing young people.

Funding to support the implementation of quality traineeships and the QFT

- **More signposting should be provided for national and regional stakeholders on the EU funds available to support the implementation of quality traineeships**. A wide variety of EU and national funds are available to support the implementation and upscaling of quality traineeship by national and regional authorities and employers, which could be used more effectively and strategically by targeted communication. Funding should be targeted to support employers to provide quality traineeships for all young people.

- **A range of financial incentives can be offered to support employers in the implementation of quality traineeships, which have been shown to be particularly beneficial for small and medium sized enterprises (SMEs).** In order to ensure that traineeships are appealing to employers, and SMEs in particular, and that they are able to cover the additional costs associated with the recommended quality standards (e.g., tutors, written agreements), it will be important to continue to reflect on the package of support measures, including financial support, which can be provided.

Further research

- **Further research should be carried out on the obstacles to employers to offering quality traineeships,** as well as the barriers preventing young people from taking up traineeships. Defining the obstacles more clearly would allow more informed policy reflections on solutions.
- **Differences in the rights and conditions of traineeships across different sectors should be further explored and addressed to ensure equity for all trainees,** and counter potential gender-related impacts of weaker rights in sectors which may be dominated by men, or more commonly, women.
- **Research on the impact of the Covid-19 pandemic on the quality of traineeships and the evolution of means of traineeships** (e.g., digital traineeships) would allow better tailoring of future quality standards and adaptation to needs both currently and in the future.

Annexes

Annex 1: Study methodology

Annex 2: Additional evidence on degree of implementation of the QFT

Annex 3: Case studies

Annex 4: Consultation synopsis report

Annex 5: Report from the expert meeting

Annex 6: Report from the validation workshop

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Annex 1: Study methodology

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1. Introduction

This document provides the detailed methodology and analytical models used for the study supporting the evaluation of the Quality Framework for Traineeships (QFT). The evaluation study itself is presented in full in the main report, to which this document is annexed.

2. Approach to the evaluation and analytical models

Our evaluation was based on a theory-based evaluation approach using mixed-method data collection approaches, combining qualitative and quantitative research methods within an overall analytical approach guided by a comprehensive evaluation framework. The objectives and purpose of the study, along with the key issues it focused on, indicated the necessity of an approach able to explore processes linked to the implementation of the Quality Framework for Traineeships, as well as their effects and outcomes. Below we set out the theoretical and analytical approach that we have developed to meet these needs.

2.1. Articulation of the intervention logic

During the inception phase, we further developed the intervention logic that we articulated in our original tender. Specifically, the intervention logic set out a high-level understanding of the rationale, inputs, activities, outputs, results and impacts of the QFT and provided a framework for a standardised approach to the evaluation whilst allowing for flexibility to explore the individual provisions called for in the QFT. The intervention logic provides an articulation of activities, outputs, outcomes and impacts alongside paying greater attention to the causal links between them. This latter aspect is central to our analytical approach to the study particularly in terms of providing the basis to fully test the intervention logic and explore causality to determine the extent to which the QFT led to, and is responsible for, the outcomes and impacts anticipated.

2.2. Assessing process and outcomes

Using the intervention logics as an analytical basis for the evaluation, combined with the evaluation criteria specified in the tender specifications, provided an important underpinning to the required consideration of process-related themes as well as those more concerned with outcomes.

Exploration of processes linked to the earlier parts of the intervention logic, for example in exploring the degree to which inputs supported the implementation of principles of the QFT in national legislation. Assessment of outcomes and impacts focused on the later stages of the intervention logic, exploring how and the extent to which the actions undertaken through the implementation of the QFT led to the intended immediate outputs, longer term results, and broader impacts articulated in the model.

The different methodological approaches including secondary data analysis (Task 2 – Mapping), the consultation activities (Task 1 – Targeted consultations and Task 4 – Public consultation support) and the case studies (Task 3) provided a range of evidence that was triangulated to assess the degree to which process and outcome causal chains detailed in the intervention logic are supported.

However, as far as possible, this analytical approach needed to be complemented by an assessment of causality – i.e., the degree to which the activities implemented in response to the QFT have in

reality led to the immediate and longer-term results they intend to generate. A range of other factors (external to the QFT) have influenced the results and impacts of the implementation of the QFT, including the economic context (e.g., levels of youth (un)employment, demand for skilled labour), and other factors, such as the Covid-19 pandemic.

We thus also adopted a contribution analysis approach. We operationalised the contribution analysis approach through collating and assessing, in a structured way, the range of evidence gathered from the range of methodologies deployed for the key evaluation Tasks. Contribution analysis aims to build a credible 'performance story', drawing upon the available sources of evidence to consider the extent to which the QFT, alongside other factors, contributed towards the observed outcomes. Situated within a wider theory-based evaluation approach, this is ideal for the evaluation, as it provides a way of explicitly defining and assessing the causal relationships and mechanisms within the intervention logic.

2.3. Modelling and assessing costs and benefits

As reflected in the evaluation questions relating to efficiency set out in the technical specifications, it was essential that the study ensured the collection and analysis of available data on costs and benefits of the actions associated with the implementation of the QFT. This data was captured to the extent possible through the research tools developed for the different data collection tasks: Task 2 (mapping), Task 1 (targeted consultations) and Task 3 (case studies). The case studies provided the opportunity for more in-depth analysis of costs and benefits of the implementation of the Recommendation in selected Member States, using both qualitative and quantitative data where available.

Conceptually and practically, it is extremely difficult to reliably assess the potential benefits and costs associated with QFT implementation in Member States, for several reasons:

- Benefits/costs that actors (employers, trainees, authorities) are typically aware of are those of introducing and implementing traineeships per se, rather than any additional or different benefits/costs due to adapting traineeships to QFT principles. Many stakeholders reported that costs and benefits associated with the QFT overlap with those of traineeships in general and the QFT has not led to the emergence of new types of costs or benefits. This is despite clear briefings and support from the researchers in the team outlining which principles are relevant to the QFT and which costs.
- Awareness of QFT among relevant actors is low. Thus, even where benefits/costs can be identified, actors are unlikely to attribute them appropriately to the QFT. This is particularly true in countries, where the traineeship concept is long-established, and no concrete changes have been associated with the QFT.
- Member States had traineeships in place prior to the QFT, often closely resembling what is called for in the QFT. Even where specific traineeship developments are in line with the QFT Recommendation, most stakeholders noted that they have not monitored their effect. Hence it is not usually possible to identify which, if any, elements of these developments and their benefits/costs would occur anyway, and which can be attributed to the QFT.
- Moreover, even where the QFT has impacted on the trainee landscape, and specific developments can be accurately attributed to the QFT, their often qualitative nature (e.g., improved clarity of contractual terms, educational objectives, rights and obligations) makes it very difficult for actors to quantify associated benefits/costs. The best that can be achieved in most cases is that they can name the benefits/costs and perhaps give some qualitative assessment of their importance.

It is clear that a robust estimate of benefits/costs associated with QFT implementation requires a study with a different methodology than that used for this study. Specifically, it would require (representative) quantitative data collected from the relevant actors, with a counterfactual aspect (e.g., a 'before and after' study of QFT implementation over time).

Despite the challenges, we have gathered evidence from the stakeholder consultations, trainee survey and case-studies which, taken together, provide some picture of benefits and costs, largely qualitative in nature (where quantitative evidence was provided that is also presented). We also made further efforts in the final phase of the study to gather more quantitative evidence which are detailed in section 3.7 of this Annex.

When considering benefits and costs, we use the typology from Tool 56 of The Better Regulation Toolbox. Of course, this is designed mainly for assessing the implementation of policy initiatives and (enforceable) legal regulations, and many categories in the typology are of limited relevance in the context of a non-binding Recommendation, such as the QFT. It is, nevertheless, helpful to use the Toolbox categories in presenting the (limited) evidence on benefits and costs, distinguishing in particular between:

- Direct benefits and indirect benefits;
- Direct costs, enforcement costs and indirect costs

2.4. Evaluation framework

Drawing together our thinking in designing the initial intervention logic and approach to the evaluation, we developed an overarching evaluation framework which guided the evaluation. It firstly outlines the evaluation criteria and data sources, before summarising our evaluation framework (included in [Appendix 1](#)).

2.5. Evaluation criteria

The study has complied with the requirements for evaluation set out in the Better Regulation Guidelines and Toolbox. This includes assessing the implementation of the QFT against the five key evaluation criteria of relevance, effectiveness, efficiency, coherence and EU added value. An overview of these criteria in the context of this evaluation are set out in Table 1 below. The evaluation framework is included in [Appendix 1](#).

Table 1. Overview of evaluation criteria

Evaluation criteria	Overview of key issues
Effectiveness	The study's assessment of effectiveness has been multi-faceted, covering the extent to which the principles of the QFT were effectively implemented (i.e., to meet objectives and expected results), but also how they were implemented and for which sub-groups and sectors they have been most/least beneficial. As per the evaluation questions in the tender specifications, our analysis has examined the extent to which the QFT principles have been enshrined in and/or influenced national legislation/quality frameworks since 2014, the scope of such national provisions, as well as considering whether they already existed. In parallel, we have explored the existence and effectiveness of enforcement and/or monitoring mechanisms in ensuring adherence to the QFT/national frameworks, considering also any potential adverse effects. In addition, the study has explored the impact of QFT implementation on trainees, including their perceptions about the effectiveness of EU and/or national provisions to support quality traineeships in fostering sustainable labour market

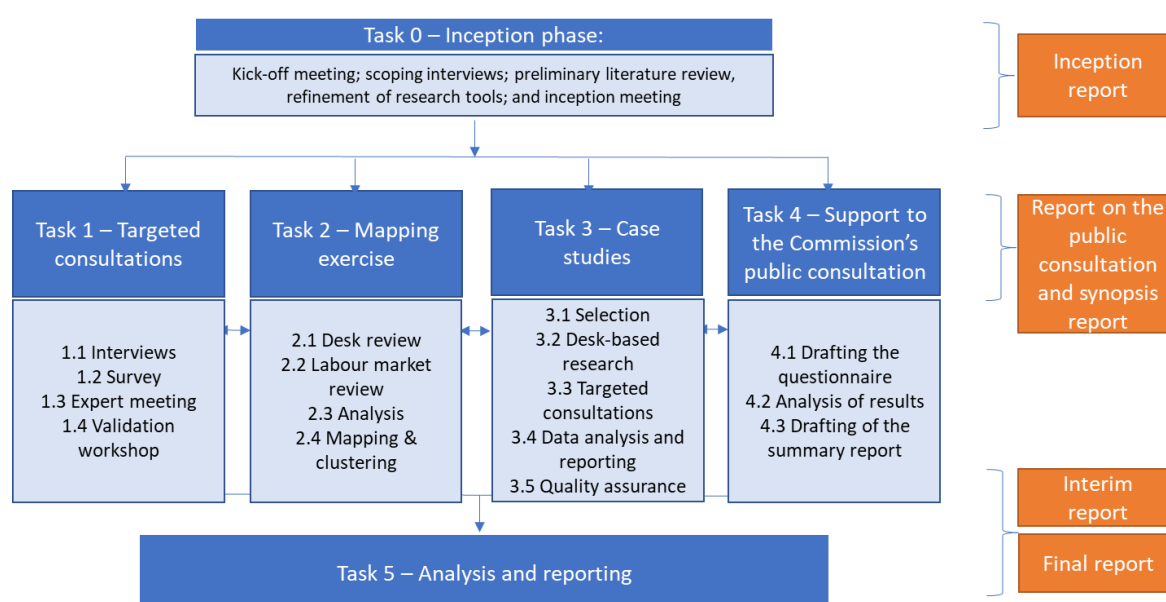
Evaluation criteria	Overview of key issues
	<p>integration and tackling youth unemployment, and considering again any potential adverse effects. Our consideration of effectiveness has also compared the effectiveness of the implementation of the QFT principles for different sub-groups and sectors within Member States where data has allowed. Finally, our study has compared the effectiveness of the implementation of the QFT with that of the EFQEA, taking into account the differences in objectives and target groups. Evidence generated under all study tasks has contributed to the examination of the QFT's effectiveness.</p>
Efficiency	<p>The study's examination of efficiency has explored the degree to which the objectives of the QFT have been achieved at optimal cost for different relevant stakeholders, and the factors which have contributed to this, including a consideration of the use of different sources of EU and national funding. Addressing the efficiency criterion (as outlined in section 2.3) has involved quantitative data as far as possible but has been substantially supported by qualitative data from the case studies, existing (national/regional) evaluation reports and data generated from the study's own targeted and public consultations. The analysis includes an assessment of the administrative burden of the implementation and enforcement of the QFT for different stakeholders and at different levels. It has also examined the extent to which financial incentives have been used by Member States to increase the prevalence of quality traineeships, and whether any such incentives included contribution from relevant EU programmes. We have as far as possible based on data availability identified and carried out an estimation of the benefits – and potential benefits – for young people and explored the existence of any further benefits for wider society. The study also explored the main obstacles preventing employers from offering traineeships, and the type of support which would be necessary to overcome them. Bringing together the results of the different analyses, we have provided an assessment of the degree to which the administrative costs of the implementation of the QFT are proportionate to the identified benefits, as well its overall cost-effectiveness, and an assessment of the factors which influenced efficiency. Finally, the study has explored whether the identified benefits could have been achieved at lower cost, by reducing administrative burden without compromising benefits.</p>
Coherence	<p>Examining coherence implies the need to assess linkages, synergies, complementarities and potential duplication with related EU, national and regional policies, instruments, initiatives, and recommendations (policy and programme coherence). In the context of this study, we have explored the coherence of the objectives, target groups and measures to implement the QFT within ALMP traineeships and open market traineeships with both (a) education, training, employment and social policies, at national and regional level and (b) relevant EU initiatives. In addition, we have examined the extent to which the QFT complements or duplicates other policies, particularly at national level. Evidence to address the coherence criterion has been drawn principally from desk-based analysis of relevant texts, but also from other sources, notably the detailed Member State level case studies, as appropriate.</p>
EU added value	<p>As specified in the Better Regulations Toolbox (tool #47), assessing EU added value involves looking for changes which can reasonably be argued are due to the EU intervention, over and above what could have been expected from national actions by the Member States. Building on the evidence gathered and analysis carried out to assess the other criteria, the study team has assessed the added value of the QFT compared to what could reasonably have been expected by Member States acting solely at national and/or regional levels. We have also examined the likely consequences of both (a) discontinuing the QFT at EU level and (b) continuing the QFT as it stands (no policy change scenario).</p>

Evaluation criteria	Overview of key issues
	Detailed evidence from the case studies have been key for assessing the added value at national level, alongside evidence available from results of the public and targeted consultations, as well as the mapping exercise.
Relevance	Assessment under this criterion has focused on examining the relevance of the QFT in relation to needs at several levels and from several perspectives. Firstly, we have assessed the degree to which the QFT principles are appropriate for fostering sustainable labour market integration, and which of the principles are most and least relevant in this regard. Secondly, the study has explored the degree to which the QFT principles are still relevant to the main needs within the EU, taking into account a range of developments including the evolution of the concept of quality in traineeships over time, the impacts of the Covid-19 pandemic, the changing labour market and the current perspectives of key stakeholders. Thirdly, our assessment has considered whether any further dimensions were missing in the principles, and the likely impact of their inclusion on the quality of traineeships and their contribution to stable integration into the labour market. Finally, the study has examined the degree to which the status of the QFT as a non-binding Council Recommendation corresponded and continues to correspond to the needs and issues which it seeks to address. Evidence to assess relevance has been gathered through all study tasks, with a particular focus within the targeted consultation, mapping and case study tasks.

3. Detailed methodology

In this section, we set out in detail the methodological approach used in undertaking the evaluation. We begin with an overview of our methodology, followed by a detailed presentation of the methods and tools implemented for each Task. The figure below provides an overview of our study methodology, including the main deliverables.

Figure 1. Overview of the study methodology



3.1. Task 0 Inception phase

3.1.1. Preliminary literature review

During the inception phase, we built on the review of relevant documentation carried out for the tender to undertake a wider preliminary literature review on the Quality Framework for Traineeships. This has laid the foundations for the subsequent Tasks of the study, with the following specific purposes:

- To gather further evidence to substantiate the evaluation questions and support in finetuning the evaluation framework;
- To become more familiar with data sources which will be used in the mapping of the state of play of implementation of the QFT against the point of comparison in 2014;
- To gather any further data from DG EMPL that is not in the public domain and that will aid the research, in particular the mapping task;
- To support the final selection of the case study countries;
- To fine-tune the research tools, including the interview topic guides (Task 1.1), the survey trainees (Task 1.2), and the open public consultation questionnaire (Task 4);
- To identify further potential consultees for the targeted consultations.

We reviewed over 100 documents in this step of the inception phase. This includes the 44 documents in the initial list presented in our tender as well as additional sources identified thorough desk research and recommended by the Commission, the scoping interviews and consultations with our High-level Advisors, and subsequent exchanges (including sources which are not in the public domain). Documents reviewed were selected based on the following criteria:

- **Year:** We considered sources from the years of the financial and economic crisis (2008/2009) in order to understand the context of the QFT, up to documents issued in 2022. However, we prioritised documents that were issued from 2013 onwards. Resources with information for the year 2014 were considered baseline references.
- **Content:** Resources with content mentioning or relevant to traineeships were prioritised. However, since similarities between the notions of “internship”, “traineeship”, “practice”, “vocational training”, “apprenticeship” exist and as terms are often used interchangeably, all these terms were used to assess the relevance of the resources. Furthermore, resources that more broadly addressed the topic of youth employment, precarious work for young people and NEETs were also included.
- **Issuer:** Key authors included were the European Commission. European Commission agencies (Eurofound) organisations, networks and expert groups on the topic of youth, employment and education and training (PES network, European Youth Forum), international organisations (ILO, OECD) and national authorities from Member States.

Once a document met the selection criteria, it was assessed across the following analytical specifications and inputted into our specifically designed literature review tool to allow for systematic collection and organisation of relevant information:

- Short description of the resource, summarising in particular the content relevant to traineeships
- Information on whether the document refers to ALMPs traineeships or open labour market traineeships, or both including any information on strategic policies and significant measures in place in Member States by the end of 2021.
- Information on whether the document includes information on the legal framework for traineeships, on traineeship prevalence, on characteristics of trainees (e.g., age, background, educational level etc.) on the quality of traineeships and on outputs/results, including factors which may have a causal link to the QFT.
- Finally, the overall relevance of the document to the objectives of the study was rated across a scale of low-medium-high while considering both selection criteria and the three analytical specifications.

The overview of relevant resources served as a living document throughout the study and was shared with national experts as a starting point for their research. 'High' relevance sources were used as a key input into the mapping task.

3.1.2. Scoping interviews

We conducted two scoping interviews in the inception phase as well as two consultation meetings with our High-level Advisors. We interviewed Pirkko Pyorala, Unit B1, DG EMPL who shared insights on the expectations and context of the study and Tamas Varnai, Unit E3, DG EMPL, who shared insights on the political and socio-economic context around the time of the adoption of the QFT, the stakeholders involved in discussions and the evolution of the Recommendation in its early stages. These interviews helped us better understand the context of the QFT and expected impacts at the time of its adoption, the positions of stakeholders over time, as well as the broader purpose of the study.

We also held two consultation meetings during the inception phase with our High-level Advisors Lukasz Sienkiewicz, Elvira Gonzalez Gago, Andrew McCoshan and our senior economist Nigel Meager. The first allowed us to consult them on the methodology in general, and to gather their feedback on the research tools for the interviews and the survey of trainees. Their views were taken on board in finetuning the research tools. The second meeting was focused on two aspects in particular as follows:

- The mapping task (Task 2). The analytical and assessment frameworks for the mapping were revised according to these discussions.
- How to determine an appropriate estimate for traineeship prevalence using existing comparable, EU-wide data. (see section 3.1.3)

3.1.3. Estimation of prevalence of traineeships

Comparable EU-wide statistical data on the prevalence of open market traineeships does not exist, which could be linked to the fact that regulatory approaches to traineeships in Member States vary, entailing different categorisations, rights and obligations. As part of the estimation of the prevalence of traineeships in the EU27 for the study, a scoping activity was undertaken to assess the advantages and disadvantages of different ways of estimating traineeship prevalence. The scoping activity focused on Eurostat databases due to their geographical completeness in the area of employment, unemployment, and education. These included indicators on the number of young temporary employees ([yth_empl_050]; a one-off indicator collected in 2016 on Population by sex, age,

educational attainment level and work experience while studying from 2016 [LFSO_16WORKEXP] and the TEMPREAS labour force survey variable. Serious caveats were identified for each of these proxies. As a result, we selected the same approach as the proxy used in the 2012 analytical document: the number of students enrolled in tertiary education¹ multiplied by the activity rate².

- **Rationale:** Based on the study findings, the majority of trainees either are in the process of attaining or have attained tertiary education qualifications. We can then estimate the number of students that may do a traineeship by using the number of students in tertiary education multiplied by the activity rate for that age group (i.e., *If there are 100,000 enrolled students in tertiary education and activity rate is 70%, we can assume that 70,000 of them would go on to do a traineeship*). Using data on the number of people aged 20-34 in Member State, the number of estimated number of traineeships can be expressed as a percentage share of the number of 20–34 year-olds to allow for comparison between Member States³.
- **Advantages:** Data is largely available for EU27 and for the evaluation period. This variable corresponds well with the study preliminary findings (graduates from 20 to 29 years undertaking traineeships) and is straightforward to calculate.
- **Caveats** The main methodological limitation of this proxy is the fact that not all young people who undertake open market traineeships have a tertiary education meaning that the proxy does not capture traineeships of those with lower qualifications.

In contrast to the 2012 analysis, however, we used the activity rate for *each* Member State and for the *specific age group* of 20-29 years old, whereas the 2012 estimate used an EU average *assumed* activity rate of 80%. In calculating the EU average, we also discounted Member States that do not offer open market traineeships (as outlined in section 3.2) in order to give a more accurate estimate than the 2012 analytical document which included all Member States by using EU average data.

This calculation was completed for the years 2014-2020; for clarity of presentation and given the period of time which the evaluation covers, we chose to display the timepoints in 2014 and 2020, and the evolution over that period. The number of young people estimated to be undertaking a traineeship was then calculated as a share of the total youth population⁴.

The results of the estimation of prevalence are presented in **Section 3.1** in the final report.

3.2. Task 1 Targeted consultations

The aim of Task 1 was to undertake a set of interlinked targeted consultation activities to help gather the views and opinions of a wide range of relevant stakeholders. This is based principally on the consultation strategy for the study which is presented in **Appendix 2**.

3.2.1. Task 1.1 Interview programme

The interview programme provided us with one of the main sources of qualitative data for the study. The findings of the interviews were included in the triangulation of data to provide answers to all the

¹ Data on the number of students enrolled in tertiary education[educ_uoe_enrt01] was sourced from:

https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=educ_uoe_enrt01&lang=en

² Data on the activity rate [tepsr_wc160] was sourced from:

https://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=tepsr_wc160&lang=en

³ The choice to present the results as a percentage of the youth population is so that you can compare trends more easily between MS, as requested by the ISSG at the interim meeting. Comparing the raw numbers between countries is not very useful when they have such different population sizes e.g one MS might have a much higher number of traineeships compared to another MS, but this may be because they just have a higher population. Presenting the number as a share of the population allows you to make better comparisons between countries.

⁴ Data on the number of people aged 20-34 [DEMO_R_PJANGROUP] was sourced from:

https://ec.europa.eu/eurostat/databrowser/view/DEMO_R_PJANGROUP_custom_2807666/default/table?lang=en

evaluation questions relating to the effectiveness, efficiency, relevance, coherence and EU added value of the QFT. Specifically, the interviews helped to examine:

- National approaches to quality frameworks and legislation for traineeships, following the principles of the QFT;
- The impact of implementation of the QFT on the quality of traineeships, as well as on trainees, including any adverse effects, and on youth employment;
- The QFT's relevance to socio-economic policy needs in the EU, and coherence with other EU and national/regional policies and initiatives on youth employment, education and training, and social policies;
- The costs and benefits associated with the implementation of the QFT for the main stakeholders involved
- The QFT's EU added value, and any future needs for EU level support.

Our interview programme also informed several other tasks of the study. It provided input to the mapping undertaken in Task 2 by supplementing the evidence acquired through the desk review of qualitative and quantitative data on the EU and national levels (Task 2.1) and the labour market review of traineeship offers (Task 2.2). The interviews also informed preparations for Task 1.3 (ex-ante online expert meeting), by helping identify relevant participants and providing insights for the preparation of the concept note and background paper. Lastly, the interview programme provided a source of evidence for the selection of and drafting of the case studies (Task 3)

Following the submission of the inception report, the research team compiled a list of prospective stakeholders to be interviewed as part of this study, at EU and national level. The interview programme focused on two key groups of stakeholders:

- **Main national stakeholders in charge of designing, implementing, monitoring, or ensuring compliance with legislative and/or quality frameworks in each Member State:** e.g., (sub)-national authorities, public employment services, social partners, education and training providers. This also includes relevant stakeholders such as youth organisations and other organisations representing trainees.
- **Relevant EU level stakeholders involved in youth employment policies and funding, with a focus on traineeships.** This group included EU institutions, social partners, civil society organisations and other relevant organisations.

We undertook a total of 124 interviews. Of these, 18 were conducted with EU-level stakeholders (including two scoping interviews) as outlined in the table below.

Table 2. Overview of EU level stakeholder interviews

Organisation	Category
EUROCHAMBERS	EU level social partners
SPRINT project	EU-level organisations representing young trainees/young people/workers' rights
Eurofound	Research and academia
Interns Go Pro	EU-level organisations representing young trainees/young people/workers' rights

ETUC	EU level social partners
ILO	Research and academia
CESI Youth	EU level social partners
European Youth Forum	EU-level organisations representing young trainees/young people/workers' rights
Eurofound	Research and academia
Fair Internship Initiative	EU-level organisations representing young trainees/young people/workers' rights
BussinesEurope	EU level social partners
CEDEFOP	EU level institutions and policymakers
DG EAC	EU level institutions and policymakers
IndustrialAll European Trade Union	EU-level organisations representing young trainees/young people/workers' rights
MEP Semedo's office	European Parliament MEP
DG EMPL, Directorate B	EU level institutions and policymakers
DG EMPL, Unit B1	EU level institutions and policymakers
DG EMPL, Unit B3	EU level institutions and policymakers

Source: Ecorys 2022

107 national-level interviews were conducted. National experts were asked to conduct up to five interviews per Member States. The following interviews were undertaken:

Table 3. Interviews conducted on the national level

National level		
Type of stakeholder	Countries covered	Number of interviews conducted
National and regional ministries and government bodies responsible for employment or education policies	AT, BE, BG, CY, CZ, DE, DK, EE, EL, FI, FR, HU, IE, IT, LT, LV, MT, PL, RO, SI, SK	26
Public Employment Services (PES)	BE, BG, EE, ES, HR, IT, LT, LU, LV, MT, RO, SE, SI, SK	16
Employer organisations	AT, BG, CY, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LU, MT, NL, PL	22
Trade unions	AT, BG, CY, CZ, DE, EL, ES, FI, FR, HR, LU, LV, NL, PL, SI	16
Civil society/youth organisations	AT, BE, CY, EL, ES, FI, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, RO, SI	17
Other stakeholders (e.g., research institutes; education and training organisations, etc.)	AT, BG, HU, IE, LV, NL, PL, PT, RO	10
Total of national level interviews		107

National experts conducted the interviews on the basis of an interview guide which included questions covering all evaluation criteria, including on quantifiable costs and benefits of implementation of the QFT for different stakeholders. This is included in [Appendix 5](#). A detailed and clear summary of the data collected during the interviews was gathered in a central interview grid to aid analysis.

Overall, the national experts often reported difficulties in scheduling the interviews, particularly due to lack of knowledge of the QFT specifically from national level stakeholders.

3.2.2. Task 1.2 Trainee survey

To gather a comprehensive understanding of the prevalence and quality of traineeship experiences in each Member State, we carried out an internet-based survey targeting the following types of respondents:

- **Current trainees:** trainees that are currently completing traineeships in one of the Member States.
- **Former trainees:** trainees that completed a traineeship in one of the Member States in 2014 or after.
- **Potential future trainees:** young people who have not done any traineeships yet.

The survey questionnaire was approved by DG EMPL and translated into all EU official languages. The survey ran from 1 March 2022 to 25 March 2022. Responses were as follows:

Category	Number of respondents	Share
Total respondents	3,814	100%
Within the core target group	1,836	48.1%
People with no traineeship experience	702	18.4%
Respondents with only mandatory traineeship experience	962	25.2%
People with traineeship experience before 2014	65	1.7%
Respondents with traineeship experience from non-EU countries	75	2.0%
Respondents with traineeship experience in multiple EU countries	84	2.2%
People with traineeship experience in the EU institutions	90	2.4%

To reach the widest possible audience and maximise the possibility of achieving a representative dataset, the research team adopted a dissemination strategy that primarily relied on the following three main channels:

- **Panel provider:** We collaborated with Dynata, a leading panel provider, to ensure a robust and representative response rate across all Member States. We were able to collect a total of 1802 responses through the panel.
- **Multipliers:** We compiled a list of a total of 580 publicly available email addresses of relevant organisations that could act as multipliers for the survey. These include youth organisations, civil society, and social partners with a high reach among the youth population in Member

States. These organisations were contacted via email with a request to share the link to the survey. The emails were translated when necessary.

- Social media: Two different approaches were used: paid social media advertising; and social media groups. Facebook ads were used to boost the visibility of the survey among the target audience. Moreover, 250 Facebook and Reddit social media groups were identified in all the Member States and the survey link was posted in these groups wherever possible. The posts were made both in English and the local language.

The analysis of survey results was carried out using both quantitative (for closed answers) and qualitative methods (for the open questions). The responses to the open-ended questions provided by the respondents in their native language were translated into English for better interpretation.

The results of the trainee survey are included in [Annex 8](#) of the main report and have been used to inform the findings of the final report. The questionnaire used for the survey is included in [Appendix 4](#).

3.2.3. Task 1.3 Ex-ante online expert meeting

The ex-ante online expert meeting was held on 26 April 2022 and was attended by 36 participants from the national and EU level (see Table below) to discuss national approaches to the implementation of the QFT as well as possible next steps for the future. The outcomes of the ex-ante online expert meeting are outlined in the meeting report included in [Annex 5](#) and were triangulated with data and information gathered through the other research activities for this study to come to the findings presented in the final report.

Table 4. Participants at the online expert meeting

Country	Organisation	Role/Job title
Austria	Arbeiterkammer Wien	Advisor for internships and political education
Croatia	Ministry of Labour, Pension System, Family and Social Policy	Senior Expert Advisor in Service for EU Policies and Implementation of LM related Projects
Estonia	Ministry of Social Affairs	Adviser at Work and Pension Policy Department
Finland	Confederation of Finnish Industries	Senior Advisor
Finland	The Central Organisation of Finnish Trade Unions SAK	Education and Labour Policy Specialist
France	UNML	Chargée de mission politiques publiques jeunesse
Germany	Federal Ministry of Labour and Social Affairs (Germany)	Ministerial Officer
Greece	Ministry Of Labour And Social Affairs	Head Of Vet Department
Hungary	Federation of the Chemical, Energy and General Workers' Unions	Assistant
Hungary	Ministry for Innovation and Technology of Hungary	Planning officer
Ireland	ETBI	Work Based Learning Manager
Ireland	Ministry of Employment	N/A
Italy	ANPAL	Researcher

Italy	CGIL - Italian general confederation of labour	Head of the European affairs
Latvia	Employers' Confederation of Latvia	Sub-project manager
Lithuania	Lithuanian Public Employment Service	Head of Measures Implementation Organization Division
Lithuania	Ministry of Social Security and Labour of the Republic of Lithuania	Adviser at Labour market group unit
Lithuania	Ministry of Social Security and Labour of the Republic of Lithuania	Advisor of Labour Market Group
Malta	Public Employment Service	Head of Division
Malta	General Workers' Union	Secretary General
Malta	Ministry for Finance and Employment	Director Policy Development and Programme Implementation
Malta	Jobsplus	Department Manager Training Services
Malta	Jobsplus	Head of Division
Netherlands	SBB	Policy Advisor
Poland	Ministry of Family and Social Policy	Chief expert
Romania	National Agency for Employment	Inspector
Romania	CNSLR Fratia	Youth President
Romania	Ministry of Labour and Social Solidarity	Head of Employment Unit
Slovak Republic	Confederation of trade unions in Slovakia (KOZ SR)	International Secretary
Slovenia	Sindiklat Mladi plus (trade union)	president
Spain	Spanish Confederation of Employers' Organizations	Senior Advisor
Spain	CCOO	International And Youth Secretariats On FSS-CCOO
Spain	SEPE - Employment Services Ministry Of Labour-Spain	Head of Unit at Employment Services
EU level	European Youth Forum	Policy and Advocacy Manager
EU level	ETUC - European Trade Union Confederation	Policy adviser
EU level	European Youth Forum	Policy Officer
EU level	EUROCHAMBERS	Senior Policy Advisor

3.2.4. Task 1.4 Online validation workshop

The online validation workshop was held on 20 September 2022 and attended by 36 experts and the DG EMPL and Ecorys research team (see table below). Participants were sent an input paper in advance outlining the key findings and lessons learned of the study. During the workshop participants provided feedback on the findings which was used as evidence to finalise the study's findings and the lessons learned. Following the workshop, written inputs were received from two participants, SME United and Business Europe.

The full report of the validation workshop including a summary of the written inputs is included in **Annex 6** of the final report.

Table 5. Participants at the validation workshop

Country	Organisation	Role/Job Title
Austria	Federal Chamber of Labour / Arbeiterkammer	Education Policy Advisor
Belgium	Ministry of Education, Netherlands	Education attaché
Belgium	VDAB	Expert work based learning
Denmark	Confederation of Danish Employers	Senior Advisor
Estonia	Estonian Unemployment Insurance Fund	Service Manager (Employer Services)
Estonia	Eesti Töoandjate Keskkliit /Estonian Employers' Confederation	Education adviser
Estonia	Ministry of Social Affairs	Head of ALMPs
Greece	Ministry of Labour and Social affairs	Head of vet department
Hungary	Ministry for Technology and Industry	planning officer
Hungary	Ifjúsági Paktum Egyesület (Pact for Youth Association)	Project assistant
Hungary	Pact for Youth Association	president
Italy	Confindustria	Education Adviser
Italy	Confartigianato Imprese	Policy Advisor
Lithuania	The Ministry of Social Security and Labour of the Republic of Lithuania	Advisor of the Labour Market Group/National Youth Guarantee Coordinator
Lithuania	Ministry of Social Security and Labour	Adviser
Malta	Ministry for Finance and Employment	Director, Policy Development and Programme Implementation
Malta	Ministry for Finance and Employment	Manager I
Malta	Jobsplus	Head of Division
Malta	MTRM	CEO
Netherlands	UWV/NCO EURES	Business Adviser
Netherlands	SBB	Adviser
Portugal	Employment and Vocational Training Institute (Public Employment Service)	Jurist
Romania	CNSLR Fratia	President Youth Commission
Romania	Ministry of Labour and Social Solidarity	Head of Employment Policies and Social Economy Unit, Employment Policies, Competences and Professional Mobility Directorate
Romania	Public Employment Service	Deputy Director
Spain	SPANISH CONFEDERATION OF EMPLOYERS ORGANIZATIONS	Senior Advisor
Spain	Ministry of Universities	Deputy Director General for Students' support and Institutional Relations

Spain	UGT Spain	Project Manager
Spain	Servicio Público de Empleo Estatal	Spanish Youth Guarantee Coordinator
Spain	Inspección de Trabajo y Seguridad Social (Labour and Social Security Inspectorate)	Inspector
Spain	ANECA - National Agency for Quality Assessment and Accreditation	N/A
Spain	ANECA - National Agency for Quality Assessment and Accreditation	Project officer
EU	SMEunited	Policy Adviser
EU	Eurofound	Research manager
EU	BusinessEurope	Senior Adviser
EU	ETUC, European Trade Union Confederation	Adviser
EU	European Youth Forum	Policy and Advocacy Manager Youth Rights
EU	European Youth Forum	Policy Officer Social and Economic Inclusion
EU	EUROCHAMBERS	Director
EU	Friedrich-Ebert-Stiftung	Policy Officer

3.3. Task 2 Mapping

As per the technical specifications of the study, the mapping task aimed to:

- Present the situation in each of the 27 EU Member States since 2014 as regards traineeship quality and QFT implementation
- Present a clustering/grouping of Member States as regards traineeship quality and QFT implementation

As the QFT is a reference framework designed to be in large part ‘transposed’ into national legislation in Member States, assessing the degree of implementation of the QFT involves examining several interconnected aspects– implementation of the legal principles of the QFT in national legislation/frameworks for traineeships, implementation of these principles in traineeships taking place ‘on the ground’ and implementation of the other cross-cutting principles of the QFT concerning policy, governance and funding of the traineeships in Member States and by the Commission.

In order to ensure the assessment of all these aspects was undertaken systematically and in a comparable way across research tasks, the study team reformulated, re-numbered and, in some cases, grouped the principles of the QFT to allow for greater clarity in the research. This is set out in a standardised list of principles used throughout the study, as presented in Table 6.

Table 6. Standardised set of principles set out in the Quality Framework for Traineeships used in the study

Type of principle	Definition	Topic	No. used in the study	Simplified phrasing of the principles used during the study research	Equivalent no. in the CR	Actual wording of the principles in the Recommendation
Legal principles	Principles on traineeship standards and conditions that can be implemented in national legislation/ quality frameworks	Written agreement	1	Traineeships are based on a written agreement	2	Require that traineeships are based on a written agreement concluded at the beginning of the traineeship between the trainee and the traineeship provider;
			2	Written agreements indicate educational objectives, working conditions, whether an allowance or compensation is provided and how much, rights/obligations of all parties, duration	3	Require that traineeship agreements indicate the educational objectives, the working conditions, whether an allowance or compensation is provided to the trainee by the traineeship provider, and the rights and obligations of the parties under applicable EU and national law, as well as the duration of the traineeship, as referred to in recommendations 4-12;
		Learning and training	3	Tasks allow the trainee to work towards their learning and training objectives	4	Promote best practices as regards learning and training objectives in order to help trainees acquire practical experience and relevant skills; the tasks assigned to the trainee should enable these objectives to be attained;
			4	Traineeship providers assign a supervisor for the trainee	5	Encourage traineeship providers to designate a supervisor for trainees guiding the trainee through the assigned tasks, monitoring and assessing his/her progress;
		Working conditions	5	Trainees' rights and working conditions under applicable law are respected including limits to max weekly working time, weekly rest periods, minimum holiday entitlements	6	Ensure that the rights and working conditions of trainees under applicable EU and national law, including limits to maximum weekly working time, minimum daily and weekly rest periods and, where applicable, minimum holiday entitlements, are respected;
					9	Encourage the concerned parties to ensure that the traineeship agreement lays down the rights and obligations of the trainee and the traineeship provider, including, where relevant, the traineeship provider's policies on confidentiality and the ownership of intellectual property rights;
			6	Traineeship providers clarify if they provide trainees with health and accident insurance and sick leave	7	Encourage traineeship providers to clarify whether they provide coverage in terms of health and accident insurance as well as sick leave;
		Transparency	7	The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount.	8	Require that the traineeship agreement clarifies whether an allowance or compensation is applicable, and if applicable, its amount;
			8	Traineeship providers include in their vacancies information on the conditions of the traineeship including information on recruitment policies	14	Encourage traineeship providers to include in their vacancy notices and advertisements information on the terms and conditions of the traineeship, in particular on whether an allowance and/or compensation and health and accident insurance are applicable; encourage traineeship providers to give information on recruitment policies, including the share of trainees recruited in recent years;
					15	Encourage employment services and other providers of career guidance, if providing information on traineeships, to apply transparency requirements;
		Duration	9	The duration of the traineeship does not exceed six months, except when justified	10	Ensure a reasonable duration of traineeships that, in principle, does not exceed six months, except in cases where a longer duration is justified, taking into account national practices;
			10	The conditions for an extension or renewal of the traineeship are clarified	11	Clarify the circumstances and conditions under which a traineeship may be extended or renewed after the initial traineeship agreement expired;
			11	The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship	12	Encourage the practice of specifying in the traineeship agreement that either the trainee or the traineeship provider may terminate it by written communication, providing advance notice of an appropriate duration in view of the length of the traineeship and relevant national practice;
Cross-cutting principles	Principles on cooperation, funding and cross-border traineeships that can be implemented through policy actions and cooperation across relevant actors	Cross-border mobility	13	Member States facilitate cross-border mobility of trainees in the EU, by clarifying rules and using the EURES network	16	Facilitate the cross-border mobility of trainees in the European Union inter alia, by clarifying the national legal framework for traineeships and establishing clear rules on hosting trainees from, and the sending of trainees to, other Member States and by reducing administrative formalities;
					17	Examine the possibility to make use of the extended EURES network and to exchange information on paid traineeships through the EURES portal;
		Use of EU funds	14	Member States make use of EU Structural and Investment Funds to increase the number and quality of traineeships	18	Make use of the European Structural and Investment Funds, namely the European Social Fund and the European Regional Development Fund, in the programming period 2014-2020, and the Youth Employment Initiative, where applicable, for increasing the number and quality of traineeships, including through effective partnerships with all relevant stakeholders;
					20	Provide information to the Commission by the end of 2015 on the measures taken in accordance with this Recommendation;
		Involvement of relevant actors	15	Member States provide information to the Commission by the end of 2015 on the measures taken in accordance with this Recommendation;	21	Promote the active involvement of social partners in applying the Quality Framework for Traineeships;
					22	Promote the active involvement of employment services, educational institutions and training providers in applying the QFT
Principles for the EC	Actions for the European Commission to support Member	Fostering cooperation	17	Foster cooperation with the Member States, the social partners and other stakeholders with a view to swiftly applying the QFT	23	Foster close cooperation with the Member States, the social partners and other stakeholders with a view to swiftly applying this Recommendation
		Monitoring and reporting	18	Monitor progress in cooperation with Member States & through EMCO	24	Monitor, in cooperation with the Member States and in particular through EMCO, the progress in applying the Quality Framework for Traineeships pursuant to this Recommendation and analyse the impact of the policies in place

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

	State efforts to apply the QFT.	Promotion of the QFT	19	Report on the progress in applying the QFT on the basis of information provided by Member States	25	Report on the progress in applying this Recommendation on the basis of information provided by Member States
			20	Work with Member States, social partners, employment services, youth and trainee organisations and other stakeholders to promote the QFT	26	Work with Member States, the social partners, employment services, youth and trainee organisations and other stakeholders to promote this Recommendation;
			21	Promote the exchange of best practices to make use of the EU funds to increase the number and quality of traineeships	27	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;
		EURES	22	Examine, together with the Member States, the possibility to include paid traineeships in EURES, and set up a dedicated webpage on national legal frameworks for traineeships	28	Examine, together with the Member States, the possibility to include paid traineeships in EURES, and set up a dedicated webpage on national legal frameworks for traineeships.
General application	Principles calling for the general application of the QFT	General application of the QFT	-	Improve the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work by putting in practice the following principles for a Quality Framework for Traineeship	1	Improve the quality of traineeships, in particular as regards learning and training content and working conditions, with the aim of easing the transition from education, unemployment or inactivity to work by putting in practice the following principles for a Quality Framework for Traineeship
			-	Take appropriate measures to apply the Quality Framework for Traineeships as soon as possible;	19	Take appropriate measures to apply the Quality Framework for Traineeships as soon as possible;

Source: Ecorys, from QFT

This standardised list was then used in the assessment of the three aspects of implementation of the QFT. Different sources of evidence contributed to the assessment of each of the three aspects. The table below presents the framework for assessment of implementation of the QFT, indicating the main evidence base and the principles assessed for each of the three aspects of implementation.

Table 7. Overview of framework for assessment of implementation of the QFT

Aspect of implementation of the QFT	Sub-aspect	Principles assessed (study numbering - cf. Figure 2)	Main evidence base	Task in the study
Implementation of the QFT in national legislation/frameworks	Regulatory approach	1 to 12	<ul style="list-style-type: none"> Mapping (desk research, national interviews) National and legal expert assessment 	2.1 (mapping: desk research)
	Degree of implementation by principle			2.3 (mapping: analysis) 1.1 (consultations: interviews)
Implementation of the QFT principles on the ground		1 to 12	<ul style="list-style-type: none"> Traineeship vacancy review 	2.1 (mapping: desk research)
		QFT as a whole	<ul style="list-style-type: none"> Desk research and national interviews, specifically on obstacles for traineeship providers and impact of traineeships on trainees National expert assessment Survey of trainees 	2.2 (mapping: labour market review) 2.3 (mapping: analysis) 1.1 (consultations: interviews) 1.2 (consultations: trainee survey)
Implementation of other principles of the QFT	Cross-border mobility	13	<ul style="list-style-type: none"> Desk research National and EU level interviews Expert meeting Validation workshop 	2.1 (mapping: desk research)
	Use of EU funds	14		1.1 (consultations: interviews)
	Involvement of relevant actors	15 to 16		1.3 (consultations: trainee survey)
	Actions by the European Commission	17 to 22		1.4 (consultations: trainee survey) 3 (case studies)

Source: Ecorys, 2022

On the basis of this framework, the mapping was then conducted in four stages, in parallel with Task 2, which are further detailed in the sections that follow.

3.3.1. Task 2.1 Desk research at the national level

This subtask was designed to provide a foundation of evidence on both implementation of the QFT in national legislation and implementation of the QFT on the ground, which was then triangulated with findings from the consultation tasks outlined above.

National experts identified and analysed national sources, mainly:

- relevant statistics and indicators;

- relevant legislation;
- national traineeship quality frameworks and monitoring mechanisms;
- evaluation reports, impact assessments
- experts' opinions, and other relevant academic and grey literature.

The national experts gathered secondary data available at the national level, expanding on the evidence available at the EU level.

Two briefing sessions were organised for the national experts in February 2021. During these sessions, the Ecorys team outlined the research aims and methodology, and presented the template to be used for national mapping, structured as per the analytical framework described above.

3.3.2. Task 2.2 Labour market review of traineeship vacancies

The main goal of Task 2.2 was to contribute to the evidence base for assessing the **implementation of the QFT on the ground** by checking the current quality of traineeship vacancies in each Member State through primary data collection. The rationale was gather evidence to understand to what extent traineeship providers include specific information in their traineeship offers on elements called for by the QFT, with this serving as a proxy for capturing the degree of actual application of the QFT principles in traineeship offers.

We analysed the alignment of current traineeship vacancies with the 12 legal principles of the QFT, focusing on three main areas: the transparency of the vacancy, the duration of the traineeship and the working conditions set out in the vacancy.

Table 8. Principles assessed in the labour market review

Principle		Principle no. (study numbering)
Transparency	Traineeship based on a written agreement	1
	Mentioned health insurance	6
	Mentioned accident insurance	
	Mentioned sick leave	
	Mentioned allowance or compensation for work during the traineeship	7
	Mentioned the amount of allowance or compensation	
	Traineeship provider gives information on recruitment policies, including the share of trainees recruited in recent years	8
Duration	Mentioned duration of the traineeship	9
	Mentioned the conditions for an extension or renewal of the traineeship	10
		11
Working conditions	Mentioned the goals of the traineeship / the range of responsibilities	3
	Mentioned information about working time limits (maximum weekly working time, minimum daily and weekly rest periods)	5
	Mentioned information about minimum holiday entitlements	

	Mentioned assigning a supervisor for the trainee	4
	Clarified learning and training objectives	2
	Traineeship provider will attest to traineeship through a certificate	12

Source: Ecorys, 2022

The initial aim was to review up to 2700 traineeship vacancies. However, a number of obstacles made the achievement of this challenging. The biggest challenge was the collection of ALMP traineeship offers. The research team faced problems with the availability of data and data sources in Austria, Bulgaria, Croatia, Cyprus, Czechia, Denmark, Estonia, Hungary, Latvia, Lithuania, Malta, Romania and Spain. In response, during the data collection phase, we implemented three additional steps to collect the missing data, following consultation and support from DG EMPL.

- Firstly, we contacted (via phone and e-mail) employment offices in the majority of the above-listed countries. Most of the contacted entities did not reply to our requests.
- Secondly, we asked national experts to provide sources and links to ALMP traineeship vacancies. Generally, the information and data received were not sufficient at this stage of the research process.
- Thirdly, we asked DG EMPL to support Ecorys in approaching national contacts in PES to provide the necessary data. Seven countries sent feedback following this – Croatia, Denmark, Greece, Estonia, Latvia, Hungary, and Romania. However, only Croatia sent a link to several ALMP traineeship vacancies, which were subsequently included in the labour market review.
- The research showed that a number of countries (BG, HR, CY, CZ, DE, EE, HU, LV, LT, MT, RO, ES) either do not have a dedicated portal with ALMP traineeship offers or such vacancies are not publicly available because traineeships are internally managed by regional and national PES. These circumstances translated into an overall lower number of analysed vacancies in several countries.

Despite these challenges, we collected and analysed **1,972** traineeship offers in 27 EU Member States: 1,272 open market traineeship vacancies and 700 ALMP traineeship vacancies. In the final phase of this sub-task, after triangulation by the core research team and final review by the national experts, a total of **1,696 vacancies offers** were included in the final analysis: 996 open market and 700 ALMP traineeships.

Each principle was assessed separately with a percentage scoring indicating the share of vacancies that addressed the principle. An average across all scores was then calculated to obtain an overall assessment of the degree of implementation of the QFT principles in traineeship vacancies. Based on this, each country was scored as follows:

- **High:** If a country obtains more than 88% average score in review criteria
- **Moderate:** If a country obtains 65 – 87% average score in review criteria
- **Low:** If a country obtains 31 – 64% average score in review criteria
- **Very low:** If a country obtains 0 – 30% average score in review criteria

The number of analysed vacancies were deemed sufficient to investigate to what extent vacancies are aligned with the QFT. The results of the labour market review are presented in full in **Annex 2** of the final report. These results were triangulated with evidence gathered under Task 2.1 (desk research) Task 2.3 (Analysis of QFT implementation), Task 1.1 (interview programme) and Task 1.2

(survey of trainees) to provide an assessment of the degree of implementation of the QFT on the ground in each Member States (presented in section 3.

3.3.3. Task 2.3 Analysis of QFT implementation and traineeship quality at the national level

In order to bring together the findings of the research on degree of implementation of the QFT in national legislation and degree of implementation of the QFT on the ground, Ecorys prepared an assessment template consisting of three sections. The template was presented, discussed and approved by the High-Level Advisors during several consultations and completed by national experts throughout the research process from February to May 2022. The Ecorys team provided guidance and support in solving methodological and other research problems.

The assessment template consisted of the following sections, each of which contributed to the overall assessment of the degree of implementation of the QFT in each Member State.

Section A: Overview of the country situation in terms of traineeships, including information on the overall regulatory framework of both ALMP and open market traineeships in the country, an assessment of the evolution of the prevalence of traineeships in the country since 2014.

Section B: Implementation of the QFT in national legislation: this was structured by principle and covered each of the 12 legal principles of the QFT that can be implemented in national legislation. A separate assessment grid was included for ALMP and open market traineeships. National experts had to assess degree of implementation in national legislation of *each* principle and assign a score: Fully/mostly implemented; Partially implemented; Not implemented; Not applicable.

On the basis of the scores for each principle, national experts assigned an ***overall score on degree of implementation of the QFT in national legislation*** as follows:

- **Fully/mostly implemented**: 10 or more principles out of 12 implemented in national legislation
- **Partially implemented**: 6 to 9 principles out of 12 fully or partially implemented in national legislation
- **Modestly implemented**: 3 to 5 principles out of 12 fully or partially implemented in national legislation
- **Not implemented**: 2 or fewer principles out of 12 fully or partially implemented in national legislation
- **Not applicable**: if none of the QFT's principles are implemented because this type of traineeship does not exist in the country.

Section C: Implementation of the QFT on the ground. The third section of the assessment framework included three assessment areas as follows:

1. **Results of the labour market review of traineeship vacancies**: National experts were asked to and validate the findings of the labour market review. They were able to revise the scoring for their country based on evidence found during other research tasks (national interviews, desk research) but had to justify this revision with the relevant evidence. The scoring system under this criterium is explained section 3.3.2.
2. **Obstacles to the implementation of the QFT principles in traineeships on the ground**: National experts were asked to identify any obstacles to implementing quality traineeships on

the ground faced particularly by traineeship providers. The assumption for the analysis of degree of implementation on the ground is that a high degree of obstacles is likely to translate into a lower number of quality traineeships in line with the QFT offered by traineeship providers, and thus a lower degree of implementation of the QFT on the ground, and vice versa.

They were asked to support their judgments based on the following evidence:

- wide public debate on QFT in a country during last 5 years
- social partners, unions of entrepreneurs, chambers of commerce, trade unions, etc. have pointed out in official statement obstacles in QFT implementation and proposed changes in legal/ official documents
- studies and/or surveys available that evidence obstacles
- central public institution responsible for implementation QFT has proclaimed/prepared /implemented recently legal changes to traineeship regulations at the request of social partners, trade unions, chambers of commerce, other public institutions, etc. or their enforcement,
- Other evidenced-based and public information and data which show obstacles in QFT implementation.

Scoring system: national experts scored the degree of obstacles to QFT practical implementation from 1-5 based on the following scoring system. This scoring system was not quantified so as to ensure its relevance across a wide diversity of country contexts and sizes. Experts were asked instead to use their expert assessment to score based on the following:

- 1. No obstacles: if no obstacles to QFT implementation were evidenced
 - 2. Minor obstacles: if there are some obstacles evidenced but they are minor and easy to overcome
 - 3. Some major obstacles: there are several obstacles evidenced and they are significant (difficult to overcome)
 - 4. Many/major obstacles: if many evidenced obstacles in the country and/or the evidenced obstacles are highly significant
3. **Degree of impact of the QFT on the ground:** National experts were asked to assess the degree of impact of the QFT on trainees, based on the interview findings, desk research and any relevant results from the trainee survey. The assumption for the analysis of degree of implementation on the ground is that evidence of positive impact of traineeships on trainees can be partly understood as resulting from a high degree of implementation of the principles of the QFT in traineeships taking place in Member States, and thus a high degree of implementation of the QFT on the ground. Specifically, they were asked to assess:
- Whether there are sectors or subgroups for which the QFT is less effective
 - Whether there is evidence of the QFT/quality traineeships increasing stable labour market integration since 2014

Scoring system: national experts scored the QFT impact based on the following scoring system:

- 1. High: Experts opinions backed-up with evidence that the QFT supports a high quality of traineeships and impacts in a positive way trainees and society in your country in such areas

as for instance: employment, further learning, starting an apprenticeship, higher salaries, improving and gaining new skills, networking, learning foreign languages, etc.

- 2. Moderate: Experts opinions backed-up with evidence that QFT supports in significant way quality of traineeships and impacts on trainees and the society in your country in a significant way in such areas as for instance: employment, further learning, starting an apprenticeship, higher salaries, improving and gaining new skills, networking, learning foreign languages, etc.
- 3. Low: Experts opinions backed-up with evidence that QFT supports in insufficient way quality of traineeships and its impact on trainees and the society in your country is low in such areas as for instance: employment, further learning, starting an apprenticeship, higher salaries, improving and gaining new skills, networking, learning foreign languages, etc.
- 4. Very low/no: Experts opinions backed-up with evidence that QFT does not support quality of traineeships and has an adverse impact (negative) on trainees and the society in your country in such areas as for instance: employment, further learning, starting an apprenticeship, higher salaries, improving and gaining new skills, networking, learning foreign languages, etc.

On the basis of these three assessment areas, national experts made an **overall assessment of the degree of implementation of the QFT on the ground:**

- **High:** There is a high quality of vacancies, lack of obstacles to QFT implementation on the ground, and evidence of positive QFT/traineeship impact on trainees and society
- **Moderate:** There is a moderate or low quality of vacancies, some obstacles to QFT implementation on the ground, but evidence of positive QFT/traineeship impact on trainees and society
- **Low** There is a moderate or low quality of vacancies, some obstacles to QFT implementation on the ground, and weak evidence of positive QFT/traineeship impact on trainees and society
- **Very low:** There is a weak quality of vacancies, major obstacles to QFT implementation on the ground, and evidence of low or negative QFT impact on trainees and society

The scores from sections B and C of the assessment template were then used in triangulation with other evidence gathered in the course of the study to come to a final assessment of the implementation of the QFT which was used to establish how the situation on traineeships has evolved since 2014, as outlined in section 3 of the final report.

3.3.4. Task 2.4 Comparative analysis and clustering of 27 EU Member States

On the basis of the outcomes of Tasks 2.3, the team then conducted a comparative analysis of the implementation of the QFT in national legislation and the implementation of the QFT on the ground in EU Member States. We then clustered EU countries according to this comparison into five distinct groups with similar trends and approaches to QFT implementation. The results of the comparative analysis are presented in Section 3.4 of the final report.

3.4. Task 3 Case studies

Seven case studies were undertaken, examining in-depth the implementation of the QFT in the following countries: Austria, Bulgaria, Greece, Ireland, Italy, Lithuania, and Spain. The methodological approach for developing the seven case studies was based on the triangulation of evidence using:

- Available **quantitative data** (including proxies) at national/regional level on traineeship uptake, including country-specific contexts and detailed 2014-21 trends. The analysis of quantitative data also considered the information collected from the targeted consultations (Task 1) and the mapping (Task 2);
- A complete analysis of available **qualitative data** through desk research, providing insight into ongoing debates on the quality framework for traineeships within Member States and further contextual data and information, building on from the research conducted during the mapping (Task 2).
- **Qualitative data based on four to five individual in-depth interviews** with relevant stakeholders depending on the country context (e.g., implementing organisations and social partners, such as trade unions, employer organisations, PES, etc.);
- **Focus groups to explore the experience of trainees** participating in specific programmes. These were undertaken in Bulgaria, Ireland and Spain.

The case study template was drafted by the core research team at the inception phase and revised following the interim report meeting. Revisions to the case study template were focused on gathering evidence on aspects of the study where data gaps remained, in particular:

- Quantitative evidence on the costs and benefits of implementing the QFT/quality traineeships. For the purposes of this, our high level economist was consulted, and additional guidance was provided to the national experts on how to gather quantitative information on costs and benefits.
- Evidence on cross-border traineeships and their prevalence in the Member State
- Evidence on the extent to which traineeships are/are considered to replace regular entry-level jobs for young people

The final case study reports were drafted on the basis of all evidence gathered on implementation of the QFT in each country throughout the whole study. The case studies provided key evidence to underpin and validate the study findings.

3.5. Task 4 Supporting the Commission with the public consultation

The European Commission published a public consultation on the Council Recommendation on a Quality Framework for Traineeships (QFT) on 23 March 2022 on its website Have your say. The consultation remained open until 13 June 2022. The consultation targeted all citizens, and in particular young people who have already done a traineeship or who are interested in doing one, and traineeship providers, as well as organisations representing young people, social partners, PES, public administration, civil society, businesses, academia, and researchers, along with organisations offering traineeships.

The survey included closed and open-ended questions that were filtered and routed, where necessary, to tailor the relevance of the survey to each stakeholder group. The survey was available in the 24 official languages of the EU.

3.5.1. Dissemination of the public consultation

To increase the visibility of the public consultation and reach out to a variety of stakeholder groups, the research team developed a dissemination strategy. As part of that strategy, 47 organisations who could act as multipliers at EU and national level were contacted. The link to the public consultation was also included in the newsletter of the European Alliance for Apprenticeships (EAfA) and promoted on the EAfA social media aiming to target employers across the EU.

The targeted organisations included the following groups:

- National and regional ministries responsible for education and training;
- Other relevant national/regional bodies responsible for management / implementation of employment, training, education and labour market policy, such as labour inspectorates;
- Social and economic partners at EU and national level / employers;
- Organisations representing young people and trainees and young workers in precarious conditions, which included 27 European National Youth Councils;
- All national stakeholders.

3.5.2. Methodology for analysing the results

The research team analysed the results of the public consultation. Respondents' views were examined through a combination of closed questions and open-ended questions. Closed questions provided respondents with either different pre-set categorical answers from which to choose (e.g., the extent to which the principles of the QFT have been implemented in their country or at the EU level, the contribution of the QFT to specific benefits at the national and EU level), or asked them to rate the effectiveness, efficiency, coherence and relevance of the QFT and/or actions implemented in response to it.

The analysis of results was carried out using both quantitative (to analyse the frequencies of the closed answers) and qualitative methods (for the open questions, in order to analyse complex concepts as well as to substantiate and interpret the quantitative data with relevant insights). In addition, the research team categorised the responses through a range of relevant typologies (type of respondent, types of organisations).

3.5.3. Preparation of the dataset

As a first step for analysis the replies to the public consultation were downloaded from the EU Survey Tool and a new excel database for analysis was created. This consisted of cleaning the dataset, creating classifications for answers received and checking for coherence and completeness. In the first place, multiple responses by the same respondents were checked. No single respondent (identified by their name and email address) submitted more than one response.

The research team analysed relevant differences between sub-groups of on the basis of disaggregation by type of organisation and groups of respondents where this was possible. However, when results are disaggregated, inferences should be made with caution with regards to the results.

3.5.4. Quantitative analysis (closed questions)

The quantitative data analysis included an analysis of frequency distribution for each of the variables related to the closed-ended questions. Depending on the particular variable, all of the data values were represented. Frequency distributions were also depicted as graphs (histograms) as applicable. Cross-tabulations between specific variables and characteristics of respondents (e.g., type of stakeholder categories, type of respondent) were also conducted, where possible, though the low number of responses has limited the possibilities for this. The responses to the closed questions of the questionnaire were analysed using Excel and R. The statistical significance of the differences observed could not be further tested due to the low number of responses received.

3.5.5. Qualitative analysis (open questions)

As a first step, the answers related to open-ended questions were translated by the research team. With respect to qualitative data analysis, information was classified by related variable (number of question) and analysed to identify additional relevant information and trends. The information was used to enrich the analysis carried out on quantitative data. Such information is reflected in the report through the inclusion of examples which help to illustrate key issues or trends at EU and national level identified in the quantitative analysis.

3.5.6. Interpretation of results

The questionnaire was structured in a way that all the respondents had to fill in the descriptive section covering background information related to themselves, while the questions in the main sections differed according to the stakeholder category to which the respondent belongs.

Each question was analysed separately in order to ensure a consistent analysis of the responses. The report is structured by the evaluation criteria (effectiveness, efficiency, relevance, coherence and EU added value) and includes a short introduction and rationale, the presentation of results (frequency of responses) in terms of figures or tables, and qualitative analysis for open-ended questions including, where possible, a breakdown of responses according to the most relevant dimensions (such as stakeholder category, type of respondent).

3.5.7. Respondents to the public consultation

The public consultation received 259 contributions, with the majority coming from Poland (37%) and Spain (20%). There is a big discrepancy in national representation, with only one response registered for at least a third of Member States which could decrease the quality of findings.

The methodology and the results are detailed in [Annex 7](#) of the final report. The questionnaire is included in [Appendix 3](#).

3.6. Additional work conducted to obtain data on costs and benefits of implementing the QFT

In view of the lack of quantifiable data on costs and benefits gathered by interim phase of the study, the research team carried out additional research to gather such data for the final report, as follows:

- Adaptation of the case study templates (see Appendix 6) and the case study interview guides to add additional questions on quantifying costs and benefits following the feedback received at interim phase.

- Provision of additional guidance to the national experts conducting the interviews and the case study research on how to gather costs and benefits data, in consultation with the study labour economist.
- Regular consultations with the study labour economist to explore all possible options for quantifying costs and benefits and ensure that the research tools were able to gather this data. This also included suggestions on how to overcome a lack of data, through for example: “If not possible to estimate costs, can you give an indication of the amount of the costs relative to a benchmark (e.g., the average salary of someone in the level of job to which the traineeship is targeted)?”
- Revising the agenda of the expert meeting to cover also costs and benefits
- Targeting of EU employer organisations to ensure their attendance at the validation workshop
- Direct follow-up work with two EU employer organisations to gather data on costs of QFT or traineeship implementation, on the basis of the following table

These efforts results in some additional data on costs and benefits, but purely qualitative. The exception was one input submitted by an SME in Belgium, member of SME United, which has been included in the report and fully used in the analysis of costs and benefits of QFT implementation (Section 4.1 of the final report).

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Phase (assume 6-month traineeship)	Action for the traineeship provider	QFT principle this relates to	Hours spent by traineeship provider staff member	Cost in euros to the traineeship provider	Explanatory comment
Recruitment	Drafting the vacancy notice with specific information on: <ul style="list-style-type: none"> - whether an allowance and/or compensation are provided - whether health and accident insurance are applicable; - recruitment policies, including the share of trainees recruited in recent years by the company; 	14			
On-boarding	Drafting the written agreement with specific information on: <ul style="list-style-type: none"> - the working conditions - whether an allowance or compensation is provided - the rights and obligations of the parties under applicable EU and national law, - the duration of the traineeship 	2 and 3			
	Drafting the learning objectives of the trainee (e.g., meeting with the trainee to discuss and agree on their learning objectives/ drafting them/including them in the written agreement)	3 and 4			
During the traineeship	Providing a supervisor to the trainee that supports them through their traineeship (e.g., assigning one staff member to be the supervisor, meet on regular basis, manage the trainee)	5			
	Providing on-the-job training to the trainee during their traineeship	4			
End of traineeship	Assessing the skills acquired by the trainee at the end of the traineeship (e.g., through an exit interview/specific skills assessment etc.)	13			
	Certifying the skills that the trainee has acquired during the traineeship through a certificate (e.g., drafting a certification/letter of reference for the trainee)	13			

3.7. Task 5 Analysis and reporting

In order to produce the Interim and Final reports, all the evidence and findings from the different research Tasks (1-4) were gathered together and organised by our Research Team in line with the structure of our evaluation framework for the study. The evaluation framework provided the structure for all the study research tools, which ensured that the findings from all the different Tasks for each evaluation criterion can be easily collated in the interim and final stages of the study for analysis.

The evidence gathered through all the research tasks (mapping, targeted and public consultations, case studies) was analysed and triangulated to provide answers to all the evaluation questions and sub-questions, with systematic reference to the evidence and/or analysis underpinning the findings presented. The analysis was presented in the reports in sections corresponding to each of the evaluation criteria. We included boxed examples of illustrative examples where relevant throughout the reports.

The Research Team used the intervention logic as a basis to assess, by contribution analysis, the degree to which the implementation of the QFT is meeting the objectives set, and delivering the expected outputs, results and impacts, with an optimal degree of efficiency and in line with actual needs and problems.

4. Summary of limitations and mitigation measures

There were a number of specific limitations associated with the scope and coverage of the research, the quality of available data and the methodology that was developed, given the constraints of the available resources for the study. These limitations were taken into account in the design and implementation of the study as outlined in the Table below.

Table 9. Key limitations of the research

Limitation/challenge	Explanation	Mitigation measures taken
Lack of existing solid secondary evidence on traineeship prevalence, quality and impact on young people's transition to the labour market	Due in part to the diversity of definitions of traineeships, as well as the range – and sometimes absence – of regulatory approaches to traineeships in Member States, there is a lack of solid evidence on traineeships in Europe. Firstly, there is no comparable EU-wide statistical data on the prevalence of open market traineeships. Data is not collected at the EU level on participation in open market traineeships, meaning that it is hard to reliably quantify the prevalence of traineeships in Member States, and understand which target groups are undertaking them. Several EU studies have used proxy indicators, but these do not provide a thorough scientific understanding. Data on ALMP traineeships is more readily available through ALMP participation data from Public Employment Services, yet this is not necessarily specific to traineeships, as the types of action defined do not include a separate 'traineeship' category, but rather a 'training' one, which has a broader scope than the subject of our study.	Our methodological approach to the study addressed this challenge in several ways. Firstly, our preliminary literature review during the inception phase allowed us to identify relevant cross-country research which we built upon extensively during Task 2 with relevant documentation on traineeships on the national level. However, given that this data is not available for each Member State and is not comparable across Member States, we undertook a quantitative analysis using proxy variable to provide an estimate of traineeship prevalence across EU Member States and how this has evolved since 2014. The results of this are presented in Section 3 of the final report.
Diversity in regulatory approaches to	Linked to the challenge on data availability is the fact that regulatory approaches to	To address this, the mapping included a specific legal review

traineeships across Member States	traineeships in Member States hugely vary. This makes it challenging to compare the degree to which regulation in response to the QFT Recommendation has been implemented, as well as to assess compliance and enforcement.	and analysis on the degree to which the QFT principles have been implemented into national legislation/frameworks and examine the enforcement/compliance measures in place. This was undertaken by national experts and reviewed by legal experts in each Member State and was triangulated with findings from the consultation tasks undertaken on the national level to ensure a precise and reliable understanding of the regulatory frameworks and degree of implementation of the QFT in these frameworks for analysis of the effectiveness, relevance and efficiency of the QFT.
Diversity of stakeholders involved in implementing traineeships and the QFT	Responsibility for implementation of the QFT - in particular, its implementation into national law, enforcement and monitoring - can lie with a range of national authorities depending on the existing regulatory framework, and the structure and roles of the labour market institutions in different Member States. This means that it is not easy to identify the main interlocutor at the national level for implementation of the Recommendation.	We have addressed this challenge through our extensive consultation programme (outlined in our consultation strategy) in which we interviewed a diversity of actors, as relevant to the specific institutional and legal setup in that country. We also fully utilised any EU-level entry points into identifying relevant national stakeholders, with the support of DG EMPL, in particular reaching out to the PES Network and the Youth Guarantee Coordinators in each Member State.
Gathering the views of traineeship providers	Implementation of the QFT also relies on traineeship providers themselves who are ultimately responsible for offering quality traineeships that abide by the principles of any QFT-related legislation in place in each Member State. Traineeships are provided by a wide range of employers and organisations– from public and private to third sector organisations.	We engaged with the PES on ALMP traineeships during our consultation activities. Our labour market review (Task 2.2) allowed us to assess the types of traineeships offered by traineeship providers in the current open labour market and included traineeship opportunities in each of the main sectors of economic activity in Europe.
Lack of quantifiable evidence on costs and benefits of QFT implementation	<p>Analysis of the efficiency of the QFT is hampered by a lack of quantifiable data on benefits and costs, and an absence of monitoring of the effects of its implementation. Conceptually and practically, it is extremely difficult to reliably assess the potential benefits and costs associated with QFT implementation in Member States, for several reasons:</p> <ul style="list-style-type: none"> • Benefits/costs that actors (employers, trainees, authorities) are typically aware of are those of introducing and implementing traineeships per se, rather than any additional or different benefits/costs due to adapting traineeships to QFT principles. Many stakeholders reported that costs and benefits associated with the QFT 	<p>We addressed this challenge throughout the study research tasks through the following actions:</p> <ul style="list-style-type: none"> • We adapted the case study templates and the case study interview guides to add additional questions on quantifying costs and benefits following the feedback received at interim phase. • We drafted and provided additional guidance to our national experts conducting the interviews and the case study research on how to

	<p>overlap with those of traineeships in general and the QFT has not led to the emergence of new types of costs or benefits.</p> <ul style="list-style-type: none"> As noted in other chapters, awareness of QFT among relevant actors is low. Thus, even where benefits/costs can be identified, actors are unlikely to attribute them appropriately to the QFT. This is particularly true in countries, where the traineeship concept is long-established and no concrete changes have been associated with the QFT, as in the Austrian case-study, for example: "Given that the QFT has not led to any directly attributable implementation measures, no data on benefits or costs is available." Member States had traineeships in place prior to the QFT, often closely resembling what is called for in the QFT. Even where specific traineeship developments are in line with the QFT Recommendation, most stakeholders noted that they have not monitored their effect. Hence it is not usually possible to identify which, if any, elements of these developments and their benefits/costs would occur anyway, and which can be attributed to the QFT. Moreover, even where the QFT has impacted on the trainee landscape, and specific developments can be accurately attributed to the QFT, their often qualitative nature (e.g., improved clarity of contractual terms, educational objectives, rights and obligations) makes it very difficult for actors to quantify associated benefits/costs. The best that can be achieved in most cases is that they can name the benefits/costs and perhaps give some qualitative assessment of their importance. 	<p>gather costs and benefits data, in consultation with our labour economist (see attached).</p> <ul style="list-style-type: none"> We consulted regularly with our labour economist to explore all possible options for quantifying costs and benefits and ensure that the research tools were asking the right questions to gather this data. This also included suggestions on how to overcome a lack of data, through for example: "If not possible to estimate costs, can you give an indication of the amount of the costs relative to a benchmark (e.g., the average salary of someone in the level of job to which the traineeship is targeted)?" We asked the question on costs and benefits to participants of the expert meeting. We targeted specifically EU employer organisations to ensure their attendance at the validation workshop We followed up with EU employer organisations encouraging them to submit written input to the evaluation study, which they did and which we have used fully in the analysis of costs and benefits in the final report. <p>Despite the challenges, analysed the evidence from the stakeholder consultations, trainee survey and case-studies which, taken together, provide a picture of benefits and costs, largely qualitative in nature.</p>
Low level of awareness of the QFT amongst stakeholders	Throughout the consultation tasks, it became clear that there is a low level of awareness of the QFT amongst different relevant stakeholders, including PES, representatives from Ministries of Labour/Education, employer representatives on the national level, trade union representatives on the national level and individual traineeship providers.	We developed an information sheet on the QFT, explaining the objectives of the QFT, outlining the principles and the main actors involved in its implementation. This was shared with every stakeholder consulted on the EU and the national level throughout all consultation tasks.

5. Appendices

Appendix 1: Evaluation Framework

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
Current situation and developments 2014 - 2021	1. What are the most common characteristics of trainees across the 27 Member States (e.g., sex, age, education background, socioeconomic background, migrant background, ethnic minority status)? How have these developed since the baseline of 2014?	How have the characteristics of trainees evolved across the 27 Member States? since 2014? How can this be explained?	<p>Numbers of trainees across all EU27 Member States:</p> <ul style="list-style-type: none"> disaggregated by sex, age, educational background, socioeconomic status, migrant background and ethnic minority status, where possible broken down by year (2014-2021) <p>Comparison of numbers of trainees with the characteristics of the overall population of young people (e.g., proportions of male/female trainees or those with migrant background compared to those in the overall population)</p> <p>Qualitative evidence (stakeholder consultations, desk research) on the evolution of the profile of trainees over time and the reasons for the evolution</p> <p>Comparison of trainee characteristics across Member States</p>	X	X		
	2. What is the current prevalence of traineeships across the 27 Member States? In which	What is the state of play of the legal implementation of the QFT Recommendation overall and, as far as possible, by MS and sector? How has it evolved since 2014?	Numbers of trainees across the EU27, currently and over time (since 2014)	X	X	X	

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	sectors are they most prevalent and what are the typical working conditions (e.g., ALMP versus open market, duration, remuneration, social protection coverage)? How has all of this developed since the baseline of 2014?	<p>What is the state of play of the practical implementation of the QFT Recommendation overall and, as far as possible, by MS and sector? How has it evolved since 2014?</p> <p>What is the prevalence of traineeships across the 27 EU Member States and how has this evolved since 2014?? What proportions of young people take up this opportunity?</p> <p>In which sectors/occupations/types of employers (e.g., SMEs vs. large companies) are traineeships most and least prevalent and how has this evolved since 2014? Why?</p> <p>What are the typical working and learning conditions of traineeships? To what extent is remuneration offered? How have the conditions evolved since 2014?</p>	<p>Shares of young people taking up traineeship opportunities, currently and over time (since 2014)</p> <p>Estimates on the prevalence of traineeships in different sectors, currently and over time (since 2014),</p> <p>Evidence from the mapping and case studies on types of employers offering traineeships.</p> <p>Prevalence of types of working conditions of traineeships, currently and over time (since 2014)</p> <p>Qualitative evidence (stakeholder consultations, desk research) on the underlying reasons for the evolutions in the numbers and types of traineeships over time (since 2014)</p> <p>Comparative analysis across Member States</p>				
	3. What is the public debate across the 27 Member States, if any, about the role of traineeships and the importance of their quality for young people (political, civil society, representations of young people)? How has it developed since the baseline of 2014?	<p>To what degree is there public debate on the quality of traineeships and how has this evolved since 2014??</p> <p>Which stakeholders are expressing opinions on the quality of traineeships (civil society, politicians, policymakers, representatives of young people, employers/business, training providers or their representatives, social partners)? To what degree do views differ according to different types of stakeholders?</p>	<p>Existence/non-existence of public debate on the role and quality of traineeships and nature of differences across Member States</p> <p>Analysis of the sentiment expressed (positive/negative views) in the public debate on the role and quality of traineeships</p> <p>Overview of the key stakeholders engaged in public debate (e.g., civil society, politicians, policymakers, representatives of young people, employers/business, training providers or their representatives, social partners) and any marked differences of opinion</p>	X	X	X	

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
			<p>Overview of the key topics, views and focus of public debate in the 27 Member States</p> <p>Nature of the evolution in public debate over time (overall increase/decrease, increase in positive/negative views, etc.)</p> <p>Qualitative evidence (stakeholder consultations, desk research) on the reasons for the evolution of over time</p>				
Relevance	<p>4. To what extent are the principles appropriate for fostering stable labour market integration? Which principles are likely to be the most and the least important?</p>	<p>To what degree are the QFT principles appropriate for fostering stable labour market integration? Which principles make the most/least important contribution to fostering sustainable labour market integration? Why?</p>	<p>Positive/negative views from stakeholders and literature on the appropriateness of the principles for fostering stable labour market integration</p> <p>Positive/negative views from stakeholders and literature on the most/least important principles for fostering stable labour market integration</p> <p>Analysis of concrete evidence and examples (where available) from the case studies (and/or existing evaluations) of the implementation of specific principles having a particularly important role in stable labour market integration of trainees</p> <p>Evaluative judgement based on evidence collated on the alignment of the principles, and the most/least important principles, for fostering stable labour market integration</p>	X	X	X	X
	<p>5. Has the understanding of traineeship quality evolved over time? If so, how and why? How well do the principles of the QFT</p>	<p>Has the understanding of the importance and nature of quality in traineeships evolved over time? If so, how and why? What differences exist between Member States or groups of Member States? Why?</p>	<p>Existence/non-existence of changes in the understanding in traineeship quality over time</p>	X	X	X	X

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	still correspond to the needs within the EU ? How well adapted is the QFT to a post-COVID-19 world, a changing labour market and the latest perspectives of stakeholders and citizens?	<p>To what degree do the QFT principles still correspond to needs within the EU? Why?</p> <p>To what extent do the QFT principles respond to the concern that traineeships may be used to replace regular employment for young people?</p> <p>To what extent and how is the QFT adapting to developments including the impact of the Covid-19 pandemic and the changing labour market?</p> <p>To what degree is the QFT aligned with the current perspectives of stakeholders and individual citizens?</p>	<p>Existence/non-existence and types of differences between Member States</p> <p>Qualitative evidence (from stakeholders and literature) on the degree to which the QFT principles correspond to existing EU needs and concerns of stakeholders, and are adapted to recent developments</p> <p>Evaluative judgement based on evidence collated and expert opinion on the evolution of the understanding of traineeships, the degree to which the principles have corresponded to needs and continue to evolve to meet new needs in the light of key contextual changes (Covid-19, evolving labour market, new perspectives of stakeholders).</p>				
	6. Are there any additional dimensions that should have been added to the principles from the start or have in the interim proven to be lacking? How – and how likely – would such additions add to quality traineeships, and, in turn, their contribution to a stable labour market integration?	<p>Are there any dimensions or elements that should have been added to the QFT principles from the start or have since been shown to be lacking? If so which and why?</p> <p>To what extent would a principle related to remuneration of trainees improve the quality of traineeships? Would there be any adverse effects of such a principle?</p> <p>What contributions would such new elements be likely to make to improving the quality of traineeships and stable labour market integration?</p>	<p>Qualitative evidence (from stakeholders and literature) on elements missing from the principles and views on potential new additions</p> <p>Qualitative evidence (from stakeholders and literature) on contributions of new elements of the principles to improving the quality of traineeships and subsequent stable labour market integration</p> <p>Evaluative judgement based on evidence collated and expert opinion on dimensions missing from the current principles, potential new additions, and the potential impact of any changes to the principles</p>	X	X	X	X

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	7. With due respect to the principle of subsidiarity, how well does the nature of the QFT as a (non-binding) Council Recommendation correspond to the needs and the socio-economic problems to be solved? Has this changed over time, and are their significant differences between Member States?	<p>To what extent does the QFT's status as a non-binding framework correspond to the needs and socio-economic problems to be tackled?</p> <p>Has this changed over time and in light of any evolutions in needs or changes in the socio-economic context?</p> <p>What differences exist between Member States and why?</p>	<p>Qualitative evidence (from stakeholders and literature) on the appropriateness of the non-binding status of the QFT for meeting needs and resolving problems</p> <p>Analysis of the nature of the evolution of perspectives over time</p> <p>Analytical overview of differences between Member States</p> <p>Evaluative judgement based on evidence collated and expert opinion (including legal expertise) on the suitability of the non-binding nature of the QFT to meet needs</p>	X	X	X	
Effectiveness	8. To what extent have the principles of the QFT been enshrined in national legislation and/or national quality frameworks since 2014? To what extent did they already exist? What is the scope of current national legislative frameworks and national quality frameworks?	<p>To what extent have the principles of the QFT been enshrined in and/or influenced national legislation/quality frameworks since 2014?</p> <p>Which principles in particular and why?</p> <p>What types of legal implementation tools/regulatory approaches have been used by Member States to enshrine the principles of the QFT?</p> <p>To what extent and which principles were already enshrined in national legislation/frameworks before 2014?</p> <p>To what extent are traineeships defined in current national legislation/frameworks?</p>	<p>Legal analysis of the transposition (or non-transposition) of the QFT principles into national legislation since 2014</p> <p>Legal analysis of the transposition (or non-transposition) of the QFT principles into national quality frameworks since 2014</p> <p>Evidence of the existence of quality frameworks corresponding to the QFT before 2014</p> <p>Analytical overview of the scope of current national legislative frameworks and quality frameworks on both ALMP and open market traineeships</p> <p>Evaluative judgement based on evidence collated and expert opinion (including legal expertise) on the degree to</p>	X	X	X	x

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
		<p>What is the scope and content of current national legislative frameworks and national quality frameworks in relation to traineeships? To what degree do they cover all the principles? Which principles are most covered and which least? Why?</p> <p>What have been the <u>obstacles</u> to the full transposition and implementation of the QFT in Member States?</p>	<p>which the QFT has been enshrined in national legislation and frameworks</p> <p>Evidence from interviews and meetings of the types of obstacles faced by Member States in transposing QFT principles.</p>				
	9. To what extent do enforcement and/or regular follow-up monitoring exist and to what extent do they confirm an adherence to national legislation and/or national quality frameworks and/or the overarching QFT? Is there evidence of adverse effects too?	<p>Have enforcement and/or regular monitoring mechanisms been put in place to facilitate compliance with national legislation/quality frameworks and/or the QFT?</p> <p>What types of mechanisms can be found, and how do they differ across the Member States?</p> <p>Where they exist, how effective have they been in ensuring compliance? Which mechanisms have been most/least effective, and why?</p> <p>Is there any evidence of any adverse effects of enforcement/monitoring? If so which and why?</p>	<p>Legal analysis of the existence/non-existence and nature of enforcement measures to ensure compliance to national legislation/quality frameworks and/or the overall QFT</p> <p>Legal analysis of the existence/non-existence and nature of regular follow-up/monitoring mechanisms to ensure compliance to national legislation/quality frameworks and/or the overall QFT</p> <p>Qualitative evidence (from stakeholders and desk research) on the effectiveness of such mechanisms in ensuring compliance</p> <p>Qualitative evidence (from stakeholders and desk research) on any adverse effects</p> <p>Evaluative judgement based on evidence collated and expert opinion (including legal expertise) on the effectiveness of enforcement, follow-up and monitoring arrangements</p>	X	X	X	x

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	10. What is the impact on trainees ? How effective do (ex-)trainees perceive traineeships (and/or specific legislative frameworks and/or specific national quality frameworks) to be in terms of facilitating a stable labour market integration for young people, and contributing to youth employment? Is there evidence of adverse effects too?	<p>What has been the impact of the implementation of the QFT on trainees?</p> <p>Which specific elements of QFT implementation (specific principles, enforcement/follow-up measures, etc.) have had the most positive impacts on trainees and their stable labour market integration? Why?</p> <p>To what degree do trainees (or ex-trainees) consider that the frameworks and principles governing traineeships (e.g., specific national legislation or quality frameworks and/or specific aspects of them) can be in facilitating stable labour market integration and fostering youth employment? Which elements/principles are of particular importance from their perspective? Why?</p> <p>Are there additional principles that would enhance the quality of traineeships?</p> <p>Has the way in which the QFT been implemented (e.g., specific principles or measures) had any adverse/negative effects on trainees? If so which and why?</p>	<p>Qualitative evidence (from stakeholders, case studies, surveys and literature) on the degree and nature of impacts (e.g., employability, skills development, development of transversal competences, development of social networks, etc.) of QFT implementation on trainees</p> <p>Qualitative evidence (from stakeholders, case studies, surveys and literature) on the degree and nature of impacts on trainees of specific aspects of QFT implementation (e.g., specific principles, enforcement/follow-up measures, etc.)</p> <p>Any quantitative evidence (e.g., from case studies) on the impacts of QFT implementation on young people e.g., access to stable employment, further education and training, etc.</p> <p>Qualitative evidence (from stakeholders, surveys and literature) on any adverse effects of the implementation of the QFT principles</p> <p>Views of trainees (and ex-trainees) (and/or their representatives) on the effectiveness of QFT implementation in facilitating stable labour market integration and fostering youth employment (particularly via the survey of trainees, but also the public consultation)</p> <p>Views of trainees (and ex-trainees) on any adverse effects of QFT implementation (particularly via the survey of trainees, but also the public consultation)</p> <p>Evaluative judgement based on evidence collated and expert opinion regarding the impact of the different aspects</p>	X	X	X	X

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
			of QFT implementation (e.g., specific principles, enforcement/follow-up measures, etc.) on trainees				
	11. How equally are the effects of the QFT, by way of national legislative frameworks and/or national quality frameworks, distributed within Member States? Are there sectors or (social) sub-groups for which the QFT has proven to be particularly successful or unsuccessful?	<p>To what degree are the effects of the implementation of the QFT principles (by way of national legislative frameworks and/or national quality frameworks) distributed equally <i>within</i> Member States?</p> <p>Is the QFT particularly successful or unsuccessful for specific economic sectors or target groups? If so, which and why?</p> <p>What has been the impact of QFT implementation on <u>traineeship providers/employers</u>? Have specific elements of QFT implementation had particularly positive or negative impacts and why?</p>	<p>Qualitative evidence (from stakeholders and literature) on the equal distribution of effects of the QFT within Member States</p> <p>Quantitative evidence (where available) on the existence of traineeships in different sectors and for different target groups</p> <p>Qualitative evidence (from stakeholders, literature and surveys) on sectors and sub-groups in which the QFT has been particularly successful/unsuccessful</p> <p>Views of employer representatives on the impact of QFT implementation on employers/traineeship providers (from interviews and case studies)</p> <p>Evaluative judgement based on evidence collated and expert opinion on the impact and effectiveness of QFT implementation across sectors and sub-groups</p>	X	X	X	X
	12. How do observed developments since the baseline of 2014 compare against the developments that were expected to be achieved when the QFT was developed/proposed?	<p>To what degree do the developments since 2014 correspond to the expectations for the QFT when it was developed? How and in what ways?</p> <p>Which expectations of the QFT have not been met and why?</p>	<p>Desk-based analysis on the degree to which the identified developments regarding the implementation and impacts of the QFT correspond to original expectations (based on key documents including the Council Recommendation and the underpinning impact assessment⁵)</p> <p>Qualitative evidence (from stakeholders and literature) on the degree to which the identified developments correspond</p>	X	X	X	

⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013SC0495&qid=1622466549066&from=EN>

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
			to original expectations, as well as the expectations that have not been met and why Evaluative judgement based on evidence collated and expert opinion on the degree to which QFT implementation has met the original expectations				
	13. While taking into account the differences in objectives and target groups, has one of the two quality frameworks, the QFT or the EFQEA , been more effective in improving the quality of traineeships and apprenticeships respectively, as well as the employability of trainees and apprentices, and why?	Accounting for the differences in target groups and objectives, has the QFT been more or less effective than the EFQEA in terms of improving the quality of traineeships/apprenticeships respectively? In what ways and why? Has the QFT been more or less effective than the EFQEA in terms of improving the employability of trainees/apprentices respectively? In what ways and why?	Qualitative evidence (from stakeholders and literature) on the effectiveness of the QFT and the EFQEA in improving the quality of traineeships/apprenticeships (respectively) Qualitative evidence (from stakeholders and literature) on the effectiveness of the QFT and the EFQEA in improving the employability of trainees/apprentices (respectively) Review of any comparative quantitative evidence on the employability of trainees/apprentices (respectively) Evaluative judgement based on the qualitative and quantitative evidence collated and expert opinion (including our experts working on the Apprenticeship Support Services), taking into account the differences in objectives and target groups, on the relative effectiveness of the QFT and EFQEA	X	X	X	
Efficiency	14. What was the quantifiable administrative burden associated with the adequate implementation of the QFT for the different stakeholders at various levels (national, regional,	What was the nature of the administrative burden associated with the adequate implementation of the QFT (e.g., transposition of QFT principles, enforcement/follow-up monitoring and other compliance checks)? What was the quantifiable administrative burden (i.e., administrative costs generated	Quantitative (or quantifiable) evidence from stakeholders at national, regional and local stakeholders on the administrative burden associated with QFT implementation (e.g., additional staff time and training for implementation, enforcement and monitoring, etc.)	X	X	X	x

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	local), in terms of e.g., transposition of QFT principles, enforcement/follow-up monitoring and other compliance checks?	<p>by the EU intervention, in addition to the already existing administrative costs) for different stakeholders at various levels (national, regional, local) in implementing the QFT?</p> <p>What types of adjustment costs (e.g., staff costs for supporting trainees, setting learning objectives, etc.) were there in implementing the QFT? Can any of these adjustment costs be quantified? Which stakeholders incurred these costs?</p>	<p>Administration expenditure data on ALMPs that offer traineeships within the scope of the QFT from public employment services, as available</p> <p>Qualitative evidence from stakeholders at national, regional and local stakeholders on the nature of the administrative burden associated with QFT implementation</p> <p>Evidence from stakeholders on the relative size and nature of the adjustment costs incurred to implement the QFT.</p> <p>Economic analysis and evaluative judgement based on the data collected to ascertain the quantifiable administrative burden of the implementation and enforcement of the QFT</p>				
	15. To what extent have Member States encouraged or enabled traineeship prevalence and improved quality through financial incentives ? Have any EU programmes (such as the YEI and ESF) contributed directly or indirectly to financial incentives?	<p>What type of financial incentives have been put in place by Member States to increase the prevalence of traineeships and improve their quality?</p> <p>To what extent are financial incentives in place across the EU27?</p> <p>Have any EU programmes (such as the YEI or ESF) contributed to these financial incentives, either directly or indirectly?</p>	<p>Evidence (from the desk research/stakeholder consultations/case studies) on the existence, nature, and monetary value of financial incentives in different Member States (e.g., for case study countries, the estimated total amount spent on financial incentives that aimed to increase prevalence or quality.)</p> <p>Evidence (from the desk research/stakeholder consultations/case studies) on the contribution of EU programmes to financial incentives</p> <p>Evaluative judgement based on the evidence collated and expert opinion on the existence and nature of financial incentives in different Member States, and the contributions of EU programmes to such incentives</p>	X	X	X	

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				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	16. What can be approximated in terms of quantifiable benefits for young people ? Are there other quantifiable benefits for society at large that could be linked back to the QFT?	<p>What approximation can be made of the quantifiable benefits that can be linked to QFT implementation for young people?</p> <p>What approximation can be made of the quantifiable benefits for employers?</p> <p>Are there other quantifiable benefits which can be approximated linked to the QFT for wider society? If so, which?</p>	<p>Evidence (from the desk research/stakeholder consultations (in particular trainee survey/case studies) on the quantifiable benefits of QFT implementation for young people e.g., the increase in the proportion of traineeships/traineeship providers offering traineeships that give clear and improved educational objectives and working conditions, such as meeting minimum holiday entitlements and certification of skills</p> <p>Evidence (from the desk research/stakeholder consultations/case studies) on the quantifiable benefits of QFT implementation for employers (e.g., by improving their reputation as quality traineeship providers/providing them with a more diverse, young workforce/resulting in tax exemptions/reductions and/or access to subsidies?</p> <p>Evidence (from the desk research/stakeholder consultations/case studies) on the quantifiable benefits of QFT implementation for society at large e.g., a fall in youth unemployment/inactivity and associated reductions in welfare payments and increases in tax revenue).</p> <p>Economic estimation (where possible) of the value of quantifiable benefits of QFT implementation</p>	X	X	X	
	17. What are the main obstacles preventing employers from offering traineeships? What kind of support would be necessary to overcome these obstacles?	<p>What are the main obstacles preventing employers from offering quality traineeships?</p> <p>What are the main reasons that employers offer quality traineeships?</p> <p>To what degree are the obstacles to offering quality traineeships addressed by the QFT? Are there any additional principles that if</p>	<p>Qualitative evidence (from desk research/stakeholder consultations/case studies) on the main obstacles for employers and the degree to which they are addressed by the QFT</p> <p>Qualitative evidence (from desk research/stakeholder consultations/case studies) on the support needed to overcome the obstacles for employers</p>	X	X	X	x

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
		added to the QFT would increase or reduce these obstacles? What kind of further support would help overcome these obstacles?	Evaluative judgement based on the evidence collected and expert opinion on the main obstacles stopping employers from offering traineeships, and the support need to overcome these obstacles				
	18. To what extent are the administrative costs proportionate to the assessed benefits of QFT implementation? What has been the cost-effectiveness and how/why does it vary across the 27 Member States? What factors influenced the efficiency and how did they do so?	To what extent are the administrative costs proportionate to the benefits of QFT implementation? What has been the cost-effectiveness of QFT implementation? To what degree does cost-effectiveness vary across the 27 Member States? In what ways and why? What factors influenced the efficiency of QFT implementation? In what ways and why?	Assessment of the proportionality of costs to benefits, based on the evidence collated on administrative burden (costs) and benefits Assessment of the cost-effectiveness of the implementation of the QFT Identification and analysis of any differences in cost-effectiveness across the 27 Member States Qualitative evidence (from desk research/stakeholder consultations/case studies) on the factors which influenced the efficiency of QFT implementation	X	X	X	x
	19. Is there scope for reducing administrative burden without undermining the assessed benefits of QFT implementation? In other words, could benefits have been achieved at lower cost?	Could the observed benefits have been achieved at a lower cost? In what ways? Is there scope to reduce the administrative burden without reducing the benefits of QFT implementation?	Qualitative evidence (from desk research/stakeholder consultations/case studies) on the scope to reduce administrative burden without diminishing the returns (benefits) Evaluative and economic judgement based on the evidence collated and expert opinion on the scope for reducing costs while maintaining the benefits	X	X	X	
Coherence	20. To what extent have the objectives, target groups and measures	To what degree has implementation of the QFT within ALMPs been coherent with national and regional education, training,	Text-based analysis on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant national and regional education,	X	X	X	

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	to implement the QFT within the context of ALMPs been coherent with education and training, employment and social policies at national and regional level? How about open market traineeships ?	<p>employment and social policies in terms of (a) objectives, (b) target groups and (c) measures?</p> <p>To what degree has implementation of the QFT within open market traineeships been coherent with national and regional education, training, employment and social policies in terms of (a) objectives, (b) target groups and (c) measures?</p> <p>Are there differences across Member States? If so, why?</p>	<p>training, employment and social policies, targeting young people (e.g., Youth Guarantee, activation measures for young people, etc.)</p> <p>Qualitative evidence (from national/regional stakeholder consultations/case studies/public consultation) on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant national and regional education, training, employment and social policies</p> <p>Qualitative evidence (from desk-research/stakeholder consultations/case studies) on the extent of coherence with open market traineeships</p> <p>Evaluative judgement on the basis of evidence collated, including assessment of (level of) complementarities, synergies, overlaps and contradictions</p>				
	21. Linked to the former, to what extent do the QFT support and usefully complement other policies (in particular those pursued at national level)? What is the level of complementarity or duplication?	<p>To what degree does the QFT support and complement other policies, particularly at national level? In what ways? Are there any conflicts?</p> <p>What is the level of complementarity or duplication?</p> <p>Are there differences across Member States? If so, why?</p>	<p>Text-based analysis on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant national and regional education, training, employment and social policies</p> <p>Qualitative evidence (from national/regional stakeholder consultations/case studies) on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant national and regional education, training, employment and social policies</p> <p>Evaluative judgement on the basis of evidence collated, including assessment of (level of) complementarities, synergies, overlaps/duplication and contradictions</p>	X	X	X	

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	22. To what extent have the objectives, target groups and measures to implement the QFT within the context of ALMPs been coherent with the relevant EU initiatives listed in section 2.3? How about open market traineeships ?	<p>To what degree has the implementation of the QFT (objectives, target groups and measures) been coherent with relevant EU initiatives including relevant Commission Communications (e.g., Youth Employment Support: a Bridge to Jobs for the Next Generation⁶) or Recommendations (e.g., Effective Active Support to Employment (EASE)⁷ or strategies (e.g., European Youth Strategy⁸), financial instruments (e.g., ESF, YEI, Erasmus+), other programmes/measures (e.g., EURES, European Solidarity Corps, the reinforced Youth Guarantee), etc.?</p> <p>Are there differences across Member States in the degree of complementarity with EU initiatives? If so, why?</p>	<p>Text-based analysis (based on legal texts) on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant EU initiatives</p> <p>Qualitative evidence (from stakeholder and public consultations) on the extent of external coherence between QFT implementation (objectives, target groups, measures) and relevant EU initiatives</p> <p>Evaluative judgement on the basis of evidence collated, including assessment of (level of) complementarities, synergies, overlaps/duplication and contradictions</p>	X	X	X	
EU added value	23. What is the additional value resulting from the QFT compared to what could reasonably have been expected from Member States acting at national and/or regional levels ?	<p>What additional value has been generated from the QFT at the European level compared to what could reasonably be expected by Member States acting alone at national/regional levels?</p> <p>To what degree is/was work already being done at national level to improve the quality and prevalence of traineeships (outside the scope/influence of the QFT)?</p>	<p>Qualitative evidence (from desk research/stakeholder and public consultations/case studies) on added value</p> <p>Quantitative evidence (where available) on added value</p> <p>Evaluative judgement and expert opinion on the basis of evidence collated</p>	X	X	X	X

⁶ <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1594047420340&uri=CELEX%3A52020DC0276>

⁷ <https://ec.europa.eu/social/main.jsp?langId=en&catId=89&furtherNews=yes&newsId=9939#navItem-3>

⁸ https://europa.eu/youth/strategy_en

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
		<p>What type of added value has been generated? For example:</p> <ul style="list-style-type: none"> To what degree has the QFT led to more quality traineeships being implemented (volume effects)? To what degree has the QFT broadened the focus of existing national/regional measures to include new areas or new target groups (scope effects)? To what degree has the QFT led to structural changes in employment/education/training policy or frameworks at national level (role effects)? Is there evidence of benefits to organisations implementing frameworks or delivering traineeships (training providers, employers, PES, monitoring bodies) from being involved in QFT implementation (process effects)? <p>To what degree has the Recommendation contributed to creating a 'level playing field' amongst Member States (upward convergence)?</p>	Expert opinion based on evidence collected on degree of convergence of Member States' regulatory approaches to traineeships since 2014.				
	24. What would be the most likely consequences of discontinuing the QFT at EU level , and what would be the most likely prognosis for a no-policy-change scenario of	<p>What would be the most likely consequences of:</p> <ul style="list-style-type: none"> (a) Discontinuing the QFT at EU level? (b) Continuing QFT implementation as under current policy <p>Which stakeholders would be likely to be affected, in what ways and why?</p>	<p>Qualitative evidence (from desk research/stakeholder and public consultations/case studies) on the consequences of the two policy choices in terms of stakeholders affected and impact on traineeships and their quality</p> <p>Evaluative judgement and expert opinion on the basis of evidence collated</p>	X	X	X	

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

				Tasks			
Evaluation criteria	Main research questions (as specified in the tender specifications)	Sub-questions	Potential judgement criteria / indicators	Targeted consultations	Mapping	Case studies	Public consultation
	continuing the QFT as it stands?	<p>What would be the probable impact on the quality and offer of traineeships? Why?</p> <p>What would be the likely negative and positive effects?</p>					

Appendix 2: Consultation strategy

Background information

The consultation strategy is part of study supporting the evaluation of the 2014 Council Recommendation on a Quality Framework for Traineeships (QFT), to be carried out by the European Commission, as stated in the 4 March 2021 European Pillar of Social Rights Action Plan. The QFT, introduced as part of a comprehensive package of measures aiming to tackle the youth employment crisis of 2012-2013, provides a common framework for Member States and key stakeholders in the EU on the key components and principles underpinning quality traineeships for young people. The framework comprises 22 principles for Member States, grouped across 10 key dimensions and applies to traineeships taking place in the open market, as well as part of Active Labour Market Policies (ALMPs).

The study will directly feed into the evaluation that will support the European Commission's 2022 review of the QFT through gathering primary and secondary evidence on the degree of implementation of the QFT in Member States. The in-depth analysis of the evidence gathered will assess the extent to which the 2014 Council Recommendation on the QFT is effective, efficient, coherent, brings EU added value and is relevant to current needs, through: evaluating the effectiveness of the actions taken in response to the QFT by Member States, and examining the transposition of the principles of the QFT into national legislation, the level of enforcement and monitoring, as well as the impact on the quality of traineeships. The study will cover all 27 Member States.

The study comes at an important time for focusing on young people's school-to-work transition. The Covid-19 pandemic has brought about new challenges for young people's access to the labour market. These new challenges, coupled with the changes already underway in the labour market due to the digital and green transitions, have made it even more important for governments to ensure that young people have access to quality traineeships that increase their employability and provide a real stepping-stone into decent and sustainable work. The EU continues to be committed to this policy area. This study will thus serve the broader purpose of providing EU and national policymakers with evidence on what has worked so far in implementing the QFT to guide the current and future development of EU and national policies on traineeships and youth employment measures.

An Inter-Service Steering Group, comprising of representatives from various Directorate-Generals of the European Commission, has been established to oversee and provide expertise throughout the different stages of the study.

Consultation scope and objectives

This stakeholder consultation is an overarching document setting out the plan for the consultation process to support the study. In line with the Better Regulation Guidelines, the consultation strategy aims to reach out to the wide variety of stakeholders involved in policy making and in the implementation of the types of measures outlined in the QFT, in order to gather their views and opinions on the effectiveness, efficiency, coherence, relevance and EU added value of the QFT and the progress made towards its implementation.

The consultation strategy covers stakeholders in all 27 Member States and aims to ensure that opinions of the general public, young trainees, as well as the relevant stakeholder groups are well reflected. The process will include a public consultation as well as targeted consultation. The results will be reflected in further Commission reporting and planning.

Mapping of stakeholders

The stakeholder groups that have a link to the design, implementation, and monitoring of the QFT or that were the target group of traineeships schemes were determined.

The following stakeholder groups have been identified:

- **EU level institutions/policymakers** and other organisations responsible for employment and labour market policy, such as DG EMPL, DG EAC, Eurofound;
- **National and regional ministries responsible for employment, training, education and labour market policy**, including implementation of the Quality Framework for Traineeships. Examples include Ministries of: Employment and Social Affairs; Education; Finance. The aim of consulting them is to obtain direct insights into the oversight, implementation, monitoring and funding of measures and initiatives linked to the 22 principles of the QFT.
- **Other national and regional public institutions responsible for employment, training, education and labour market policy**, including monitoring and implementation of the Quality Framework for Traineeships. Examples include Public Employment Services and Labour inspectorates. The purpose of consulting them is to obtain direct insights into the oversight, implementation, monitoring and funding of measures and initiatives linked to the 22 principles of the QFT.
- **Social and economic partners at EU and national level**, including EU business organisations and trade unions, national/regional social partners and chambers of commerce. Examples include Business Europe and the European Trade Union Confederation. The aim of consulting these organisations is to understand the perspective of trade unions and employer representatives on all dimensions of the study.
- **Organisations representing young people and trainees and/or specific target groups** such as civil society organisations and umbrella networks at EU, national and regional level. Examples include the European Youth Forum, Génération Précaire, Repubblica Degli Stagisti and Fair Internships Initiative, and National Youth Councils. The purpose of consulting these organisations is to understand the perspective of the stakeholders that are involved in the implementation or linked to the monitoring of the QFT to feed into all aspects of the study.
- **Current, former and potential trainees** to obtain direct insight on the extent to which the QFT and its 2022 principles have had an impact on young people and quality traineeships.
- **Research/academia focusing on youth employment, training, education and labour market policy**, such as the International Labour Organization (ILO), and the Organisation for Economic Cooperation and Development (OECD). The aim of consulting them is obtaining further insights from the research perspective into all dimensions of the study.
- **EU citizens and any interested parties** responding on their own behalf to enable interested individuals to provide their perspectives on the QFT.

Selection of consultation activities & their accessibility

The consultation format and questions of each consultation activity will be tailored to the various stakeholder groups. The questions will address the evaluation criteria set out in the European Commission's Better Regulation Guidelines (effectiveness, efficiency, coherence, relevance, and EU added value). The consultation will be undertaken through the following activities:

- A 12-week, internet-based **public consultation** (Task 4) will be carried out in conformity with the Better Regulation Guidelines as part of the evaluation process. The public consultation will be conducted using the EU Survey tool and will be available on the public consultation pages of the Commission. The questionnaire will be available in 24 official EU languages and responses will be accepted in 24 official EU languages. The public consultation will provide an open channel through which any stakeholder will feed into the evaluation going beyond those we will address in the targeted consultations. It will address aspects of the key evaluation criteria (i.e., effectiveness, efficiency, relevance, coherence, and EU added value) and will give an opportunity to all interested stakeholders to provide their inputs into the topics covered by the evaluation. The public consultation will include the possibility to submit a position paper.
- **Targeted interviews with EU and national level stakeholders** will be carried out. The interviews will focus on the following types of stakeholders:
 - EU level stakeholders directly and indirectly linked to youth employment policies and quality traineeships, with a particular focus on EU level representative organisations, including relevant EU level social and economic partners. These will include, among others, policy makers from the European Commission, Eurofound, the EU level social partner organisations including Business Europe and the European Trade Union Confederation, and relevant EU civil society organisations, such as the European Youth Forum.
 - National (and/or regional) level stakeholders responsible for designing, implementing, monitoring or ensuring compliance with national legislative frameworks and/or national quality frameworks for traineeships (Task 1.1), including social partners and youth organisations.
- An **internet-based survey** targeted at trainees and potential trainees across the EU (Task 1.2), which will gather evidence on their experiences of traineeships to contribute to all evaluation questions, in particular those on the impact and relevance of the QFT on trainees.
- **Online expert meeting** with selected representatives of national (and regional) authorities in charge of traineeship (quality) frameworks and with academic experts (Task 1.3), through which we will gather evidence and opinions on the current situation in terms of traineeships across the EU, the main developments since 2014 and the level of adequate QFT implementation across Member States.
- **Online validation workshop** to present and discuss the preliminary findings of the study. The workshop participants will be encouraged to provide their feedback to the draft conclusions and recommendations of the study and share their views on the lessons learnt (Task 1.4).

Stakeholder views will also be gathered through **focus groups** carried out in the context of specific individual case studies, which will provide a comprehensive assessment of the implementation of the QFT and the current situation of traineeships in selected Member States. The focus groups will provide an opportunity to consult with trainees and obtain insights on their experience (Task 3).

A consultation synopsis report, which summarises the activities, methods and findings of the entire consultation activities, including responses to the roadmap, will be produced, in line with the requirements of the Better Regulation Guidelines and Toolbox (Tool #55). The synopsis report will be an annex of the draft final report of the study. A factual report presenting the main features and results from the public consultation will also be produced and delivered in the interim report part II.

Overview of consultation activities by stakeholder group and indicative timing

Table 10 Consultation activities by stakeholder group and timing

Type of stakeholder	Public consultation	Interviews	Trainee survey	Case studies	Expert meeting	Validation workshop
	Q1 2022			Q2-Q3 2022	Q2 2022	Q3 2022
EU institutions/policymakers responsible for employment and labour market policy		X				X
National and regional ministries responsible for employment, training, education and labour market policy	X	X		X	X	X
Other national and regional public institutions responsible for employment, training, education and labour market policy (e.g., PES)	X	X		X	X	X
Social and economic partners at EU and national level (e.g., trade unions, employer organisations, chambers of commerce)	X	X		X	X	X
Individual employers	X			X		
Civil society organisations representing young people, trainees and precarious workers	X	X		X	X	X
Research/academia focusing on youth employment, training, education and labour market policy	X	X		X	X	

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Trainees and potential trainees	X		X	X		
EU citizens and any other interested parties	X					

Appendix 3: Questionnaire for the public consultation

The European Commission invites you to take part in a public consultation on the Council Recommendation on a Quality Framework for Traineeships (QFT)⁹ adopted in 2014. The QFT aims to help young people transition from education, unemployment or inactivity into work through quality traineeships that increase their skills and allow them to gain work experience. This public consultation is part of an evaluation on how useful the QFT has been and whether it is still fit for purpose.

A 'traineeship' is a limited period of work practice, whether paid or not, which includes a learning and training component. The QFT focuses on traineeships offered as part of Active Labour Market Policies, as well as those offered by different employers on the open labour market. It does not apply to work experience placements that are part of curricula of formal education or vocational education and training nor traineeships regulated under national law and whose completion is a mandatory requirement to access a specific profession (e.g., medicine, architecture, etc.).

The QFT is structured around the following 10 principles:

1. Conclusion of a written agreement - outlining the educational objectives, working conditions and rights and responsibilities of both parties;
2. Learning and training objectives – in line with the tasks given; and guidance by a supervisor;
3. Working conditions applicable – respecting EU/national law and clarifying any coverage by health and accident insurance, entitlement to sick leave as well as an allowance or compensation, and if so, the amount;
4. Rights and obligations – of the trainee and the traineeship provider;
5. Reasonable duration – in principle up to 6 months;
6. Recognition and validation of the skills and competences acquired, through a certificate;
7. Transparency – on working conditions in vacancy notices, including whether an allowance and/or compensation is offered;
8. Cross-border traineeships – facilitated by reducing administrative formalities;
9. Use support from European Structural and Investment Funds to implement the QFT;
10. Involvement of social partners, employment services, educational institutions and training providers in the implementation of the QFT.

The views that you express in this consultation will be analysed as part of the evaluation. The Commission will publish a summary report on the consultation website after the end of the consultation period. In addition to this public consultation, another survey targeting (prospective) trainees was held recently.

All citizens, organisations and public authorities are encouraged to respond to the consultation via this online questionnaire.

If you are from an organisation which operates at national or regional level (e.g., national training or youth organisation), you should answer the questions relating to your own country. If you are from an organisation which works at EU level (e.g., EU level NGOs, EU level social partners) you should answer the questions in relation to the EU as a whole. All individual citizens should respond in relation to their country of residence.

About you

A. First name _____

B. Surname _____

⁹ <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1411116781313&uri=CELEX:32014H0327%2801%29>

- C. Email (this won't be published) _____
- D. Language of my contribution [drop down list of all EU languages]
- E. I am giving my contribution as:
- ☐ Academic/research organisation **ORGANISATION**
 - ☐ Business association **ORGANISATION**
 - ☐ Company/business organisation **ORGANISATION**
 - ☐ Consumer organisation **ORGANISATION**
 - ☐ EU citizen **INDIVIDUAL**
 - ☐ Environmental organisation **ORGANISATION**
 - ☐ Non-EU citizen **INDIVIDUAL**
 - ☐ Non-governmental organisation (NGO) **ORGANISATION**
 - ☐ Public authority **ORGANISATION**
 - ☐ Trade union **ORGANISATION**
 - ☐ Other
- F. **[If E= INDIVIDUAL]**
- ☐ Age < 30
 - ☐ Age => 30
- G. **[If E= Business association/Company/business organisation] Scope**
- ☐ Agriculture, forestry & fishing
 - ☐ Industry (except construction)
 - ☐ Construction
 - ☐ Wholesale & retail trade, transport, accommodation & food
 - ☐ Information & communication
 - ☐ Financial & insurance activities
 - ☐ Professional, scientific & technical activities
 - ☐ Public administration
 - ☐ Education
 - ☐ Health & social work

- ☐ Arts, entertainment & recreation
- ☐ Other [Free text – maximum 30 characters]

H. **[If E=public authority]** Scope

- ☐ International
- ☐ Local
- ☐ National
- ☐ Regional

I. **[If H=national]** Level of governance

- ☐ Parliament
- ☐ Ministry
- ☐ Authority
- ☐ Agency
- ☐ Other

J. **[If E=ORGANISATION]** Organisation name

K. **[If E=ORGANISATION]** Organisation size

L. **If E=ORGANISATION]** Transparency register number

M. Country of origin

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected.

L. Contribution publication privacy settings

[If E=ORGANISATION]

Anonymous: The 'type of respondent' that you responded to this consultation as, your country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself.

Public: Your name, the type of respondent that you responded to this consultation as, your country of origin and your contribution will be published.

[if E=INDIVIDUAL]

Anonymous: Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public: Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☐ I agree with the personal data protection provisions

M. I am responding to this questionnaire in reference to:

- ☐ My country of residence
- ☐ The EU as a whole
- ☐ Other... please specify [free text]

N. **[IF E= ORGANISATION]** Can you specify further the capacity in which you are replying to this questionnaire?¹⁰

- ☐ Government body / Ministry – **GROUP I** and **GROUP IV**
- ☐ Other public authority (national, regional, etc.) **GROUP I** and **GROUP IV**
- ☐ Employment service **GROUP I** and **GROUP IV**
- ☐ Vocational Education and Training / Higher Education institution **GROUP I** and **GROUP IV**
- ☐ Other training institution **GROUP I** and **GROUP IV**
- ☐ Private enterprise **GROUP I**, **GROUP IV**, and **GROUP V**
 - Enterprise offering traineeships ☐ Yes / ☐ No
- ☐ Research or academic organisation **GROUP I** and **GROUP IV**
- ☐ Non-governmental organisation, platform or network **GROUP I** and **GROUP IV**
 - ☐ youth organisation
 - ☐ organisation representing precarious workers
 - ☐ organisation representing vulnerable groups
 - ☐ other
- ☐ Social partner **GROUP I** and **GROUP IV**
 - ☐ trade union
 - ☐ employer organisation
- ☐ Other [Free text box] **GROUP I** and **GROUP IV**

O. **[Display if E= INDIVIDUAL]** Are you (please select the answer that fits best):

¹⁰ GROUP I – ALL RESPONDENTS,
 GROUP II – INDIVIDUAL TRAINEES/POTENTIAL TRAINEES,
 GROUP III – ALL RESPONDENTS EXCEPT INDIVIDUAL TRAINEES/POTENTIAL TRAINEES,
 GROUP IV – ALL ORGANISATIONS,
 GROUP V – BUSINESS/EMPLOYERS

- ☐ Jobseeker (registered or not) and not in education or training **GROUP I** and **GROUP II**
- ☐ Jobseeker (registered or not) in education or training **GROUP I** and **GROUP II**
- ☐ Not looking or not available for work and not in education or training **GROUP I** and **GROUP II**
- ☐ Trainee (current or former) **GROUP IIA**
 - My current/most recent traineeship is/was supported by an employment service
 - My current/most recent traineeship is/was part of an education or training programme
 - Neither of the above
- ☐ Prospective trainee / Interested in doing a traineeship **GROUP IIB**
- ☐ Individual working in an organisation providing traineeships **GROUP I, GROUP III, GROUP IV** and **GROUP V**
 - Management role
 - Non-management role
- ☐ Other [Free text box] **GROUP I**

P. **[Display if O=** Trainee (current or former) **GROUP IIA)** Has one (or more) of your traineeships been, at least partly, abroad?

- ☐ Yes
- ☐ No

[Relevance]

1. **[GROUP I – ALL RESPONDENTS]** How important are the following principles for **increasing the quality of traineeships** in your country/the EU?

Aspect of traineeship	Principle	Very important	Important	Not very important	Not important at all	I do not know
Agreement between trainee and provider	Concluding a written agreement at the beginning of the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Defining learning and training objectives	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Having a designated supervisor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Defining working time, rest and holiday periods in the traineeship agreement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Defining health coverage, accident insurance and sick leave in the traineeship agreement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Providing information on whether a compensation is paid (and its amount)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Defining trainee's and traineeship provider's rights and obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Defining the traineeship duration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Limiting the traineeship duration to 6 months	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Defining the way to extend or terminate the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regarding traineeship providers	Carrying out an assessment of the trainee's progress after traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Providing a certificate upon completion of the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Ensuring vacancy notices give information on remuneration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Ensuring vacancy notices give information on the chances of being hired after the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Governance of traineeships	Establishing clear rules on cross-border traineeships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Using EU funds to support the number and quality of traineeships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	The involvement of social partners and other stakeholders in the implementation of traineeships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2. **[GROUP I – ALL RESPONDENTS]** Would any of the following **additional** principles increase the quality of traineeships?

Principles	To a large extent	To a moderate extent	To a small extent	Not at all	Do not know
Ensuring trainees are paid	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring support in kind (e.g., vouchers for food)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring trainees are reimbursed for travel costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring reimbursement of housing costs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring compensation for overtime	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring access to sickness and health care benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring access to maternity/paternity/parental benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring access to housing benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring access to minimum income benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring the possibility to get acquainted with a variety of different tasks during the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Ensuring access to e-learning platform / training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strengthened outreach to vulnerable groups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring trainees receive mentoring (through a coach / counsellor)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring follow-up/advice after the traineeship	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensuring traineeships are inclusive to vulnerable groups (e.g., young people with disabilities, from a disadvantaged or migrant socio-economic background) in recruitment and participation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

3. **[GROUP I – ALL RESPONDENTS]** In addition to the above, are there any other elements which would increase the quality of traineeships?

[Free text box]

4. **GROUP IIB –POTENTIAL TRAINEES** Please tick why you have not yet participated in a traineeship so far:

- ☐ I have never considered doing a traineeship
- ☐ The traineeship(s) I found was unpaid or not paid enough
- ☐ The duration of the traineeship(s) I found was not in line with my needs
- ☐ The working hours of the traineeship(s) I found were not suitable for me
- ☐ I could not find a traineeship in my sector
- ☐ I could not find a traineeship providing the skills and competences I was looking for
- ☐ I have applied for a traineeship, but I was not selected
- ☐ I was supposed to do a traineeship, but a better/different opportunity came around (e.g., a job offer)
- ☐ Other (please specify)

[Effectiveness]

5. **[GROUP IV ALL ORGANISATIONS]** To what extent are the QFT principles¹¹ present in national legislation or quality frameworks in your country/across the EU?

- ☐ To a large extent
- ☐ To a moderate extent
- ☐ To a small extent
- ☐ Not at all
- ☐ Do not know

Why? Please explain your answer [Free text box]

6. **[GROUP IV ALL ORGANISATIONS]** Are there mechanisms in place that make sure that employers comply with the national traineeship legislation or frameworks?

- ☐ To a large extent
- ☐ To a moderate extent
- ☐ To a small extent
- ☐ Not at all

¹¹ If technically possible, there should be an optional pop-up box opening (when clicked) with the list of QFT principles explained (see on top of the form). If not possible, at least a mention 'as explained in the introduction'

- ☐ Do not know

Please explain your answer *[Free text box]*

7. **[GROUP I – ALL RESPONDENTS]** In your opinion, to what extent has the QFT helped young people move into stable employment in your country/the EU?

- ☐ To a large extent
☐ To a moderate extent
☐ To a small extent
☐ Not at all
☐ Do not know

Please explain your answer and provide any examples *[Free text box]*

8. **[GROUP IV ALL ORGANISATIONS]** Has the implementation of the QFT had a positive effect on traineeships your sector¹² (if applicable)?

- ☐ Yes
☐ No
☐ Do not know
☐ Not applicable
☐ Other

[Free text box. Please use this field to indicate other sectors in which you think the QFT has had a positive effect]

*Please explain your answer and provide any examples *[Free text box]*

9. **[GROUP IV ALL ORGANISATIONS]** Has the implementation of the QFT had a negative effect on traineeships your sector¹³ (if applicable)?

- ☐ Yes
☐ No
☐ Do not know
☐ Not applicable
☐ Other

[Free text box. Please use this field to indicate the sectors in which you think the QFT has had a negative effect]

*Please explain your answer and provide any examples *[Free text box]*

10. **[GROUP IV ALL ORGANISATIONS]** To what extent do traineeships in your organisation comply with the QFT principles of the Recommendation?

¹² As identified in question G

¹³ As identified in question G

- ☐ To a large extent
- ☐ To a moderate extent
- ☐ To a small extent
- ☐ Not at all
- ☐ Do not know
- ☐ Not applicable
- ☐ Other

[Free text box]

[Efficiency]

11. **[GROUP IV ALL ORGANISATIONS]** To your knowledge, are there **administrative costs** associated with the implementation of the QFT (i.e., paperwork, submission of reports, application of grants, cooperation with inspection by public authorities, etc)?

- ☐ Yes
- ☐ No
- ☐ Do not know

[if 11 = "Yes"] How high are these administrative costs?

Very high	Quite high	Quite low	Very low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Please explain your answer.

12. **[GROUP IV ALL ORGANISATIONS]** How would you rate the benefits (for your organisation) of implementing the QFT?

Very high	Quite high	Quite low	Very low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer.

13. **[GROUP IV ALL ORGANISATIONS]** How would you rate the **costs of implementing** the QFT as **compared to the benefits** (proportionality)?

Very high	Quite high	Quite low	Very low	Don't know
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer.

14. **[GROUP IV ALL ORGANISATIONS]** Would your organisation (continue to) offer traineeships if these were paid/remunerated?

- ☐ Yes
- ☐ No

- ☐ Do not know
- ☐ Not applicable

15. **[GROUP IV ALL ORGANISATIONS]** What, in your view, are the main obstacles preventing employers from offering quality traineeships (compliant to the QFT Recommendation)?

- ☐ The costs associated
- ☐ Lack / insufficient benefits associated
- ☐ Administrative burden associated
- ☐ Insufficient awareness of the QFT principles
- ☐ Other

[Free text box]

- ☐ Do not know

16. **[GROUP IV ALL ORGANISATIONS]** How has the QFT helped employers to offer (quality) traineeships?

- ☐ By raising awareness of the principles of quality traineeships
- ☐ By providing more practical guidance on the principles of quality traineeships
- ☐ By facilitating the establishment of national legislation on / national quality frameworks for quality traineeships
- ☐ By directing more EU / national funds towards supporting traineeships
- ☐ Other

[Free text box]

- ☐ Do not know

17. **[GROUP I – ALL RESPONDENTS]** In your opinion, to what extent has the QFT contributed to the following benefits in your country/the EU?

	To a large extent	To a moderate extent	To a small extent	Not at all	Do not know
More young people complete traineeships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overall quality of traineeship offers has improved	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Young people find stable jobs faster after finishing school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduced number of young people not in employment, education or training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Fewer young people are unemployed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other – please specify	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your answer *[Free text box]*

18. **[GROUP IV ALL ORGANISATIONS]** How could the QFT be improved?

[Free text box]

[EU added value]

19. **[GROUP IV – ALL ORGANISATIONS]** To what extent has implementation of the EU-level quality framework (QFT) produced added value compared to what could have been achieved if your country had acted alone?

Added value of the Quality Framework for Traineeships (QFT):	To a large extent	To a moderate extent	To a small extent	Not at all	Do not know
There are more traineeships of good quality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Young people are more interested in doing traineeships	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
It improved access to traineeships for vulnerable young people	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
QFT has brought about structural improvements in employment/education/training policy at national level	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
It made it easier to do a traineeship abroad	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (free text)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please explain your response, including by providing examples *[Free text]*

[Closing]

20. **[GROUP I – ALL RESPONDENTS]** Do you have any other comments or documents (policy papers/ positions, reports) to share? *[Free text and upload box]*
21. **[GROUP II – TRAINEES/POTENTIAL TRAINEES]** Would you be willing to be contacted by the study team to further share your views on traineeships?

Appendix 4: Questionnaire for the survey of trainees and potential trainees

Thank you for taking part in this survey which aims to gather the views of young people on traineeships.

A traineeship is a limited period of work experience, whether paid or not, which aims to increase people's skills and experience in the workplace. In some countries, it can also be called an internship. For this survey, when we talk about a traineeship, we mean work experience that is done voluntarily by someone who wants to increase their skills in the job market. We do not include training that is a mandatory part of the curriculum of formal education or vocational education and training (for example, training to become a doctor or a lawyer), nor an apprenticeship.¹⁴

The views that you express in this survey will be analysed as part of an evaluation which the European Commission is carrying out. This is your opportunity to share your experience and view on traineeships in your country and to have a say on future policy measures in this area.

Information provided in the survey will be treated anonymously.

Please note that a public consultation survey will be also launched shortly as part of the same evaluation. This consultation will target a larger audience and cover additional aspects of traineeships and EU relevant policies. Should you be interested in taking part in this consultation as well you'll find the link at the end of this survey.

SCREENING QUESTIONS

Q1. Please indicate your experience in relation to traineeships: [single select](#)

- a. I took part in one or more traineeship(s) and/or I am currently taking part in a traineeship
- b. I have never taken part in a traineeship

Logic: If Q1= a, ask Q2

Q2. Thinking about the traineeship(s) you did, were any of these traineeships a mandatory part of your studies/curriculum or a requirement to practice a profession (e.g., medicine, architecture, law etc.)?
[Single select](#)

- a. Yes, all of my traineeships
- b. Yes, but not all of them
- c. None of them

Logic: If Q1= a AND Q2 is not =a, ask Q3

Q3. Thinking about your most recent traineeship which was NOT a mandatory part of your studies/curriculum nor a requirement to practice a profession, please indicate the start and end year:

- a. Start year: [Before 2014](#), [2014](#), [2015](#), ... up to [2022](#)
- b. End year: [Before 2014](#), [2014](#), [2015](#), ... up to [2023](#)

DEMOGRAPHIC QUESTIONS

Q4. Please indicate your country of origin: [single select](#)

- a. List of worldwide countries (EU MS on top of the list)

Q5. Please indicate your country of residence: [single select](#)

- a. List of worldwide countries (EU MS on top of the list)

¹⁴ Apprenticeships are generally understood as 'programmes of learning that combine part-time formal education with training and experience at the workplace, and result in an externally recognised vocational qualification'

Q6. Please indicate your gender: [single select](#)

- a. Male
- b. Female
- c. Other
- d. Prefer not to say

Q7. Please indicate your age:

Q8. Please indicate your highest level of qualification obtained: [single select, drop-down menu](#)¹⁵

- a. Lower secondary or below (e.g., Elementary school)
- b. Upper secondary (e.g., High school)
- c. Tertiary or above (e.g., University)
- d. Vocational (secondary level)
- e. Vocational (tertiary level)

Q9. Do you have any disability?

- a. Yes
- b. No

(Logic: If Q1 = b or Q2=a, send to Q59)

Logic: If Q1= a, ask Set A: Trainees questions

SET A: TRAINEES QUESTIONS

Logic: If Q1= a, ask Set A: Trainees questions

For this survey, please refer to any traineeship(s) you did that was NOT a mandatory part of your studies/curriculum or a requirement to access a specific profession (e.g., medicine, architecture, etc.)

Q10. Please indicate how many traineeships you have done, including the one that you might be currently doing:¹⁶

[Selection matrix](#)

None/1/2/3/4/5/More than 5

- a. Traineeship during your education, professional training or studies
- b. Traineeship after the end of your education, professional training or studies

Q11. How many of these traineeships were, at least partly, abroad:¹⁷ None/1/2/3/4/5/More than 5

Logic: if Q3-End date <= 2014 send respondent to SET C

*We will now ask you a few questions on your experience as a trainee. In case you have taken part in more than one traineeship then please answer all the following questions thinking about **your most recent or on-going traineeship experience**.*

Q12. When you did this traineeship, were you:¹⁸

- a. Self-employed
- b. Employed
- c. A student (full time)
- d. A student (part time)

¹⁵ 2013 Eurobarometre survey: Have you graduated from university or equivalent?

¹⁶ 2013 Eurobarometre survey: Overall, how many traineeships have you had? Overall, how many traineeships have you had after the end of your studies?

¹⁷ 2013 Eurobarometre survey: Overall, how many traineeships have you had abroad?

¹⁸ 2013 Eurobarometre survey: As far as your current occupation is concerned, would you say you are self-employed, an employee, a manual worker or would you say that you are without a professional activity? - When did your last traineeship take place? 1) During your studies, 2) When you were about to finish your studies. 3) After you finished your studies

- e. Unemployed
- f. Looking for a job
- g. Other, please specify

Logic: if anything but c or d to Q12, ask Q13

Q13. What was your highest level of qualification when you did this traineeship: [single select, drop-down menu](#)

- a. Lower secondary or below (e.g., Elementary school)
- b. Upper secondary (e.g., High school)
- c. Tertiary or above (e.g., University)
- d. Vocational (secondary level)
- e. Vocational (tertiary level)

Logic: if c or d to Q12, ask Q14

Q14. What level of education were you enrolled in when you did this traineeship: [single select, drop-down menu](#)

- a. Lower secondary or below (e.g., Elementary school)
- b. Upper secondary (e.g., High school)
- c. Tertiary or above (e.g., University)
- d. Vocational (secondary level)
- e. Vocational (tertiary level)

Q15. How long did your most recent traineeship last?¹⁹ [Drop down menu, single select.](#)

- a. 1 month
- b. 2 months
- c. 3 months
- d. ... options up to 12 months
- e. More than 12 months

Logic: If End date in Q3= 2022, ask Q16

Q16. Is your traineeship still on-going? [Single select.](#)

- a. Yes
- b. No

Q17. Was your traineeship extended/renewed?²⁰ [Single select](#)

- a. Yes
- b. No

Logic: If Q17 = a (yes), ask Q18 and Q19

Q18. For how long? [Single select](#)

- a. Few weeks
- b. 1-3 months
- c. 3-6months
- d. 6-12 months
- e. More than a year

Q19. Why was it extended? [Open end](#)

Q20. In which country(s) did you do your traineeship? [Multiple select](#)

- a. List of EU countries + other please specify

Q21. In which sector did you do your traineeship? [Single select](#)

- a. Agriculture, forestry & fishing
- b. Industry (except construction)

¹⁹ 2013 Eurobarometre survey: How long did this traineeship last?

²⁰ 2013 Eurobarometre survey: Again, thinking about your last traineeship, please tell me if ... At the end of your traineeship, the organisation or company offered to renew or extend the traineeship

- c. Construction
- d. Wholesale & retail trade, transport, accommodation & food
- e. Information & communication
- f. Financial & insurance activities
- g. Professional, scientific & technical activities
- h. Public sector / administration
- i. Education
- j. Health & social work
- k. Arts, entertainment & recreation
- l. Other [Free text – maximum 30 characters]

Q22. Was your traineeship provider:

- a. A private company/organisation
- b. A public company/organisation
- c. Don't know

Q23. What was the size of your traineeship provider?²¹

- d. 1 to 9 employees
- e. 10 to 49 employees
- f. 50 to 250 employees
- g. More than 250 employees
- h. Don't know

TRANSPARENCY REQUIREMENTS

Q24. How did you find this traineeship opportunity? [Single select.](#)

- a. Through my networks of friends, acquaintances, or families
- b. On job posting sites e.g., Indeed, Glassdoor
- c. Other internet websites (e.g., online newspapers)
- d. LinkedIn job ad
- e. Social media groups
- f. Social media ads
- g. Printed media (e.g., Newspaper)
- h. Radio
- i. Billboard ads, e.g., poster
- j. Job fairs or events
- k. EURES portal
- l. EURES advisor
- m. Public employment service
- n. Other (Please specify)
- o. Don't know/ Do not remember

Q25. How easy would you say it is to find information about traineeship opportunities in the country where you did your traineeship?

Options: Very difficult, Difficult, Easy, Very Easy, Don't know

Q26. Please explain your answer [Open end](#)

Logic: If Q24= b, c, d, e, f, g, h, j, k, ask Q27

Q27. Which of the following elements were clearly mentioned in the vacancy notice advertising the traineeship? Please select all that apply. [Multiple select](#)

- a. The terms and conditions of the traineeship
- b. The duration of the traineeship
- c. The traineeship working hours
- d. The tasks/ job description
- e. Whether trainees are entitled to an allowance and/or compensation

²¹ 2013 Eurobarometer survey: What was the size of your host company or organisation?

- f. The amount of the allowance and/or compensation²²
- g. Whether trainees are covered by health and accident insurance
- h. The traineeship provider's recruitment policies
- i. The share of trainees recruited by the provider in recent years
- j. Chances of being hired after the traineeship
- k. None of the above
- l. I can't remember

Logic: If Q27= is not I then ask Q28 and Q29

Q28. Was there any other information in the vacancy note that was interesting/helpful for you? Open end

Q29. Was there any information that you would have liked to find in the vacancy note that wasn't there? Open end

Logic: If Q27=I then ask Q30

Q30. Which of the following elements would you like to find in a vacancy notice advertising the traineeship? Please select all that apply. Multiple select

- m. The terms and conditions of the traineeship
- n. The duration of the traineeship
- o. The traineeship working hours
- p. The tasks/ job description
- q. Whether trainees are entitled to an allowance and/or compensation
- r. The amount of the allowance and/or compensation²³
- s. Whether trainees are covered by health and accident insurance
- t. The traineeship provider's recruitment policies
- u. The share of trainees recruited by the provider in recent years
- v. Chances of being hired after the traineeship
- w. Other please specify:
- x. I don't know

Logic: If Q27 = a – g, ask Q31

Q31. To what extent were the actual conditions of the traineeship in line with the conditions advertised in the vacancy notice? Single select

- a. 1 – Not at all
- b. 2 – Some were in line, while others were not
- c. 3 – All were in line with the information in the vacancy note

WRITTEN TRAINEESHIP AGREEMENT

Q32. Did you and the traineeship provider sign a written traineeship agreement at the beginning of the traineeship?²⁴ Single select

- a. Yes
- b. No
- c. Don't know/ Can't remember

Logic: If Q32 = a (yes), ask Q33

²² 2013 Eurobarometer survey: Again, thinking about your last traineeship, please tell me if ... The advertisement made it clear how much the traineeship was paid

²³ 2013 Eurobarometer survey: Again, thinking about your last traineeship, please tell me if ... The advertisement made it clear how much the traineeship was paid

²⁴ 2013 Eurobarometre survey: Again, thinking about your last traineeship, please tell me if ... You signed a written agreement or contract with the organisation or company

Q33. You said that you signed a traineeship agreement with your traineeship provider. Which of the following elements were clearly mentioned in the written agreement? Please select all that apply. [multiple select.](#)

- a. Your educational objectives
- b. Your working conditions
- c. Your rights and obligations
- d. Your holiday entitlements
- e. Rights and obligations of your traineeship provider
- f. Your traineeship providers policies on confidentiality
- g. Your traineeship providers policies on intellectual property rights
- h. Duration of your traineeship
- i. Whether an allowance or compensation was provided to you
- j. How much the allowance or compensation was
- k. Whether health and accident insurance was provided to you
- l. Whether you were entitled to sick leave
- m. Designation of a supervisor
- n. Conditions for an extension of the traineeship
- o. Conditions for termination of the traineeships
- p. Other (please specify)
- q. None of the above
- r. Don't know/ Can't remember

Logic: If any a-n is not selected in Q27 or Q33, ask Q34

Q34. Was any of the following information provided to you at any point before or during the traineeship?

- a. List of options not selected in Q27 or Q33

Options: Yes before the start of the traineeship, Yes during the traineeship, No

Q35. Did you receive, at any point before or during the traineeship, any other information on the conditions of your traineeship that you found particularly useful? Were you missing any information? [Open end](#)

LEARNING AND TRAINING OBJECTIVES

Logic: If m not selected in Q33, ask Q36

Q36. Did you have a supervisor in your traineeship? [Single select](#)

- a. Yes
- b. No

Q37. To what extent do you agree with the statements below? [Selection Matrix](#)

Strongly disagree/disagree/neither/ agree/ Strongly agree, Don't know

- a. [\[Logic: If Q33=a or learning objectives is selected in Q34 \(your learning objectives\)\]](#) I was involved in defining my learning objectives during my traineeship
- b. [\[Logic: If Q33=a or learning objectives is selected in Q34 \(your learning objectives\)\]](#) I feel I progressed on the educational objectives set for my traineeships
- c. [\[Logic: If Q33=a or learning objectives is selected in Q34 \(your learning objectives\)\]](#) My tasks helped me achieve my learning and training objectives
- d. I was given the possibility to become familiar with different tasks during my traineeship
- e. My tasks helped me gain practical experience and relevant skills
- f. I received mentoring through a coach/counsellor during my traineeship
- g. [\[Logic: If Q3\(End year<2022\) or Q16=b\]](#) I received follow-up advice after my traineeship has ended
- h. [\[Logic: If Q36 = a \(yes\) OR If m is selected in Q33\]](#): The supervisor monitored and assessed my progress

- i. **[Logic: If Q36 = a (yes) OR If m is selected in Q33]:** I could turn to a supervisor who explained how to do the work²⁵
- j. **[Logic: If Q36 = a (yes) OR If m is selected in Q33]:** My supervisor was specifically trained for the supervisory role

WORKING CONDITIONS APPLICABLE TO TRAINEES

Q38. To what extent were the actual conditions of the traineeship in line with the conditions stated in the written agreement?

- a. 1 – Not at all
- b. 2 – Some were in line, while others were not
- c. 3 – All were in line with the information in the written agreement

Logic: If Q38 = a, b, ask Q39.

Q39. Please describe how the actual conditions of the traineeship were different from those stated in the written agreement: [open end](#)

Q40. Did you receive any financial allowance or compensation during your traineeship?²⁶ **Single select**

- a. Yes, I received a monthly financial allowance or compensation
- a. Yes, I received a financial allowance or compensation, but this was occasional and not on a regular basis
- b. No, I did not receive any financial allowance or compensation

Logic: If Q40 = a, ask Q41 and Q42

Q41. Could you please indicate the (average) monthly value of your allowance and/or compensation in EUR (excluding any other benefits)? [Open end](#)

Q42. Please indicate if your allowance and/or compensation was:

- a. Below national minimum wage
- b. Equal to the national minimum wage
- c. Above the national minimum wage
- d. Don't know/ uncertain

Logic: If Q40 = a or b ask Q43.

Q43. To what extent was this financial compensation sufficient to cover basic living costs such as rent, food etc.?²⁷

1 Not at all; 2 To a small extent; 3 To a fairly large extent; 4 To a great extent; 5 Do not know

Q44. Did you receive any of the following benefits? Please select all that apply. **Multiple select.**

- a. I received support in kind during my traineeship (e.g., meal vouchers or cheaper food at the company canteen)
- b. I was compensated for any overtime I did
- c. My travel costs were reimbursed, e.g., my commute to work
- d. My housing costs were reimbursed
- e. I had access to housing benefits
- f. I had access to health and sickness benefits
- g. I had access to benefits related to accidents at work and occupational diseases
- h. I was entitled to paid sick leave
- i. I accumulated pension rights

²⁵ 2013 Eurobarometer survey: Please tell me if you totally agree, tend to agree, tend to disagree or totally disagree with each of the following statements? During this traineeship, you could turn to a mentor who helped you and explained how to do the work

²⁶ 2013 Eurobarometer survey: Again, thinking about your last traineeship, please tell me if ... You received payment or financial compensation

²⁷ 2013 Eurobarometer survey: Again, thinking about your last traineeship, please tell me if ... This financial compensation was sufficient to cover basic living costs such as rent, food etc

- j. I had access to maternity/paternity/parental benefits
- k. I had access to minimum income benefits
- l. I had access to housing benefits
- m. I had access to disability/incapacity benefits
- n. I had access to training opportunities
- o. Other, please specify
- p. I did not receive any of these benefits

Q45. How many holiday days were you entitled to during your traineeship (please do not consider the extension period if any)? [Single select](#)

- a. 1 day
- b. 2 days
- c. 3 days
- d. ... options up to 30 days
- e. I was not entitled to any holidays

Q46. Apart from your pay, to what extent were your working conditions equivalent to those of regular employees (in terms of equipment, working hours, treatment, workload, etc.)?²⁸

1 Much worse; 2 Somewhat worse; 3 Equivalent; 4 Somewhat better; 5 Much better; 6 Do not know

- a. Your working conditions in general
- b. Your rights and obligations
- c. Your holiday entitlements
- d. Your allowance or compensation
- e. Your benefits in kind (e.g., meal vouchers or cheaper food at the company's canteen)
- f. Your reimbursement of travel costs
- g. Your reimbursement of housing costs
- h. Compensation for any overtime done
- i. Your pension rights
- j. Health and Sickness benefits
- k. Access to benefits related to accidents at work and occupational diseases
- l. Paid sick leave
- m. Access to maternity/paternity/parental benefits
- n. Access to minimum income benefits
- o. Access to housing benefits
- p. Access to disability/incapacity benefits
- q. Access to training opportunities
- r. Other (please specify)

Logic: if 1 or 2 to Q46, ask Q47

Q47. Please provide more details. [Open end](#)

PROPER RECOGNITION OF TRAINEESHIPS

Q48. Did/will you receive a certificate or a letter of reference at the end of your traineeship demonstrating the knowledge, skills and competences you gained during the traineeship?²⁹ [Single select](#)

- a. Yes, a certificate
- b. Yes, a letter of reference

²⁸ 2013 Eurobarometre survey: Please tell me if you totally agree, tend to agree, tend to disagree or totally disagree with each of the following statements? Apart from your pay, your working conditions were equivalent to those of regular employees (in terms of equipment, working hours, treatment, workload, etc.)

²⁹ 2013 Eurobarometre survey: Again, thinking about your last traineeship, please tell me if ... At the end of your traineeship the organisation or company gave you a certificate or a letter of reference describing what you had done

- c. No
- d. Don't know

CROSS-BORDER TRAINEESHIPS

Logic: If Q11 = 'none', ask Q49.

Q49. What are the three main reasons that you have not had a traineeship abroad?³⁰ Multiple select, up to 3

- a. I was not interested / did not consider it at all
- b. I was not well-informed about traineeships abroad
- c. I did not have a sufficient command of a foreign language
- d. I did not have enough financial resources
- e. I could not find a traineeship abroad
- f. Other (please specify)
- g. None of the above

Logic: If Q11>0

Please answer the following few questions thinking about your cross-border traineeship experience.

Logic: If Q10>1 ask Q50

Q50. How did you find this cross-border traineeship opportunity? Single select.

- a. Through my networks of friends, acquaintances, or families
- b. On job posting sites e.g., Indeed, Glassdoor
- c. Other internet websites (e.g., online newspapers)
- d. LinkedIn job ad
- e. Social media groups
- f. Social media ads
- g. Printed media (e.g., Newspaper)
- h. Radio
- i. Billboard ads, e.g., poster
- j. Job fairs or events
- k. EURES portal
- l. EURES advisor
- m. Public employment service
- n. Other (Please specify)
- o. Don't know/ Do not remember

Logic: If Q11>0 ask Q51 and Q52

Q51. What were the challenges that you faced in your cross-border traineeship experience? Please select all that apply. Multiple select

- a. Language difficulties
- b. Legal and administrative barriers e.g., different taxation system, social security, pension
- c. Socio-cultural differences
- d. Complex administrative procedures
- e. Physical access to work e.g., a lack of public transport connections
- f. Costs of travelling abroad
- g. Other financial constraints (please specify): _____
- h. Other (please specify) _____
- i. I did not face any challenges [exclusive select]

Q52. To what extent did you gain any of the following benefits from this traineeship experience abroad?³¹

³⁰ 2013 Eurobarometre survey: What are the main reasons why you have not had a traineeship abroad? Options: 1. You were not interested / did not consider it at all. 2. You were not well-informed about traineeships abroad. 3. You did not have a sufficient command of a foreign language. 4. You did not have enough financial resources 5. You could not find a traineeship abroad

³¹ 2013 Eurobarometre survey: Did the traineeship(s) abroad... 1) Improve your command of another language
2) Made you consider working in a foreign country

1 Not at all; 2 To a small extent; 3 To a fairly large extent; 4 To a great extent; 5 Do not know

- a. Improved my command of another language
- b. Made me consider working in a foreign country
- c. Gave me insights into another culture
- d. Other (please specify)

OUTCOMES AND RESULTS

Logic: If Q16 = No: Display the following message

As your internship is on-going, please answer the following questions on the basis of the expected benefits or on the basis of your current experience.

Q53. To what extent do you agree with the following statements concerning your traineeship?

1 Not at all; 2 To a small extent; 3 To a fairly large extent; 4 To a great extent; 5 Do not know

- a. I learnt things that are useful professionally³²
- b. I acquired skills and competences specific to the sector I was working in
- c. I acquired transversal skills (e.g., communication skills, leadership skills, teamworking, etc.)
- d. I acquired real-life work experience
- e. It made my transition from school to work easier
- f. It made my re-entry in the job market easier
- g. It supported my personal development e.g., improved self esteem
- h. It supported my professional development overall
- i. It provided networking opportunities
- j. This traineeship was or will be helpful for you to find a regular job³³
- k. Other, please specify

Logic: If Q3(End year<2022) OR Q16 = Yes, ask Q54

Q54. Were you offered a job at the end of your traineeship?

- a. Yes, immediately after the end of the traineeship
- b. Yes, within a month after the end of the traineeship
- c. Yes, within three months after the end of the traineeship
- d. Yes, within six months after the end of the traineeship
- e. Yes, after six months after the end of the traineeship
- f. No, I was not offered a job after my traineeship

Logic: If Q54 = a or b or c or d or e, ask Q55

Q55. Who offered you this job?

- a. The same employer I worked for during the traineeship
- b. An employer I got in touch during my traineeship (e.g., a business partner, supplier, client of the traineeship provider)
- c. An employer not related to my traineeship

Logic: If Q54 = a or b or c or d or e, ask Q56

Q56. In what way(s) do you think the traineeship helped you get the job offer? Please select all that apply.

Multiple select

- a. I gained some experience required for the job I got
- b. I got a chance to network with the people that helped me get the job
- c. The traineeship made me stand out as a job candidate
- d. The traineeship allowed me to acquire or refine some skills required for the job
- e. The traineeship helped me to get ready to transition to work environment
- f. Other (please specify)
- g. It did not help get the job offer

³² 2013 Eurobarometer survey: Please tell me if you totally agree, tend to agree, tend to disagree or totally disagree with each of the following statements? During this traineeship, you learnt things that are useful professionally

³³ 2013 Eurobarometer survey: Please tell me if you totally agree, tend to agree, tend to disagree or totally disagree with each of the following statements? This traineeship was or will be helpful for you to find a regular job

Q57. Which of the following types of support would have been helpful during or at the end of traineeship to help you secure a job? Please rate using a scale from 1 to 5 where 1 is not at all useful and 5 is extremely useful. [Selection matrix.](#)

1 Not at all useful; 2 Not useful; 3 Neither; 4 Useful; 5 Extremely useful; Not applicable

- a. Guidance and/or support from a supervisor
- b. Guidance and/or support from university/school/college
- c. Guidance and/or support from a job agency
- d. Training or learning opportunities provided from the company
- e. Feedback from colleagues/team members
- f. Other (please specify)

Q58. Are there other elements of traineeships that you consider very important to increase your chances of getting a job (or a better job offer) after your traineeship? [Open end](#)

Logic: If Q1= b OR Q2=a ask Q59

Q59. Are you planning to do a traineeship which is NOT a mandatory part of your studies/curriculum nor a requirement to practice a profession?

- a. Yes
- b. No

Logic: If Q59= a, ask Set B

SET B: POTENTIAL TRAINEES (young people without traineeships experience but planning to do a traineeship)

Q60. What channels will you use to find out about traineeship opportunities? [Single select.](#)

- a. My networks of friends, acquaintances, or families
- b. On job posting sites e.g., Indeed, Glassdoor
- c. Other internet websites (e.g., online newspapers)
- d. LinkedIn job ad
- e. Social media groups
- f. Social media ads
- g. Printed media (e.g., Newspaper)
- h. Radio
- i. Billboard ads, e.g., poster
- j. Job fairs or events
- k. EURES portal
- l. EURES advisor
- m. Public employment service
- n. Other (Please specify)
- o. Don't know

Q61. How easy would you say it is to find information about traineeship opportunities in the country where you did your traineeship?

Options: Very difficult, Difficult, Easy, Very Easy, Don't know

Q62. Please explain your answer [Open end](#)

Logic: If Q59= b, ask Set C

SET C: YOUNG PEOPLE WITHOUT TRAINEESHIP EXPERIENCE AND NOT PLANNING TO DO ONE

Q63. Please indicate the main reason why you have never taken part in a traineeship. [Single choice](#)

- a. I have never considered doing a traineeship
- b. I have looked for a traineeship, but I could not find a good opportunity
- c. I have applied for a traineeship, but I was not selected

- d. I was supposed to do a traineeship, but a better/different opportunity came around (e.g., a job offer)
- e. Other (please specify)

Logic: Q63 = a, ask Q64

Q64. Why have you never considered doing a traineeship? [Open question](#)

Logic: If Q63 = b, ask Q65

Q65. Why could you not find a good opportunity? Please select all that apply. [Multiple select](#)

- a. The traineeship(s) I found was unpaid or not paid enough
- b. The duration of the traineeship(s) I found was not in line with my needs
- c. The working hours of the traineeship(s) I found were not suitable for me
- d. I could not find a traineeship in my sector
- e. Could not find a traineeship providing the skills and competences I was looking for
- f. Other (please specify)

Logic: If Q65= b, ask Q66

Q66. You mentioned that the duration of the traineeships you found was not in line with your needs. How long were these traineeships? (Select all that apply) [Multiple select](#)

- g. Less than 3 months
- h. Between 3 months and 5 months
- i. 6 months
- j. Between 6 and 9 months
- k. More than 9 months

Logic: If Q63 = b, ask Q67

Q67. What channels did you use to find out about traineeship opportunities [Single select](#).

- a. My networks of friends, acquaintances, or families
- b. On job posting sites e.g., Indeed, Glassdoor
- c. Other internet websites (e.g., online newspapers)
- d. LinkedIn job ad
- e. Social media groups
- f. Social media ads
- g. Printed media (e.g., Newspaper)
- h. Radio
- i. Billboard ads, e.g., poster
- j. Job fairs or events
- k. EURES portal
- l. EURES advisor
- m. Public employment service
- n. Other (Please specify)
- o. Don't know

SET D: Closing questions for ALL

Q68. On a scale of 1 to 5, where 1 is Very bad and 5 is Very good, what is your opinion on traineeships in the country where you did your traineeship?

1 Very bad; 2 Bad; 3 Neutral; 4 Good; 5 Very good; Don't know/No opinion

Q69. Please explain your answer

Q70. What could be done to improve traineeships in the country where you did your traineeship? [Open question](#)

Q71. How important are the following elements for you if you were doing a traineeship?

'Essential', 'Important', 'Not too important', 'No opinion'

Health and accidents

- a. To have access to Health and Sickness benefits
- b. To have access to benefits related to accidents at work and occupational diseases
- c. To be entitled to paid sick leave

Pension and parental rights

- d. To accumulate pension rights
- e. To have access to maternity/paternity/parental benefits

Housing and minimum income benefits

- f. To have access to housing benefits
- g. To have access to minimum income benefits

Compensation

- h. To be paid for my traineeship
- i. To be compensated for any overtime done
- j. To be paid at least the national minimum wage for my traineeship

Additional benefits

- k. To receive support in kind during my traineeship (e.g., vouchers for food)
- l. To be reimbursed for my travel costs
- m. To be reimbursed for my housing costs

Training and learning on the job

- n. To have access to training opportunities
- o. To be given the possibility to become familiar with different tasks during my traineeship

Accessibility and inclusiveness

- p. The traineeship is inclusive to vulnerable groups (e.g., young people with disabilities, from a disadvantaged socio-economic or migrant background)
- q. To have access to disability/incapacity benefits

Q72. Are there any other elements of a traineeship that would be important for you?

Thanks for taking part in our survey.

As mentioned in the introduction to this survey, the European Commission will soon launch another public consultation survey as part of the same evaluation. This consultation will target a larger audience and cover additional aspects of traineeships and EU relevant policies. We invite you to respond to this public consultation, if you would like to take part in it, please register here and we will send you an email once the consultation has been launched.

Appendix 5: Topic guides for the targeted interviews

Topic guide for national level interviews

Background information

Ecorys has been commissioned by the European Commission Directorate for Employment, Social Affairs and Inclusion (DG EMPL) to carry out an objective and impartial study to support the evaluation of the 2014 Council Recommendation on a Quality Framework for Traineeships.

What do we mean by “traineeships” in this study?

In the context of this study, traineeships are defined as “a limited period of work practice, whether paid or not, which includes a learning and training component, undertaken in order to gain practical and professional experience with a view to improving employability and facilitating transition to regular employment.”

The study focuses on two types of traineeships:

1. Open market traineeships³⁴
2. Traineeships that fall under Active Labour Market Policies³⁵.

Our interview questions are limited to these, and do not cover (1) work experience placements that are part of curricula of formal education or vocational education and training (e.g., student traineeships; apprenticeships); and (2) traineeships regulated under national law and whose completion is a mandatory requirement to access a specific profession (e.g., medicine, architecture, etc.).

Context, role & expertise

1. Please give an overview of your position, and areas of responsibility, focusing on aspects relevant to the implementation of traineeships.
2. What type of involvement have you had in designing, promoting, supporting or/and monitoring the implementation of the QFT in your country?

Current situation and evolution since 2014

1. How prevalent are traineeships in your country? How has this evolved over the past seven years? Are there specific sectors where traineeships are more prevalent?
2. What are the most common characteristics of young trainees in your country (e.g., sex, age, education background, socioeconomic background, ethnic minority status)? How has this evolved over the past seven years?
3. How do the typical working and learning conditions of trainees compare to those of regular employees in your country?
4. What is the public debate in your country, if any, about the importance of quality traineeships for young people? Has this debate evolved since the launch of the QFT in 2014?

Relevance

³⁴ Open market traineeships are defined as non-mandatory, bilateral, and private agreements between a trainee and a traineeship provider. They do not have a formal connection to education or training. Their main beneficiaries are students, graduates, or employees seeking practical training on the job.

³⁵ ALMP-type traineeships are offered to (young) unemployed or those at risk of becoming unemployed, and there is usually a public institution (most often a PES) acting as an intermediary between the training provider and the trainee.

1. To what degree are the QFT principles overall appropriate for fostering the stable labour market integration of young people in your country?

a. Are they appropriate for all young people? *Prompt: what about those with fewer opportunities?*

OR: To what degree is establishing quality standards for traineeships relevant for fostering labour market integration of young people in your country?

2. Are there any specific principles which are more or less important in this light, and why?
3. How well do the principles of the QFT still correspond to needs in your country? *Prompt: e.g., in light of the impact of Covid 19 and the changing labour market?* Have any adaptations been made to the QFT principles to reflect specific needs in your country?

OR: To what degree does establishing quality standards for traineeships correspond to needs within your country today?

4. To what extent do the QFT principles respond to the concern that traineeships may be used to replace regular employment for young people?

OR: To what extent does establishing quality standards for traineeships address the concern that traineeships can be used to replace regular employment for young people?

5. How well does the nature of the QFT as a non-binding policy correspond to the needs and socio-economic problems to be tackled in your country? Has this changed over time?

Effectiveness

1. To what extent have the principles of the QFT been transposed/enshrined in national legislation in your country? Did this occur before or after the QFT (2014)?
 - a. Have any principles been more challenging for your country to implement than others?
 - b. What have been the obstacles (if any) to the full transposition and implementation of the QFT in your country?

OR: To your knowledge, has your country adopted legislation/national frameworks on traineeships over the past few years?

- **What are the main obstacles of regulating traineeships? Is there any aspect that is particularly challenging? If so, why and for whom?**

2. To what degree have enforcement or monitoring mechanisms been put in place to facilitate compliance with national legislation/ quality frameworks? How effective have they been? Is there any evidence of negative effects of enforcement/monitoring?
3. What has been the impact of the implementation of the QFT on trainees? Which specific elements of QFT implementation have had the most positive/negative impacts on trainees and why?
 - b. Are there any sub-groups (e.g., sex, age, education background, socioeconomic background, ethnic minority status) for which the QFT has been less or more effective? If so, which and why?

OR: What has been the impact of regulating /establishing quality standards for traineeships on trainees? What elements of such regulation have had the most positive/negative impacts?

4. What has been the impact of the QFT implementation on traineeship providers? Which principles have had positive/negative impact and why? Are there any types of traineeship providers for which the QFT implementation has been more or less effective?

OR: What has been/can be the impact of regulating /establishing quality standards for traineeships on traineeship providers/employers?

5. What are the main obstacles which prevent employers in your country from offering traineeships? What support do they need to overcome these obstacles?
6. Are there any missing principles that would make the QFT more effective? Which? How would these make a difference to traineeship quality? *Prompt e.g., pay, access to health insurance, etc*

OR: What do you think are they key elements to ensure that traineeships are of good quality? How would these make a difference to trainees and traineeship providers?

7. Are you familiar with the European Framework for Quality and Effective Apprenticeships (EFQEA)? If so, in comparison to the EFQEA's achievements in the field of apprenticeships, to what degree has the QFT been effective in improving the quality of traineeships and the employability of trainees in your country? In what ways and why?

Efficiency

1. In your view, which stakeholders have incurred costs and/or administrative burdens associated with the implementation or compliance with the QFT?
 - a. Please think about the following types of stakeholders and potential costs incurred:
 - i. National level institutions (e.g., financial subsidies; monitoring costs)
 - ii. Social partners (e.g., guidance and awareness-raising costs, training costs)
 - iii. Employers (e.g., HR and training costs; advertising costs; costs associated with rights and benefits trainees are entitled to)
 - iv. Young trainees (e.g., transportation and living costs; materials)
 - b. What type of costs are they?
 - c. *[If relevant]* What types of costs has your organisation incurred related to implementation of the QFT?

OR: In your view, which stakeholders bear the costs of implementing quality traineeships? What type of costs are they?

2. Compared with the overall costs of providing traineeships in prior to the QFT, how large/significant would you say these *additional* costs have been?

Would you be able to share any literature or data sources on costs?

3. Have financial incentives been made available to traineeship providers in your country to increase the number or quality of traineeships? Have any EU funds contributed to these financial incentives?

4. Do you think QFT implementation has benefitted young people? If so, how? Prompt. E.g., by increasing the number of quality traineeship offered to them/through better learning content/improved working conditions/increased skills recognition

OR: Do you think ensuring quality traineeships benefits young people? If so, how?

5. Do you think QFT implementation has benefitted employers/traineeship providers? If so, how? Prompt: E.g., by improving their reputation as quality traineeship providers/employers; providing them with a more diverse, young workforce/resulting in tax exemptions/reductions and/or access to subsidies?

OR: Do you think ensuring quality traineeships benefits employers/traineeship providers? If so, how?

6. Are there any other benefits of QFT implementation for young people? For employers? For wider society? Prompt: for example, do you think QFT implementation has contributed to tackling youth unemployment/easing young people's school-to-work transitions/increasing young people's employability/fostering social inclusion for youth/reducing welfare costs/increasing tax revenue?

OR: Are there any wider benefits to ensuring quality traineeships for society at large?

7. In your view, to what extent are the costs proportionate to the benefits achieved? Is there scope for lowering costs?

Coherence

1. To what degree has the implementation of the QFT been coherent with education, training, employment and social policies at national and/or regional level in your country? Are there any synergies? Are there any conflicts or duplication?
2. To what extent has the implementation of the QFT been coherent with EU policies, programmes, and financial instruments on education and training, employment, and social policies? (e.g., Youth Guarantee, EFQEA, EURES, ESF, YEI, Erasmus+ etc)? Are there any synergies? Are there any conflicts or duplication?

EU added value

1. In your opinion, what additional value has been generated from the implementation of the QFT compared to what could have been expected by your country acting alone?

What would be the most likely consequences in your country of discontinuing the QFT at EU level? What would be the likely negative and positive effects?

2. What would be the most likely consequences in your country of continuing QFT implementation as at present? What would be the likely negative and positive effects?

Final questions

1. Are there any policy documents, evaluation studies, or monitoring information relevant to the topic that you can share with us?

Do you have any recommendations for other stakeholders we should consult?

2. Do you have any recommendations about possible multipliers to help us disseminate a survey targeting trainees as well as the Public Consultation in your country?

Topic guide for EU level interviews

Background information

Ecorys has been commissioned by the European Commission Directorate for Employment, Social Affairs and Inclusion (DG EMPL) to carry out an objective and impartial study to support the evaluation of the 2014 Council Recommendation on a Quality Framework for Traineeships.

What do we mean by “traineeships” in this study?

In the context of this study, traineeships are defined as “a limited period of work practice, whether paid or not, which includes a learning and training component, undertaken in order to gain practical and professional experience with a view to improving employability and facilitating transition to regular employment.”

The study focuses on two types of traineeships:

1. Open market traineeships³⁶
2. Traineeships that fall under Active Labour Market Policies³⁷.

Our interview questions are limited to these types of traineeships, and do not cover (1) work experience placements that are part of curricula of formal education or vocational education and training (e.g., student traineeships; apprenticeships); and (2) traineeships regulated under national law and whose completion is a mandatory requirement to access a specific profession (e.g., medicine, architecture, etc.).

Context, role & expertise

1. Please give an overview of your position, and areas of responsibility, focusing on aspects relevant to the implementation of traineeships.
2. What type of involvement have you had in designing, promoting, supporting and/or monitoring the implementation of the QFT at EU level?

Current situation and evolution since 2014

How prevalent are traineeships across the EU in general? How has this evolved over the past seven years? Are there specific sectors where traineeships are more prevalent?

1. What are the most common characteristics of young trainees across the EU? (e.g., sex, age, education background, socioeconomic background, ethnic minority status). How has this evolved over the past seven years?
2. What are the key trends in terms of working and learning conditions of trainees across the EU?
3. What is the public debate in the EU, about the role of traineeships and the importance of their quality for young people? Has this debate evolved since the launch of the QFT in 2014?

Relevance

1. To what degree are the QFT principles overall relevant for fostering the stable labour market integration of young people?

OR: To what degree is establishing quality standards for traineeships relevant for fostering labour market integration of young people?

- a. Are they appropriate for all young people? *Prompt: what about those with fewer opportunities?*

³⁶ Open market traineeships are defined as non-mandatory, bilateral, and private agreements between a trainee and a traineeship provider. They do not have a formal connection to education or training. Their main beneficiaries are students, graduates, or employees seeking practical training on the job.

³⁷ ALMP-type traineeships are offered to (young) unemployed or those at risk of becoming unemployed, and there is usually a public institution (most often a PES) acting as an intermediary between the training provider and the trainee.

2. How well do the principles of the QFT still correspond to needs within the EU? *Prompt: e.g., in light of the impact of Covid 19 and the changing labour market?*

OR: To what degree does establishing quality standards for traineeships correspond to needs within the EU today?

3. To what extent do the QFT principles respond to the concern that traineeships may be used to replace regular employment for young people?

OR: To what extent does establishing quality standards for traineeships address the concern that traineeships can be used to replace regular employment for young people?

4. How well does the nature of the QFT as a non-binding policy correspond to the needs and socio-economic problems to be tackled? Has this changed over time, and does it differ between Member States?

Effectiveness

1. To what extent have the principles of the QFT been transposed/enshrined in national legislation across the EU? Did this occur before or after the QFT (2014)?
 - a. Have any principles been more challenging for Member States to transpose than others?
 - b. What have been the obstacles to the full transposition and implementation of the QFT in Member States?

OR: To your knowledge, have Member States adopted legislation/national frameworks on traineeships over the past few years?

What are the main obstacles of regulating traineeships? Is there any aspect that is particularly challenging? If so, why and for whom?

1. To what degree have enforcement or monitoring mechanisms been put in place to ensure compliance with national legislation/quality frameworks? How effective have they been? Is there any evidence of negative effects of enforcement/monitoring?
2. What has been the impact of the implementation of the QFT on trainees in the EU? Which specific elements of QFT implementation have had the most positive/negative impacts on trainees and why?
 - a. Are there any sub-groups of trainees/potential trainees (e.g., sex, age, education background, socioeconomic background, ethnic minority status) for which the QFT has been less or more effective? If so, which and why?

OR: What has been the impact of regulating /establishing quality standards for traineeships on trainees? What elements of such regulation have had the most positive/negative impacts?

3. What has been the impact of QFT implementation on traineeship providers/employers? Have specific elements of QFT implementation had particularly positive or negative impacts and why?

OR: What has been/can be the impact of regulating /establishing quality standards for traineeships on traineeship providers/employers?

4. Are there any types of traineeship providers/employers or sectors for which QFT implementation has been more or less effective?
5. Has traineeship quality in the EU since 2014 evolved in line with expectations when the QFT was developed? Please explain your answer.

6. What are the main obstacles which prevent employers from offering quality traineeships? What support do they need to overcome these obstacles?
7. Are there any missing principles that would make the QFT more effective? Which? How would these make a difference to traineeship quality? *Prompt e.g., pay, access to health insurance, etc*

OR: What do you think are the key elements to ensure that traineeships are of good quality? How would these make a difference to trainees and traineeship providers?

8. Are you familiar with the European Framework for Quality and Effective Apprenticeships (EFQEA)? If so, in comparison to the EFQEA's achievements in the field of apprenticeships, to what degree has the QFT been effective in improving the quality of traineeships and the employability of trainees? In what ways and why?

Efficiency

1. In your view, which stakeholders have incurred additional costs associated with implementation of or compliance with the QFT?
 - a. Please think about the following types of stakeholders and potential costs incurred:
 - i. EU level institutions (e.g., financial subsidies; monitoring costs)
 - ii. National level institutions (e.g., financial subsidies; administrative burden of transposing QFT principles; monitoring costs; staff costs; training costs)
 - iii. Social partners (guidance and awareness-raising costs, training costs)
 - iv. Employers (e.g., HR and training costs; advertising costs; costs associated with rights and benefits trainees are entitled to)
 - v. Young trainees (e.g., transportation and living costs; materials)

OR: In your view, which stakeholders bear the costs of implementing quality traineeships? What type of costs are they?

2. What type of costs are they?
3. Compared with the overall costs of regulating and/or providing traineeships before the QFT, how significant would you say these *additional* costs have been?
4. In your view, to what extent are the costs proportionate to the benefits achieved? Is there scope for lowering costs?
5. Would you be able to share any literature or data sources on costs?
6. Are you aware whether financial incentives have been made available to employers by Member States to increase the number or quality of traineeships? Have any EU funds contributed to these financial incentives?
7. Do you think QFT implementation has benefitted young people? If so, how? *Prompt. E.g., by increasing the number of quality traineeship offered to them/through better learning content/improved working conditions/increased skills recognition*

OR: Do you think ensuring quality traineeships benefits young people? If so, how?

8. Do you think QFT implementation has benefitted employers/traineeship providers? If so, how? *Prompt: E.g., by improving their reputation as quality traineeship providers/employers, providing them with a more diverse, young workforce, resulting in tax exemptions/reductions and/or access to subsidies?*

OR: Do you think ensuring quality traineeships benefits employers/traineeship providers? If so, how?

9. Are there any wider benefits of QFT implementation for society at large? *Prompt: For example, do you think QFT implementation has contributed to tackling youth unemployment/easing young people's school-to-work transitions/increasing young people's employability/fostering social inclusion for youth/reducing welfare costs/increasing tax revenue?*

OR: Are there any wider benefits to ensuring quality traineeships for society at large?

Coherence

1. To what extent has the implementation of the QFT in the context of ALMP traineeships been coherent with EU policies, programmes, and financial instruments on education and training, employment, and social policies? *(prompt: e.g., Youth Guarantee, EFQEA, EURES, ESF, YEI, Erasmus+ etc)*? Are there any synergies? Are there any conflicts or duplication?
 - a. What about implementation of the QFT in the context of open market traineeships?

EU added value

1. In your opinion, what additional value has been generated from the QFT at the EU level compared to what could have been expected by Member States acting alone?
2. What would be the most likely consequences of discontinuing the QFT at EU level?
3. What would be the most likely consequences of continuing QFT implementation as at present?

Final questions

1. Are there any policy documents, evaluation studies, or monitoring information relevant to the topic that you can share with us?
2. Do you have any recommendations for other stakeholders we should consult?

Appendix 6: Case study reporting template

In yellow are additional elements that you are requested to focus on in our research based on data gaps in the evidence base of the study so far.

Country:

Title:

1. National(regional) operational context (0.5 pages)

*This section provides an **overview** of the current situation and developments 2014-2021 within the country (region) on traineeships. It should be short and concise and create a clear narrative that provides context to the rest of the analysis in the report.*

1.1. Overview of the target population and the development of traineeships

- Brief presentation of the main trends (e.g., chronological order) since 2014 on youth employment in your country: mention scale of youth unemployment and any evolution to the nature/length of the school-to-work transition.
- Overview of prevalence of traineeships within your country, based as far as possible on statistics/surveys etc. including information on participation in ALMP and open market traineeships

1.2. National and regional legislation and policies relevant to quality traineeships

Please provide a brief overview of the national (regional) approach to regulating traineeships using the following guiding questions:

- What are the key national (and regional) legislative and policy frameworks governing OMT and ALMP traineeships in your country? (*Please summarise what is in the mapping matrix in narrative form*)
- Have there been any reforms/changes in this legislation/policy in the period 2014-20? If yes, please describe the reforms/changes briefly, particularly paying attention to any changes that address the principles outlined in the QFT. (*Please summarise what is in the mapping matrix in narrative form*)

1.3. Stakeholder views on traineeships

- What are the main views/positions on traineeships of employers/employer organisations in your country over the period 2014-20?
- What are the main views/positions on traineeships of trainees/young people in your country over the period 2014-20?
- If there are any strong positions/views of other stakeholders on traineeships, please summarise them here.

2. Actions taken in response to the QFT (3 pages)

This section focuses on outlining what actions in general have been taken to implement the QFT or quality traineeship standards in your country, highlighting any good or bad practices and providing an overall expert assessment based on your research on the impact and influence of the Council Recommendation on national action in the field of quality traineeships.

2.1. National approach to QFT

*This section should provide an overview of the national approach to implementing the **principles** of the QFT, including an overview of the regulatory approach taken, the number of principles taken up and which ones, and the success so far in implementing, enforcing and monitoring delivery of the QFT. It should be a summary of the work you have conducted for the mapping matrices.*

2.2. Practical examples of QFT implementation that enhance or hinder trainees' school to work transition

This section should provide examples of good and bad practices in relation to the implementation of the QFT (at least 1-2), such as new legislation or collective bargaining agreements, reforms to existing

labour law, financial subsidies to encourage or facilitate participation, incentives to support businesses to raise traineeship quality), including quantitative and qualitative data evidence to support findings. **Please explain what you consider as good / bad practice in terms of how do they improve / decrease the quality of traineeships.**

Please include findings of the focus groups (i.e., trainees) if conducted.

2.3. Impact / influence of the Council Recommendation

This section should provide an overall assessment of the impact/influence that the Council Recommendation had on the design and delivery of approaches to ensure quality traineeships within the MS at national/regional/ local/initiative level.

3. Key evaluation findings (3 pages total)

This section is the analytical section of the case study and should answer all research questions, drawing out challenges, enablers, lessons learned etc. Particular attention should be paid to drawing out the views of key stakeholders in particular traineeship providers and trainees/young people.

3.1. Relevance (approx. 0.5 pages)

This section should outline your expert assessment, based on evidence gathered, on the relevance of the QFT to the needs of the target group and the context in your country. The following guiding questions should be used as a basis for assessing relevance:

- To what extent are the QFT principles appropriate in getting young people into sustainable and quality employment in your country (region)? Which principles have been the most and least important?
- Has the understanding of traineeship quality evolved over time? For whom: trainees, employers, PES, decision makers...?
- To what extent are the QFT principles **still** relevant to socio-economic needs and problems in your country (region)? Please reflect also on the impact of the Covid-19 pandemic on this relevance.
- What additional dimensions could be included in the QFT to increase its relevance?

3.2. Effectiveness (approx. 1 page)

This section should provide your expert assessment, based on evidence gathered, on the extent to which the principles of the QFT have been implemented, enforced and monitored in your country and the impact on trainees, employers and other stakeholders. In particular, the following questions should be answered:

- To what extent have the principles of the QFT been enshrined in and/or influenced national legislation/policy in your country since 2014? Which principles in particular and why?
- What types of legal implementation tools/regulatory approaches have been used to do enshrine these principles?
- To what extent does enforcement and/or regular follow-up monitoring of the QFT principles exist in your country?
- **Are there are sectors or (social) groups of young people for whom QFT has been particularly successful or unsuccessful?**
- What have been the obstacles to the full transposition and implementation of the QFT in Member States?
- What is the impact of the QFT on trainees? Have there been any adverse or negative effects on trainees?
 - o Is there any evidence of the QFT or quality standards for traineeships reducing the offer of traineeships?
 - o **Is there any evidence of traineeships replacing regular entry-level jobs for young people? Does the QFT respond to this concern?**

- **Cross-border traineeships:** To what extent has your country facilitated the cross-border mobility of trainees in the EU? Has the EURES network been used in this regard?

- **Cooperation:** To what extent has your country promoted the active involvement in applying the Quality Framework for Traineeships of the following stakeholders:

- o social partners?
- o employment services?
- o educational institutions?
- o training providers?

3.3. Efficiency (approx. 0.5 pages)

This section should provide your expert assessment, based on evidence gathered, on the degree to which the QFT is efficient, including an overview of the types of costs associated with implementing the QFT for different stakeholders, the role of EU funding, and the benefits for different stakeholders. See [Tool 56 \(of the Better Regulation Guidelines\)](#). Please see the additional guidance sent with this template on gathering quantifiable costs and benefits

- What costs are associated with the implementation of the QFT for the following stakeholders:

- o National authorities
- o Traineeship providers
- o Public Employment Services

- What are the quantifiable costs for traineeship providers that can be linked to the QFT? Please provide a figure even if it is an estimate/proxy.

- What are the quantifiable benefits for the different stakeholders: traineeship providers, young people and for society at large that can be linked to the QFT? If no information is available linked to the QFT specifically, please outline quantifiable benefits linked to quality traineeships.

- To what extent are administrative costs assessed to be proportionate to benefits of QFT implementation?
- To what extent has your country (region) encouraged traineeship prevalence and quality through financial incentives to employers/traineeship providers? Please provide details on the amount and the conditions for such incentives.
- What are the main obstacles preventing employers from offering quality traineeships?
- What is the role of EU funding support, such as the Youth Employment Initiative or the European Social Fund, in providing quality traineeships?

3.4. Coherence (approx. 0.5 pages)

This section should provide your expert assessment, based on evidence gathered, on the degree to which the QFT is coherent with other policies in your country and in the EU on youth/employment/school-to-work transition, by answering the following questions:

- To what degree does the QFT support and complement social/ educational/ employment/ training policies in your country? In what ways? Are there any conflicts? E.g., you may refer to non-compliance and/or partial compliance of national (regional) legislation and/or implementation with certain QFT principles
- To what degree has the implementation of the QFT (objectives, target groups and measures) been coherent with relevant EU initiatives (e.g., Youth Employment Support, EURES, European Solidarity Corps, Youth Guarantee)? Are there any overlaps/conflicts?

3.5. EU-added value (0.5 pages)

This section should provide your expert assessment, based on evidence gathered, on the degree to which the QFT has generated added value and the nature of this value. Please answer the following questions:

- What additional value has been generated from the QFT compared to what have been achieved by your country acting along national/regional levels?
- Volume effects: To what degree has the QFT led to more quality traineeships being implemented in your country?
- Scope effects: To what degree has the QFT broadened the focus of existing national/regional measures to include new areas/target groups?
- Role effects: To what degree has the QFT led to structural changes in employment/education/training policy or frameworks at national level?
- Process effects? Is there evidence of benefits to organisations implementing frameworks or delivering traineeships (training providers, employers, PES, monitoring bodies) from being involved in QFT implementation?
- What will be the likely consequences of discontinuing the QFT at EU level and most likely prognosis of 'no-policy-change' scenario?
- Has EU support through monitoring the QFT (through the Employment Committee) been useful in implementing the QFT?
- Has EU support through sharing best practices and through mutual learning activities been useful in implementing the QFT?

Annexes

Bibliography

List of interviewed stakeholders

Focus group participants

Annex 2: Further evidence on the degree of implementation of the QFT

1. Analysis of the degree of implementation of each principle of the QFT in national legislation

This section provides further analysis of the degree of implementation of each principle of the QFT in national legislation, in addition to the Tables presenting this in Section 3.2.1 in the final report.

Trainees' rights and working conditions are respected, including limits to max weekly working time, weekly rest periods, minimum holiday entitlements. This principle is implemented in 18 Member States in legislation governing open market traineeships and all 27 Member States for ALMP traineeships. A majority of Member States comply with this principle and apply to traineeships the same working conditions applicable to any types of employment relationships. It is worth noting that in Romania, the legislation further specifies that trainees should not be involved in tasks other than the ones related to the traineeship and stipulates penalties for employers that do not respect this working condition. A smaller number of Member States implement the principle through requiring traineeship providers to clarify if they provide trainees with health and accident insurance or sick leave (e.g. BG, EL, ES, HU, LU, SI).

The traineeship is based on a written agreement. This is implemented in 16 Member States in legislation governing open market traineeships and 26 Member States for ALMP traineeships. In a vast majority of Member States therefore, the national legal frameworks that exist to regulate traineeships stipulate those traineeships should be based on a written agreement.

The written agreement indicates key information including educational objectives working conditions, if compensation is provided and how much, rights/obligations of all parties, and the duration. This is implemented in 17 Member States in legislation governing open market traineeships and 27 Member States in ALMP traineeships. For open market traineeships, a majority of Member States stipulate that the written agreement should include key information on the trainees rights and the conditions of the traineeship. For example, the **Bulgarian** Labour Code¹ provides that the written contract shall specify the nature of the work, the date of the traineeship, the remuneration, the duration of work time, the conditions for termination and how practical skills should be acquired. It should be noted however, that in Member States that largely comply with this principle, there is no requirement regarding educational objectives to be included in written agreements. This is the case in **Lithuania** and **Poland**, for example. In Member States where specific types of open market traineeships are regulated, legislation may impose that the written agreement is signed by a third party (e.g. university for extracurricular university traineeships in Spain²) or notified to the PES.

Similarly, for ALMP traineeships, even in Member States where a written traineeship agreement is a formal requirement, the agreement often does not cover all elements called for in the QFT. For example, in **Hungary** according to Article 25 of the Labour Code, such an agreement includes the required aspects, including the specification of an allowance or a compensation, except for educational objectives which are not defined. Interestingly, in several Member States the agreement is agreed among the relevant national authority and the employer and not between the trainee and traineeships provider personally; moreover in such cases salary is sometimes paid by the relevant national authority, and not the employer itself (e.g. DK, EE).

¹ Кодекс на Труда - Labour Code (LC), State Gazette No. 28, March 24th 2020, available at <https://www.az.government.bg/web/files/PageFile/74/13777/kodeks-na-truda.docx>, Unofficial English translation available at [https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/61136/119317/F134436446/BGR-61136%20\(EN\).pdf](https://www.ilo.org/dyn/natlex/docs/ELECTRONIC/61136/119317/F134436446/BGR-61136%20(EN).pdf).

² Articles 7 and of Royal Decree 592/2014).

Traineeship providers include in their vacancies information on the conditions of the traineeship. Six Member States do not implement this at all in open market traineeships and nine in ALMP traineeships. Across Member States, traineeship providers are generally not required to include information in their vacancies on the conditions of the traineeship. The reasons for this are twofold. Firstly, in some Member States (such as DK, EE, LV and SI) vacancies for ALMP traineeships are not available as trainees find vacancies through a PES consultant on a case-by-case basis. Secondly, in other Member States it is not compulsory to provide details about the objectives and the requirements of an ALMP or an open market traineeship (e.g. FR, IE, IT, LT, HU). Nevertheless, it was identified that in a few Member States the responsible national authorities check ALMP vacancies and ensure required details are provided before being published (e.g. BG, HR, CZ, PL) and thus ensure full compliance with this principle. For example, in **Croatia**, ALMP measures and the conditions for using the funds and implementation rules shall be adopted annually by the PES Administrative Council, that also checks the vacancy to ensure all required information is provided.

The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate. Six Member States do not implement this at all in open market traineeships and seven in ALMP traineeships. Examples of where this is legally implemented include Greece, where knowledge, skills and competences should be recognised and the certification procedure should be described in the announcement of traineeship programmes (for ALMP traineeships). In the cases of continuing vocational training programmes, where the context of certification is not provided, trainees receive a certificate of completion.³ The national guidelines in Italy specify that the knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider and the traineeship promoter through an assessment of all gathered evidence collected in an individual file and a certificate is provided.⁴ For open market traineeships, in Slovenia, the Employment Relationships Act⁵ stipulates that the trainee shall pass an examination at the end of the traineeship. In Portugal it is only provided that the results obtained by the trainee should be evaluated, without any specification regarding certificate.⁶

Tasks allow the trainee to work towards their learning and training objectives. Six Member States do not implement this at all in open market traineeships and one in ALMP traineeships. Specific requirements ensuring that trainees work towards learning and training objectives and are assigned a supervisor are limited. Exceptions include the law in **Romania** (Law 335/2013) which imposes specifically to the mentor to explain the assigned tasks and provide support to the trainee during their traineeship. Learning objectives are also discussed and agreed at the beginning of the traineeship and additional training can be considered throughout the duration of the traineeship. In other Member States, this principle is implemented more broadly. For example, in **Lithuania**, the nature of the activities should be included in the written agreement but there is no specific regulation stipulating that the trainee should work towards learning and training objectives. In some Member States (e.g. EL, HU, IE, PL), the QFT principle regarding learning and training objectives and an assigned supervisor are not implemented in the legal framework at all.

In relation to the duration of the traineeship being limited to 6 months, in open market traineeships only 10 Member States comply with this limitation of 6 months for the duration of the traineeship. While in some countries, such as Greece and Ireland, there is no legal limit for the duration of the traineeship, in others, traineeships exceeding 6 months are explicitly included in the legislation. This is the case in particular in **Bulgaria**, where the Labour Code indicates that traineeships cannot be less than 6 months and not more than 12 months. On the other hand, a minority of Member States regulate that traineeships should not exceed 6 months (e.g. LU, RO), or even include a shorter duration (e.g. 3 months in **Poland**). Regarding termination of the traineeship,

³ Ministerial decision 79732 of 27.07.2022.

⁴ LG 2017, § 7, 9, 11.

⁵ Employment Relationships Act (ERA – 2013) (Official Gazette of the Republic of Slovenia, No. 21/13, 78/13 - amended, 47/15 - ZZSDT, 33/16 - PZ-F, 52/16, 15/17 - US decision, 22 / 19 - ZPosS, 81/19, 203/20 - ZIUPOPDVE, 119/21 - ZČmIS-A, 202/21 - odl. US in 15/22), available at <http://www.pisrs.si/Pis.web/pregledPredpisa?id=ZAKO5944#>.

⁶ Article 7c of the Decree Law 66/2011

in a large number of Member States, the conditions regarding the termination of the traineeship are included in the written agreement (e.g. BE, BG, HU, LT, PL, PT, RO, SI).

In ALMP traineeships, 16 Member States respect the limit of 6 months. For example, In **Estonia**, the duration of work practice shall be up to four months.⁷ Other Member States envisage the traineeships to last for up to nine months (e.g. HU, BG, PT) or one year (e.g. HR, IT, PL). In **Bulgaria**, employers can receive subsidies for up to 9 months for providing a traineeship placement for one person.⁸ Several Member States provide no information on the possibility of extension of the traineeships beyond the set time limit (e.g. EE, HU, EL); while others do (e.g. CY, DK, FI, RO, SI). In **Denmark**, the traineeship is usually established for 4 weeks and in some cases it can be extended to 26 weeks,⁹ in **Romania** the only possible way of extension is if the contract was interrupted due to sick leave – in which case an extension of up to 6 months can be granted;¹⁰ whereas in **Finland** it is explicitly made clear that there are no conditions under which a traineeship can continue, meaning it cannot be extended. In some Member States (BG, IT, RO, SI) it is also necessary to provide information on how the trainee/traineeship provider can terminate the agreement. In **Bulgaria**, information on how the trainee/traineeship provider can terminate the written agreement is regulated through Article 334 of the Labour Code, as trainees are hired on a standard employment contract. In Italy, the national guidelines also clarify how and when a traineeship can be terminated,¹¹ whereas in **Slovenia** conditions are determined in the tripartite contract between PES, trainee and traineeship provider. A good example of fully compliant framework, in relation to all three above-mentioned aspects (duration, extension and termination) is **Latvia**. Specifically, the Latvian framework is fully compliant as the duration of traineeship does not exceed four months,¹² the conditions for its extension are clarified,¹³ and employer and trainee can terminate the agreement according to conditions set forth in the applicable regulations.

2. Evidence from labour market review of traineeship vacancies

In the labour market review, we analysed the alignment of current traineeship vacancies with the principles of the QFT which can be implemented through national legislation and/or quality frameworks governing traineeships (see Table 1 below). The analysis of traineeship vacancies thus focused on three main areas: the transparency of the vacancy, the duration of the traineeship and the working conditions set out in the vacancy.

Table 1. Principles assessed in the labour market review

Principle		Principle no. (study numbering)
Transparency	Traineeship based on a written agreement	1

⁷ Paragraph 3, § 15 of the Labour Market Services and Benefits Act, Tööturuteenuste ja -toetuste seadus, available at: <https://www.riigiteataja.ee/en/eli/ee/510032022003/consolide/current>.

⁸ Article 41 of the Employment Promotion Act, State Gazette No 21. March 12th 2021, available at <https://www.az.government.bg/web/files/PageFile/74/16816/zakon-za-nasyrchavane-na-zaetostta.pdf>; Employment Promotion Act (Unofficial English translation) State Gazette No. 54/17.07.2015, available at <http://www.ilo.int/dyn/natlex/docs/MONOGRAPH/60386/134944/F1134714288/BGR60386%20Eng.pdf>.

⁹ Act on Active Employment Efforts, Lov om aktiv beskæftigelsesindsats LOV nr 548 af 07/05/2019, available at <https://www.retsinformation.dk/eli/lt/2019/548>.

¹⁰ Law 335/2013, GO 473/2014.

¹¹ LG 2017, § 2.

¹² Regulations of Cabinet of Ministers # 75/25.01.2011, point # 109.1

¹³ Regulations of Cabinet of Ministers # 75/25.01.2011, point # 109.10.

	Mentioned health insurance	6
	Mentioned accident insurance	
	Mentioned sick leave	
	Mentioned allowance or compensation for work during the traineeship	7
	Mentioned the amount of allowance or compensation	
	Traineeship provider gives information on recruitment policies, including the share of trainees recruited in recent years	8
Duration	Mentioned duration of the traineeship	9
	Mentioned the conditions for an extension or renewal of the traineeship	10
		11
Working conditions	Mentioned the goals of the traineeship / the range of responsibilities	3
	Mentioned information about working time limits (maximum weekly working time, minimum daily and weekly rest periods)	5
	Mentioned information about minimum holiday entitlements	
	Mentioned assigning a supervisor for the trainee	4
	Clarified learning and training objectives	2
	Traineeship provider will attest to traineeship through a certificate	12

Source: Ecorys, 2022

We collected and analysed 1,972 traineeship offers in 27 EU Member States: 1,272 open market traineeship vacancies and 700 ALMP traineeship vacancies. In the final phase of the research process, after triangulation by the core research team and final review by the national experts, a total of 1,696 vacancies offers were included: 996 open market and 700 ALMP traineeships. The results of the analysis are presented in Table 2 and Table 3 below, and are followed by a detailed analysis of the level of alignment with the specified QFT principles.

Firstly, Table 2 below provides an overview of the overall outcomes of the labour market review, in terms of degree of alignment (expressed in percentage terms) of the reviewed traineeship vacancies with the QFT principles which can be implemented through national legislation and/or quality frameworks governing traineeships. The table presents the results for both OMT and ALMP traineeships.

Table 2. The overall outcomes of the labour market review: OMT and ALMP traineeship vacancies

QFT principles which can be implemented through national legislation and/or quality frameworks governing traineeships		OMT	ALMP
Transparency	Traineeship based on a written agreement	82%	88%
	Mentioned health insurance	10%	4%

	Mentioned accident insurance	5%	10%
	Mentioned sick leave	2%	2%
	Mentioned allowance or compensation for work during the traineeship	42%	59%
	Mentioned the amount of allowance or compensation	21%	44%
	Traineeship provider gives information on recruitment policies, including the share of trainees recruited in recent years	9%	23%
Duration	Mentioned duration of the traineeship	37%	60%
	Mentioned the conditions for an extension or renewal of the traineeship	14%	8%
Working conditions	Mentioned the goals of the traineeship / the range of responsibilities	89%	86%
	Mentioned information about working time limits (maximum weekly working time, minimum daily and weekly rest periods)	23%	31%
	Mentioned information about minimum holiday entitlements	2%	2%
	Mentioned assigning a supervisor for the trainee	11%	8%
	Clarified learning and training objectives	62%	42%
	Traineeship provider will attest to traineeship through a certificate	9%	3%

N= 1696. ALMP n=700 and OMT n=996; Source: Ecorys, 2022

Next, Table 3 sets out the results by country of the analysis of the alignment of traineeship vacancies with the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships. The Table presents the percentage range of traineeship vacancies for which each specified QFT principle was addressed by the traineeship providers in each country. The results are presented separately for open market and ALMP traineeships.

Table 3. Results of the labour market review by country

QFT principles which can be implemented through national legislation and/or quality frameworks governing traineeships		OM traineeships				ALMP traineeships			
		% of traineeship vacancies in which were presented the QFT principles				% of traineeship vacancies in which were presented the QFT principles			
		0-24%	25-49%	50-74%	75-100%	0-24%	25-49%	50-74%	75-100%
Transparency	Traineeship based on a written agreement		AT	BG, HR, FI, DE,	BE, CY, EL, HU, IE, LT, LU, NL, RO, ES, PL			HR, DE, IT, NL, ES, SE	BE, FI, FR, EL, IE, LU, PT, SK, SI, PL
	Mentioned health insurance	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, RO, ES	PL			BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, SK, SI, ES, PL, SE			
	Mentioned accident insurance	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, PL, RO, ES				BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, SK, SI, ES, PL, SE			PT
	Mentioned sick leave	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU,				BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, SK,			

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		NL, PL, RO, ES				SI, ES, PL, SE			
	Mentioned allowance compensation or for work during the traineeship	HR, DE, EL, LU	BG, CY, FI, HU, IE, ES,	BE, LT, NL, RO, PL,	AT	HR, IE, LU	FR, DE, IT, SI, SE	BE, EL, NL, ES	FI, PT, SK, PL
	Mentioned the amount of allowance or compensation	BE, BG, HR, CY, FI, DE, EL, HU, IE, LU, PL, RO, ES	NL,	LT,	AT	BE, HR, DE, IE, LU, SI, SE	FR, EL, IT, NL, ES		FI, PT, SK, PL
	Traineeship provider gives information on recruitment policies, including the share of trainees recruited in recent years	BE, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, PL, RO, ES	AT, BG			BE, HR, FI, FR, DE, IE, IT, NL, PT, ES, PL, SE	EL	SK	PL, LU, SI
Duration	Mentioned duration of the traineeship	EL, HU, IE, LU, PL	BE, BG, HR, CY, FI, HU, NL, ES	AT, DE, LT, LU, RO		HR, ES	DE, EL, IE, NL	BE, FI, FR, IT, SK, SE	LU, SI, PT, PL
	Mentioned the conditions for an extension or renewal of the traineeship	AT, BE, CY, FI, DE, EL, HU, IE, LT, LU, NL, PL, RO, ES	BG, HR, FI,			HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, SI, ES, PL, SE	BE, SK		
Working conditions	Mentioned the goals of the traineeship / the range of responsibilities			FI, EL,	AT, BE, BG, HR, CY, DE, HU, IE, LT, LU, NL, RO, ES, PL	PT		EL	BE, HR, FI, FR, DE, IE, IT, LU, NL, SK, SI, ES, PL, SE

STUDY SUPPORTING THE EVALUATION OF THE QUALITY FRAMEWORK FOR TRAINEESHIPS

	Information about working time limits mentioned (maximum weekly working time, minimum daily and weekly rest periods)	BE, BG, HR, CY, FI, DE, EL, LT, LU, ES	AT, IE, NL, RO, PL	HU		HR, FI, IE, PT, SI	BE, FR, DE, EL, LU, NL, SK, ES	IT, SE	PL
	Mentioned information about minimum holiday entitlements	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, PL, RO, ES				BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, SK, SI, ES, PL, SE			
	Mentioned assigning a supervisor for the trainee	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, RO, ES	PL			BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, ES, PL, SE	SK, SI		
	Clarified learning and training objectives		AT, BG, FI, EL, IE, LT, NL, ES, PL	DE, LU	BE, HR, CY, HU, PT, RO,	HR, FI, IT, NL, PT, ES, PL	DE, EL, LU	SK	BE, FR, IE, SI, SE
	Traineeship provider will attest to traineeship through a certificate	AT, BE, BG, HR, CY, FI, DE, EL, HU, IE, LT, LU, NL, PL, ES			RO	BE, HR, FI, FR, DE, EL, IE, IT, LU, NL, PT, SK, SI, ES, PL, SE			

Source: Ecorys, 2022

Based on the results of the labour market review of traineeship vacancies, the alignment of traineeship vacancies with the QFT principles is **higher in the case of ALMP traineeships than open market traineeships in the majority of Member States**. The PES are usually responsible for the organisation of ALMP traineeships and need to abide by certain regulations in the promotion of offers or in matching the trainee with the employer.

ALMP traineeship vacancies

We first set out the results of our analysis of the implementation of the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships in the offers reviewed for ALMP traineeships across the different Member States. We have grouped the results by Member States in which the ALMP traineeship offers had **high, moderate, low** and **very low** alignment with the examined QFT principles, as well as the Member States for which this analysis was not possible (together with the reasons for this).

Firstly, **high alignment of the ALMP traineeship vacancies examined with the QFT principles** which can be implemented by national legislation and/or quality frameworks governing traineeships (see Table 1 above) was observed in **one Member State**: DK. The Danish legal framework for ALMP traineeships is highly compliant with the QFT principles. Based on the labour market review of traineeship vacancies, 1 only principle considered in the review that is not addressed is that of providing a certificate upon completion of a traineeship. The ALMP traineeships are not publicly announced as vacancies on a particular website or on a job portal; instead, each traineeship is facilitated through the PES, to ensure the best match between the employer's and trainee's needs.

Next, **moderate alignment with the examined QFT principles was observed in ALMP traineeship vacancies in ten Member States**: BE, ES, FI, HR, IE, PL, PT, SI, SE, SK. In these countries, The ALMP traineeship vacancies reviewed were compliant with many of the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships, but not all. For example:

1. Most vacancies contained information about the written agreement: 100% of offers in BE, FI, IE, PT, SL, SI, PL, around 70% in SE, ES and 60% AT, HR.
2. The traineeship duration was mentioned in almost all offers from Portugal, Slovenia and Poland and around 60% from Belgium, Finland, Slovenia and Sweden.
3. The goals and/or the range of responsibilities of the trainee were presented in almost all offers from six countries (BE, HR, FI, IE, SE, SL) and in around 80% of offers in Slovenia, Spain and Poland.
4. The learning and training objectives were mentioned in 100% of analysed offers from Belgium and Ireland, in 90% of vacancies from Slovenia and Sweden and in 63% of Slovakian vacancies.
5. Information about the existence of an allowance/compensation for work undertaken by trainee was presented in all analysed vacancies from Finland, Portugal and Slovenia, and in 80% offers from Poland.
6. All Portuguese and Slovenian offers contained information about the amount of allowance/compensation for trainees' work. This information was provided in around 80% of offers from Belgium, Finland and Poland.
7. On the other hand, most traineeship offers did not present information about assigned supervisors, the conditions for an extension or renewal of the traineeship or recruitment policies of the organisation following the traineeship (BE, ES, FI, IE, PL, PT, SI, SE, SK). Slovenia was an exception in providing information about recruitment policies (more than a

90% of the analysed offers presented the employer's policy). However, those traineeship vacancies were advertised in EURES as well, where information on recruitment policies is needed.

8. In Polish traineeship offers, more than 80% of the vacancies reviewed presented information about working time limits.
9. In all countries with moderate alignment, traineeships that last longer than 6 months are possible.
10. In some countries, the ALMP traineeship vacancies were not publicly available on any website (ES)¹⁴ or presented only limited information for an external user who does not have full access to the PES portal (HR).

Low alignment with the principles of the QFT was observed in the ALMP traineeship vacancies analysed in five Member States: DE, FR, NL, IT, LU. ALMP traineeship vacancies examined were compliant with only some of the QFT principles in those countries. For example:

1. Almost all analysed traineeship vacancies in these countries contained information about the agreement, duration and the goals and/or the range of responsibilities (FR, DE, NL, IT, LU).
2. However, most traineeship vacancies reviewed did not mention the allowance or compensation for work (DE, IT, NL, LU). The exception is Luxembourg, where 100% of analysed offers contained that information.
3. The learning and training objectives of the trainee were provided in 100% of French vacancies analysed; in the other countries, less than 40% of offers presented this information.
4. The remuneration level was detailed in half of the French offers reviewed and in 31% of vacancies from Netherlands.
5. Only 15% of French traineeship offers examined included information about assigning a supervisor for the trainee.
6. Only a small proportion of reviewed vacancies presented the conditions for an extension or renewal of the traineeship and recruitment policies, including the share of trainees recruited in recent years (FR, DE, NL, IT).
7. Recruitment policies, including the share of trainees recruited in recent years, were presented in all analysed Luxembourg traineeship vacancies.
8. In the case of working time limits, only Italian traineeship offers contained this information (more than 70% of the analysed vacancies).
9. In all countries in this group, traineeships of longer than 6 months were possible.

Finally, **very low alignment between the analysed ALMP traineeship offers and the QFT principles was observed in one Member State:** EL. Although the QFT is partially enshrined in national law (as seen in section 3.2 of the report), the quality of ALMP traineeships in practice is very low and the ALMP traineeship vacancies examined were compliant with just a few of the QFT principles. For example: around 85% of the analysed offers contained information about the written agreement, and 74% about the goals and/or the range of responsibilities; the allowance or compensation for work was mentioned in 58% of collected vacancies; almost a half (47%) of the

¹⁴ * In Spain, ALMP traineeships vacancies are not posted on official web portals, but the exception is the webpage of Youth Guarantee, which posts occasionally some news on vacancies, however in a non-systematic way. The alignment of those ALMP traineeships vacancies with the QFT was checked.

offers presented working time limits and the amount of this allowance or compensation (43%); and more than 30% explained the recruitment policies (34%) or inform about the traineeship duration (36%). However, none contained information about assigning the supervisor, providing a certificate upon completion of the traineeship or the conditions for an extension or renewal of the traineeship. The ALMP traineeship may be longer than 6 months.

The **analysis of alignment was not possible in ten Member States** (AT, BG, CY, CZ, EE, ES, HU, LT, LV, MT, RO), as they either do not offer ALMP traineeships (CZ, CY, HU) or the vacancies are not publicly available (BG, ES, LT, MT, NL, RO). In **Czechia** and **Cyprus**, the Ministry of Labour liquidated the ALMP traineeships and abolished the organisation in charge of traineeships funded from the ESF (CZ), since the unemployment rates were relatively low, meaning that the youth could directly start working. In **Hungary**, the ALMP traineeships were phased out as a model. In six Member States, ALMP traineeship offers are not publicly available on any portal or job board. Instead, an organisation responsible for ALMP (mainly PES and Jobplus on Malta) matches trainees with traineeship providers in counselling processes on a case-by-case basis (BG, EE, ES, LT, LV, MT, NL). In **Romania**, PES offer ALMP traineeships, but the offers are not publicly available for external users. The access is granted only to PES clients. In **Latvia**, ALMPs vacancies are not publicly available, is due to the fact that vacancies must be applied directly to the SEA (PES) and relevant vacancies are selected at a special commission meeting. In **Spain**, ALMP-traineeships are managed by regional and national PES internally directly or through collaborating partners such as NGOs, Chambers, etc.) with the traineeship providers. Generally, ALMP traineeships vacancies are not posted on official web portals. The webpage of Youth Guarantee posts occasionally some information on vacancies, but in a non-systematic way.

Open market traineeship vacancies

Our research team also analysed the implementation of the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships in offers for open market traineeships across the different Member States. We have again grouped the results by Member States in which the reviewed traineeship offers displayed **high, moderate, low** and **very low** alignment with the examined QFT principles, as well as the Member States for which this analysis was not possible (together with the reasons for this).

High alignment of open market traineeship vacancies with the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships was not observed in any of the Member States.

Moderate alignment was observed only in Austria, where open market traineeship-vacancies are compliant to some extent with many QFT principles thanks to the existing legislative framework which was considered sufficient to provide good quality traineeships in alignment with the QFT. Most of the traineeship vacancies examined contained information about the goals and/or the range of responsibilities (97%), the allowance or remuneration (81%) and its amount (77%) and the duration (68%). Only half of the analysed traineeship offers presented information about the working time limits and agreement. The traineeship offers hardly ever included data about the conditions for an extension or renewal of the traineeship, minimum holiday entitlements and the assigned supervisor. Open market traineeships may last longer than 6 months.

Low alignment with QFT principles was observed in six Member States: BE, DE, ES, HU, LT, PL, RO. In these Member States, open market traineeship vacancies were only compliant with some of the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships. For example: almost all traineeship providers presented information about the agreement and the goals and/or the range of responsibilities (BE, DE, ES, HU, LT, PL, RO); the learning and training objectives of the trainee were presented in almost all vacancies from Belgium, Germany, Hungary and Romania and in around 40% of vacancies from Spain, Lithuania and Poland; and the information about the allowance and compensation for work and working time limit was provided in around half of the traineeship vacancies (BE, ES, LT, PL, RO). However:

1. The working time limits were provided in around half of the offers from Germany, Lithuania and Romania.
2. Information about the assigned supervisor was presented in around 20% of offers from Belgium, Hungary, Poland and Romania.
3. The traineeship offers rarely included information about the conditions for an extension or renewal of the traineeship, minimum holiday entitlements and the recruitment policies, including the share of trainees recruited in recent years.
4. Only Romanian traineeship offers presented information about the certificate of completion (100% of analysed vacancies).
5. The duration of the traineeship was provided in less than half of the analysed traineeship offers and the OMT may last longer than 6 months (DE, ES, HU, LT, PL, RO).

Finally, very low alignment was observed in eight Member States: BG, HR, CY, FI, EL, IE, LU, NL. Vacancies were compliant with just a few of the QFT principles which can be implemented by national legislation and/or quality frameworks governing traineeships, for example:

1. The information about the goals and/or the range of responsibilities of the trainee was presented in almost 100% of vacancies from Cyprus and Luxembourg, in around 80% from Bulgaria, Croatia, Netherlands and Ireland and in 60% from Finland and Greece.
2. The written agreement was presented in almost all vacancies from Cyprus, Greece, Ireland and Luxembourg, in 80% of analysed vacancies from the Netherlands and in around 70% of offers from Bulgaria, Croatia and Finland.

However, many of the QFT principles examined were absent in these Member States, for example:

1. Information about an allowance and/or compensation for work was provided in 60% of vacancies from the Netherlands and in less than 50% of the traineeship offers from seven countries (BG, HR, CY, FI, EL, IE, LU).
2. Similar results were observed in relation to data about the duration of traineeships.
3. The amount of allowance or compensation was mentioned in only 35% of vacancies examined from the Netherlands and in less than 20% of offers from Bulgaria and Ireland.
4. The analysed offers only rarely contained information about the conditions for an extension or renewal of the traineeship. This was provided in 47% of Finish offers and in around 30% of the Bulgarian and Croatian offers.
5. Recruitment policies were provided in 35% of the Bulgarian traineeship offers and around 20% of the Cypriot and Finnish offers.
6. The assigned supervisor was mentioned in around 15% of the offers (BG, CY, IE, NL, HR, LU).
7. Only small numbers of traineeship offers provided information about the minimum holiday entitlements and attesting the traineeship through the certificate (BG, HR, CY, FI, EL, NL, IE, LU).

The analysis of alignment was not possible in eleven Member States (CZ, DK, EE, FR, IT, LV, MT, PT, SI, SE, SK). In **Italy** and **France**, open market traineeships are forbidden by law. In the **Czech Republic** and **Slovakia** open market traineeships are rare as employers hire and train youth without this intermediate stage (traineeships). In **Denmark**, OM traineeships are not very popular among employers who prefer PES services or to design and developing company-specific traineeship programmes. Furthermore in Denmark, traineeships are more commonly undertaken as part of formal education programmes. In **Slovenia**, the OMTs are organised through the regular

employment contracts, with no elements that would allow to distinguish the traineeship employment contracts from the regular fixed-term employment contracts, so the OM traineeships are not a really prevalent practice, as employers rather offer regular employment with the test period, rather than paid traineeships. In **Sweden**, OMTs prevalence is modest as they are not popular among trainees and traineeship providers. The culture of OMTs has not been developed in the Swedish labour market. In **Estonia**, **Latvia**, **Malta** and the **Netherlands**, open market traineeship prevalence is modest as well and, generally, there are no open market traineeship vacancies advertised in the labour market. Therefore, in those countries, the alignment of open market traineeship vacancies with the QFT cannot be measured.

3. Evidence on obstacles faced by employers and national authorities

Through desk research and interviews, national experts analysed the types and degree of obstacles faced by both employers and national authorities involved in traineeships when offering traineeships in line with the QFT. The results of this analysis are presented in detail below, by each type of traineeship.

For open market traineeships, a lack of relevant legislation governing open market traineeships or the preference of employers towards using subsidised traineeship schemes (which are part of ALMPs) instead of investing in company traineeship programmes could be further seen as obstacles to implementing the QFT principles for this type of traineeship. On the other hand, the specific legal requirements governing ALMP traineeships in EU Member States (regarding duration, eligibility criteria, subsidy levels, etc.) may discourage employers from accepting trainees. Additionally, limited resources of PES to support the promotion and organisation of traineeships at SMEs or communication and cooperation problems between PES and employers are further affecting traineeship quality in some countries. Finally, the COVID-19 pandemic and a shift to telework have also recently emerged as a significant obstacle to offering quality traineeships (both open market traineeship and ALMP traineeships) by employers in EU Member States. The pandemic increased the level of economic uncertainty and caused new challenges for business operations, e.g. difficulties with online onboarding and supervision of trainees.

Open market traineeships

In the case of open market traineeships, the study identified the existence of a range of obstacles faced by employers and national authorities. The range and severity of these obstacles however differs across the EU Member States. To present this diversity, we have categorised the Member States in four groups: (i) those with several major obstacles to implementation; (2) those with some major obstacles (but less numerous than the first group); (3) those with minor obstacles; and (4) those with no (or very limited) obstacles.

Firstly, **several major obstacles** preventing employers from offering quality traineeships in line with the QFT recommendation were evidenced in three EU Member States (BG, EL, HR):

1. In **Bulgaria**, open market traineeships are sometimes misused by employers due to the low awareness of trainees about their rights and the unfavourable labour market situation. SMEs face particular challenges in providing trainees with mentors and specifying the learning content of the traineeship due to their limited financial and human resources. The lack of monitoring and systematic evaluation of the quality of these traineeships additionally discourages employers from offering them.
2. In **Greece**, traineeship contracts do not exist in national legislation. Instead, companies hire trainees based on employment contracts. In such situations, employers prefer subsidised

vocational training programmes instead of investing in their own traineeship programmes. In the case of such programmes, however, the remuneration of trainees is considered a subsidy from the state to companies and thus falls within the “de minimis” rule. This results in a low prevalence of open market traineeships in the country.

3. Similarly, in **Croatia**, the existence of a subsidised traineeship measure (called “SOR”) is the main obstacle to offering open market traineeships which are compliant with the QFT quality principles.

Secondly, in three other EU Member States (ES, LV, PL), obstacles to the implementation of quality open market traineeships were found to be major but not as numerous:

1. As in Bulgaria, the awareness of QFT principles among relevant stakeholders and the overall traineeship culture are also lacking in **Spain**. Employers do not acknowledge the benefits of traineeships, pointing out their excessive costs both in terms of wages and social security contributions, as well as high bureaucratic costs (education agreements in the case of extracurricular university traineeships, registration with the social security when needed, the need for a tutorship, monitoring, evaluation, certification, etc.). The complexity of the legal framework in Spain (labour and non-labour traineeships, for graduated/ungraduated, open/managed by PES, subsidised traineeship costs/posterior hiring) is seen by employers as another obstacle leading to confusion around the rights and obligations of trainees and companies. Finally, as in Bulgaria, the lack of monitoring and evaluation of open market traineeships is also a factor discouraging Spanish employers from offering open market traineeships according to the QFT principles.
2. In **Latvia**, quality open market traineeships are rarely offered due to the lack of state support for employers offering open market traineeships with employers thus preferring subsidised training schemes under ALMP. Open market traineeships in this country require an employment contract and compliance with measures to combat undeclared work, which are regarded by employers as time-consuming and inflexible with respect to recruitment and dismissal procedures. The fact that most Latvian companies are small and have limited human and financial resources further exacerbates these existing difficulties.
3. Also in **Poland**, the QFT is not widely known among relevant stakeholders. SME traineeship providers face the biggest obstacles. Similarly to Spain, among important obstacles, employers point to the high costs of traineeships, such as wages, social security insurance, administrative costs and bureaucracy. Finally, as evidenced in some other Member States (e.g. BG, ES, LU), the lack of monitoring and evaluation of open market traineeships also prevents Polish employers from offering quality traineeships.

Thirdly, minor obstacles to the implementation of open market traineeships were reported in five EU Member States (BE, CZ, LT, LU, RO):

1. In the **Czech Republic**, the low unemployment rate (1.1% in 2014 and only 0.4% in 2020 for people between 15 and 25 years old) is the main reason for employers' preferences to employ people under longer-term contracts rather than trainees through traineeships.
2. In **Lithuania**, open market traineeships are generally rare due to the associated administrative burden as well as the legal framework regulating the traineeships there, which limits the percentage of trainees in a company (max 10% of the workforce) and does not provide a 'legal' possibility to pay trainees.
3. Despite the introduction of a new law implemented in 2020 in **Luxembourg**, which addresses the majority of existing obstacles to traineeships following the QFT criteria, the remaining problem is the weak enforcement of existing regulations. As the companies do not face any sanctions for not complying with the law, the quality of open market traineeships decreases.

4. In **Belgium**, the main obstacle is remuneration, as trainees do not receive a salary but compensation. Due to Belgium's complex institutional structure of coordination of the traineeships and the split of competencies on national and regional levels, effectively monitoring the traineeships' quality is challenging. It caused abuse in the labour market, and some trainees were left without compensation.
5. Finally, in **Romania**, bureaucracy, mainly concerning the evaluation process at the end of the traineeship, was recognised by traineeship providers as one of the key obstacles to quality traineeships. This problem has already been addressed with the latest legislative changes in the country (see Section 4.2.1)

Finally, in two EU Member States (AT, DE), the implementation on the ground of the QFT in open market traineeships encountered no (or very limited) obstacles.

It was not possible to assess the obstacles for open market traineeships in 14 Member States (CY, DK, EE, FI, FR, HU, IE, IT, MT, NL, SI, SK, PT and SE) due to the lack of open market traineeships or their limited popularity among employers. In **Cyprus** for example, the discussion of the need to increase traineeship quality is limited to ALMP traineeships only, whereas in **Malta** the employers have a strong preference to use the already existing platform Jobsplus, which provides a better structure and security than open market traineeships; as a result, open market traineeships are very rare in the country.

ALMP traineeships

Significantly fewer obstacles were identified in the study for the implementation of the QFT principles in traineeships within the context of ALMPs. We set out below the Member States with: (1) No (or very limited) obstacles; (2) minor obstacles; (3) some major obstacles; and (4) several major obstacles. Contrary to the open market traineeships, it is important to note that the majority of EU Member States do not face any reported obstacles while implementing the QFT in ALMP traineeships.

Firstly, three Member States face no (or very limited) obstacles to implementing the QFT in ALMP traineeships (FR, IT, SI). For example:

1. In **Italy**, providers indicated that they do not face obstacles in offering ALMP traineeships although some problems with under-staffing of PES and their limited ability to support SMEs, as well as rather rare monitoring visits to trainees by inspections, may have an impact on traineeship quality.
2. No problems with PES capabilities in implementing the QFT in ALMP traineeships nor other major obstacles were identified in **Slovenia**.

Secondly, **several Member States face only minor obstacles in implementing the QFT principles in ALMP traineeships** (HR, CZ, DK, ES, FI, IE, LT, LU, MT, PL, RO). Among the countries with minor obstacles, weak monitoring of traineeship quality by the responsible authorities is an obstacle shared by a number of countries (ES, FI, LU, PL). In some Member States, SMEs have limited resources to provide adequate supervision and guidance to the trainees without significant support from PES (FI, IE, PL). Other identified challenges include limited understanding of traineeship benefits and risk-aversion among employers (IE, LT, RO), high administrative burden for employers (IE, LT, PL) and economic uncertainty due to the COVID-19 pandemic (IE). Other examples of minor obstacles from specific Member States in this group include the following:

1. In **Romania**, the risk of having to return the received subsidies in the case of negative inspection results deters some employers from participating in traineeship schemes.
2. In **Denmark**, some employers refrain from using ALMP traineeship schemes due to their very short duration (4 weeks).

3. Similarly, in **Lithuania**, legal requirements for employers offering ALMP traineeships (a need to keep a 6-month distance between previous work or graduation from the educational institution and a low level of subsidies) deter employers from engaging in these programmes.
4. In **Malta**, existing obstacles concern the difficulties in retaining trainees after traineeship completion and reluctance of companies to offer traineeships despite the existing tax incentive scheme.
5. In **Poland**, the barriers to quality traineeships include difficulties in matching trainees with employers, gaps between traineeship programmes and the local economy needs, as well as – at times – insufficient cooperation between PES and traineeship providers.
6. In **Croatia**, the recent changes to ALMP traineeships are believed to address the previously existing obstacles as indicated by the trade unions and youth organisations. These included very low financial compensation, no paid social contributions and limited role of supervisors.

Thirdly, **some major obstacles in the implementation of the QFT were encountered in five EU Member States** (BE, BG, CY, EE, LV, SK). These include, in particular, the lack of employers' awareness of the existing traineeship schemes (**EE**), employers' perception of traineeships as short-term measures rather than long-term investment in human resources development (**BE, BG**), economic stagnation due to the COVID-19 pandemic (**BG, EL, SK**), inadequate trainee placement not matching their skills and interests (**CY, EE**), low subsidies to cover traineeship costs (**SK, LV**), bureaucracy and workload (**BE, CY, LV**), "de minimis" rule for state subsidies (**CY**) or weak monitoring mechanisms in place (**BE, CY**). In **Latvia**, ALMP traineeships are available only to people with a low educational level (basic up to secondary VET education level), which impacts on the employers' interest in this scheme. In **Belgium**, according to a youth representative, the most significant obstacle is the lack of political attention to traineeships and the fact that politicians wouldn't dare to amend legislation because they don't want to discourage employers and non-commercial organisations.

Finally, **only one EU Member State (EL) faces many major obstacles in QFT implementation for ALMP type of traineeships**. These concern the working conditions of trainees, recognition of skills acquired during traineeships and employment prospects among trainees. According to the available sources¹⁵, the traineeship offer remains weak, and there is a need to enhance the mechanisms for follow-up with trainees, strengthen the cooperation with companies in the development of curricula, and increase quality control. Moreover, the monitoring and enforcement mechanisms also need to be strengthened. A shift would also be desired in companies' perception of traineeships to encourage employers to regard them as a long-term investment in human capital development.¹⁶

¹⁵ European Commission's evaluation of structural reforms in Greece, 2020.

¹⁶ ALMP traineeships within the scope of the study do not exist or the evidence of obstacles could not be gathered in six EU Member States (AT, DE, HU, NL, PT, SE).

Annex 3: Case studies

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Austria

1. Overview of the target population and the development of traineeships

1.1. Main trends in youth unemployment and school-to-work transition

Austria has a relatively low youth unemployment rate. In February 2022, the youth unemployment rate stood at 9%, the fourth-lowest rate among the EU-27.¹ This is considered to be in part due to the varied VET programmes offered at upper secondary level.²

There is a **varied mix of ALMP measures in place to support the insertion of young people into the labour market**. For young adults, the Austrian PES places a strong focus on education and training as the key to sustainable labour market insertion with its programme 'Training Guarantee until 25' [Ausbildungsgarantie bis 25]. Under this training guarantee, implemented since 2017, the PES offers additional (skills) training options to unemployed young adults (between the ages of 19 and 24) whose highest qualification level is compulsory education.³ The 'Training Guarantee until 25' is a package of successfully implemented qualification measures, such as intensive training for skilled workers, supra-company apprenticeship training or work foundations. According to information provided by the Ministry of Labour, in 2020, a total of around 11,900 people received support through the programme.⁴

In terms of employment rates after graduation, **the school-to-work transition overall appears relatively smooth**, particularly for graduates from VET and higher education pathways, though it is significantly lower for graduates from compulsory education and general upper secondary education. Figure 1 displays, in six-month intervals, how the employment rate among graduates has developed over the first two years after graduation (for the school year 2016/17⁵). While the employment rate of higher education graduates is generally high, it strongly depends on the respective field of study. Employment rates for graduates from engineering, IT, business, and law studies are significantly higher than those for graduates from social sciences and humanities.

¹ https://www.ams.at/content/dam/download/arbeitsmarktdaten/%C3%B6sterreich/berichte-auswertungen/001_uebersicht_aktuell.pdf

² See e.g. Dornmayr & ibw, 2021.

³ The target group are young job seekers who are between 19 and 24 years old and only have no more than a compulsory school leaving certificate. This corresponds to around 45 % of all unemployed in this age group. See

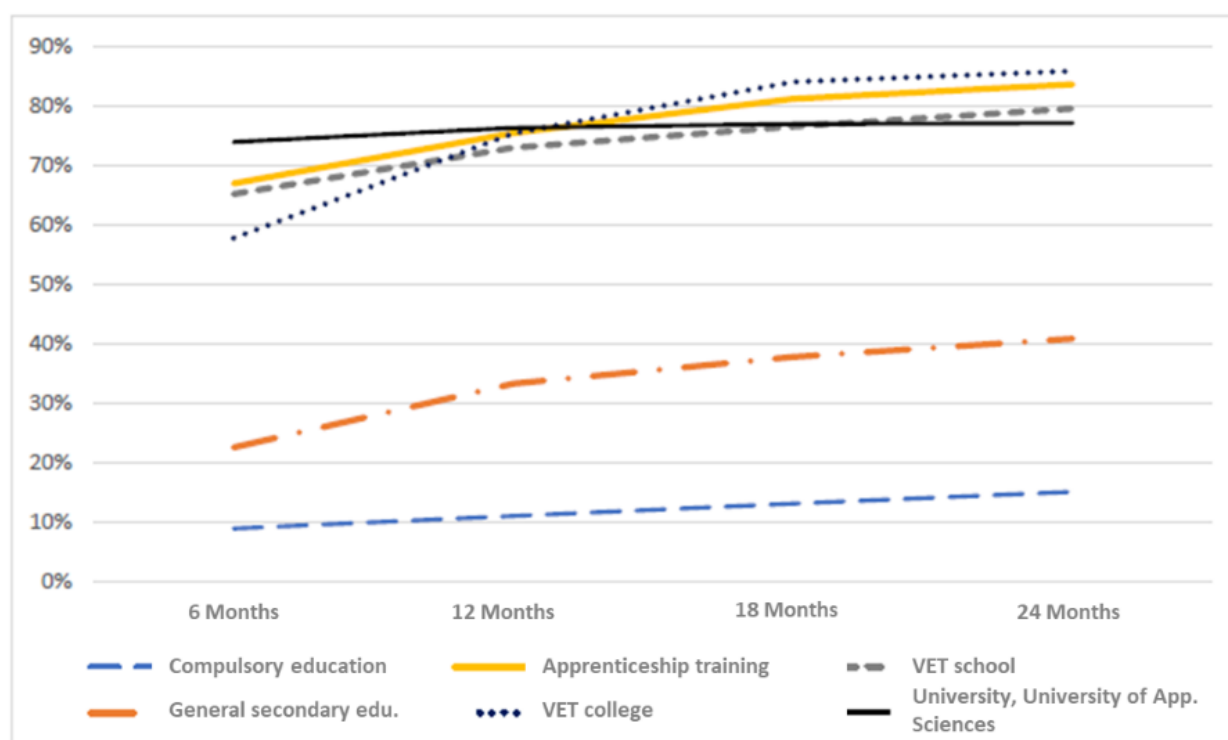
<https://www.bma.gv.at/Themen/Arbeitsmarkt/Arbeitsmarktforderungen/Jugendliche-und-junge-Erwachsene.html>.

⁴ <https://www.bma.gv.at/Themen/Arbeitsmarkt/Arbeitsmarktforderungen/Jugendliche-und-junge-Erwachsene.html>;

https://www.bma.gv.at/dam/jcr:d5b9da48-8d30-4c09-a37c-bb3d9078f29e/Labour%20Market%20Policy%20-%20Overview_Reporting%20Year%202020.pdf

By comparison, in 2019, on an annual average, 13,500 young people aged 18-24 with no more than compulsory schooling were registered as unemployed (about 45% of all unemployed members of this age group).

⁵ Most recent figures available.

Figure 1. Share of employed persons 6 to 24 months after graduation (2016/17), by education level

Source: Adapted (translated) from Forba et al. (2021), p. 45; based on BibER statistics provided by Statistics Austria ('Bildungsbezogenes Erwerbskarrierenmonitoring').

Despite continuous population growth (particularly due to migration flows), **both the share of under 25-year olds and the absolute number of young people are in decline** – a development which will have effects on the labour market, and particularly on the transition of youth into the labour market.⁶ Interviewed stakeholders (representatives from social partners and research organisations) expect that the labour market will develop in favour of young people in the future. It is expected that due to decreasing age cohorts of young people, young people will be able to choose from several paid jobs and will not have to rely on precarious employment, i.e. using traineeships as a means of temporary employment that is poorly paid and offers little protection.

1.2. The prevalence of traineeships in Austria

The prevalence of open market traineeships in Austria is high, although the lack of statistical data does not allow us to present exact figures of open market traineeships as defined by the Council Recommendation on the QFT⁷. A lot of emphasis is placed on gaining work experience during one's education and training pathway. Consequently, young people's first work experience has increasingly shifted to earlier stages of their pathways, i.e. trainees become 'younger' while open market traineeships after graduation are in decline overall (see details below).⁸

Most traineeships in Austria are carried out as mandatory traineeships as part of a formal qualification. This means that a large share of the traineeships taking place in Austria are not covered by the Council Recommendation on the QFT. Traineeships covered by the Council

⁶ Forba et al., 2021.

⁷ Both research reports and stakeholder interviews confirm that traineeships are widespread in Austria, but due to the vagueness of the term in the Austrian context, it is not possible to present exact figures by type of traineeship. In particular, it is not possible to distinguish traineeships covered by the CR of QFT from those not covered by the CR (e.g. because they are part of a formal education and training programme).

⁸ I.e. young people's first work experience is increasingly shifted to earlier stages of pathways - either carried out as voluntary traineeships (not linked to a formal education and training programme) or carried out as compulsory internships within a formal education and training programme. It is not possible to present exact figures on the share of internships that would be covered by the CR on QFT. The Social Student Survey (see IHS, 2019) gives some indication on the prevalence by distinguishing 'compulsory' and 'voluntary' traineeships but focuses on HE students only.

Recommendation play a comparatively smaller role in quantitative terms. As a result, any discourse on traineeships is often ‘overshadowed’ by mandatory traineeships, and open market traineeships in the sense of the Council Recommendation somewhat go unnoticed.⁹

In the Austrian context, **the term ‘traineeship’ (‘Praktikum’) is a very vague term and not specifically defined**, and thus comprises a variety of different activities for young people at various stages of their education and training pathway. A three-week summer work placement by a 14-year old is not comparable with a 6-month traineeship of a university graduate - yet both are summarised under the same term.

Colloquially, terms such as mandatory traineeship, voluntary traineeship or holiday traineeship are used to describe the different types of traineeships common for young people. Relevant surveys such as the Social Student Survey distinguish between **mandatory traineeships** as part of an education or training programme and **voluntary traineeships** (i.e. not included in the curriculum of an education or training programme).¹⁰ Holiday traineeships, though often termed simply as ‘traineeships’, frequently refer to temporary employment during the summer months without a particular training objective and are thus to be treated as temporary employment contracts.

Insights from the Social Survey of Students¹¹, focusing on higher education students, show that **mandatory and voluntary traineeships taking place during education¹² are on the rise, while traineeships conducted after graduation in decline**. As pointed out above, quantitative data tends to focus on mandatory traineeships (i.e. traineeships provided for in the curriculum). When trying to obtain quantitative data on relevant traineeships for this study, focusing on voluntary traineeships (i.e. not provided for in the study curriculum) is the best possible approximation.¹³

Figures from the 2019 Social Survey of Students show that **almost half of the higher education students surveyed (46%) had completed at least one traineeship** (mandatory and/or voluntary) during their studies. This share is higher for female students than for their male counterparts, as the former tend to take up studies in disciplines that more often require the completion of mandatory traineeships (e.g. in health and social care). Looking at the take-up of traineeships carried out after education and training, figures show a slight increase across education levels, except for higher education graduates. Traineeships among higher education graduates have decreased from 16% in 2009 to 12% in 2016.

Overall, **the completion of voluntary traineeships among higher education students depends on their social background** – the higher it is, the more likely they are to complete a voluntary traineeship (remunerated or not). It is likely that students from higher social backgrounds are more likely to be able to ‘afford’ a voluntary traineeship¹⁴ and are less often required to take up (part-time) student employment to cover their cost of living. Figure 2 below shows that **the share of voluntary traineeships that were remunerated (rather than non-remunerated) increased between 2011 and 2019**, while mandatory traineeships, by contrast, displayed an opposing trend. Whether voluntary traineeships are remunerated or not, significantly depends on two variables: sector and gender. Voluntary traineeships were remunerated for 77% of male higher education students

⁹ This information is based on the in-depth interviews carried out as part of the case study. Due to lack of data, it is not possible to provide specific quantitative information on the prevalence of OMT and ALMP traineeships in Austria. Data from the Social Student Survey provides some information on the prevalence of traineeships by distinguishing ‘compulsory’ and ‘voluntary’ traineeships (see further below), however the data only focuses on the experience of students in Higher Education.

¹⁰ The Social Student Survey distinguishes mandatory traineeships and voluntary traineeships. Mandatory traineeships are provided for in the study curriculum and may take the form of a company internship, school internship or a medical clerkship. Voluntary traineeships are traineeships not provided for in the study curriculum. The full questionnaire is available at http://ww2.sozialerhebung.at/images/Berichte/SOLA19_Fragebogen_publ.pdf. Results

¹¹ The Social Survey of Students is the most relevant source of data on the topic of student traineeships. The most recent data is from the 2019 edition of the survey. The survey was carried out by the IHS Institute for Advanced Studies Vienna, on behalf of the Ministry of Education, Science and Research. <http://ww2.sozialerhebung.at/>

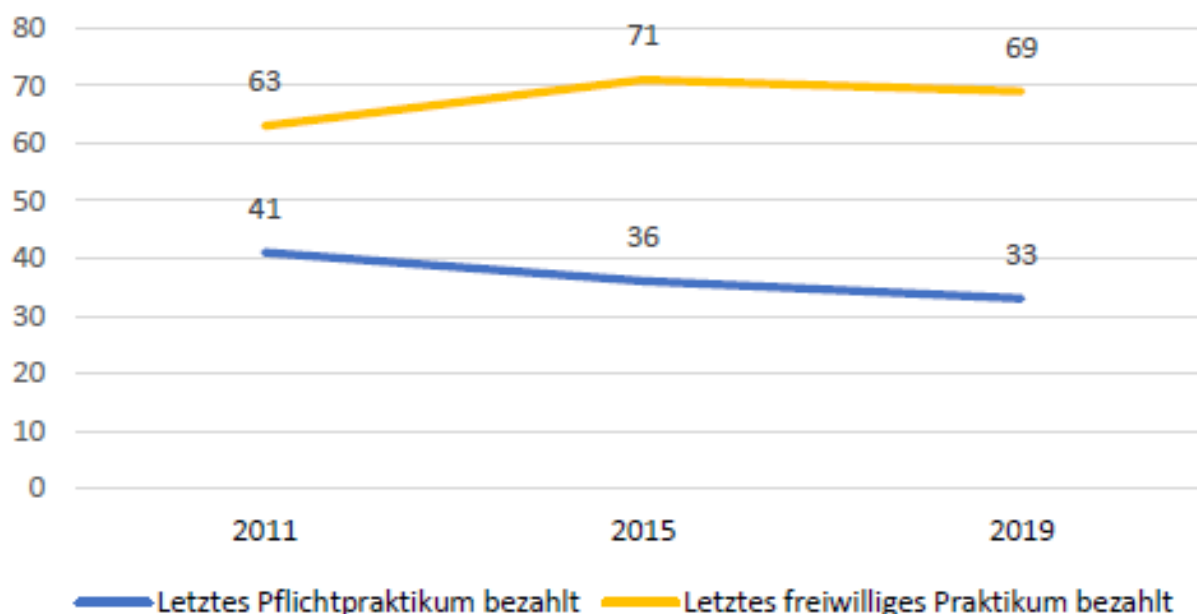
¹² Traineeships overall does not mean that they are necessarily part of an education or training programme (but may be). For instance, voluntary traineeships that are carried out by students and are not provided for in the curriculum are within the scope of OMT according to the definition used in the project. The latter is based on the 2012 Staff Working Document <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2012:0407:FIN:EN:PDF> and the on European Commission (2016), Applying the Quality Framework for Traineeships, SWD (2016) 324 Final, Strasbourg.

¹³ According to data from the Social Student Survey, 16 % of the HE students who completed a voluntary traineeship were able to have this credited to their studies.

¹⁴ Among HE students whose parents have only completed compulsory education (or less), 18 % have completed a voluntary traineeship - compared to 30% of students who have completed a PhD (Forba et al. 2021).

(compared to 62% of female students). Differences are even more pronounced at sector level: in IT, 90% of voluntary traineeships are remunerated, compared to 30% in fields related to health and social care. A very similar disparity can be observed for the social security status of trainees.¹⁵:

Figure 2. Share of remunerated voluntary and mandatory traineeships among higher education students



Source: Forba et al. (2021), p. 9; based on Social Survey of Students 2019. Blue line: 'latest mandatory traineeship was remunerated'; yellow line: 'latest voluntary traineeship was remunerated'.

Overall, the following trends can be observed with regard to traineeships since 2014:¹⁶

- The overall number of traineeships is on the rise - it is increasingly 'normalised' for traineeships to be part of an individual's career entry. Traineeships have thereby **shifted forward in terms of age**, i.e. young people undertake traineeships at a younger age than previously¹⁷.
- Traineeships are **increasingly being integrated into education and training programmes**, which leads to a reduced significance of traineeships covered by the Council Recommendation on the QFT.
- **Traineeships conducted after the completion of education (graduate traineeships) are in decline and have an increasingly negative connotation.** 'If you are turning 29 and still doing a traineeship with an NGO, it's not considered as a plus point in your CV (unless it's with a really prestigious employer like the Central Bank)'. Only 13% of higher education graduates embark on a traineeship after graduation – approximately 30% of whom are unpaid.
- Women are more likely to take up a traineeship than men (49% vs. 42% with traineeship experience).
- Non-mandatory traineeships are generally carried out by youth from more educated backgrounds.

¹⁵ 49% of the voluntary traineeships carried out by female students had social security coverage (compared to 67 among male students). This disparity cannot be explained through different study choice alone. See Forba et al., 2021.

¹⁶ Interviews, Forba et al. 2021, WKO 2021.

¹⁷ This means that traineeships are increasingly being carried out by students who are still in education and training rather than by graduates. While an important share of these traineeships will be carried out as part of formal education pathways (and thus are not covered by the CR on QFT), there are also significant numbers of voluntary traineeships carried out by students that fall under the coverage of the Council Recommendation.

In Austria, ALMP traineeships refer mostly to short-term work trainings offered as a (re-) insertion measure by the PES. There are two different types of work trainings offered that would fit the definition of an ALMP traineeship according to the QFT, the 'Arbeitserprobung' [work trial] and the 'Arbeitstraining' [work training], which are quite similar and only differ with regard to specific characteristics.¹⁸ No information on the prevalence of ALMP traineeships could be obtained (PES declined to be interviewed and data is not publically available). However, many of them are linked to formal education and training pathways and thus are considered outside the scope of the Council Recommendation.

- With a **work trial**, the objective is to check whether a candidate is personally and professionally suitable for a given job. The ultimate goal is a permanent employment position. The maximum duration is 28 days. Trainees are entitled to an allowance from the PES.
- With a **work training**, the objective is for a trainee to gain professional experience and increase their chances in the labour market. A work training is not directly geared to a specific job offer. The duration is between 1 and 12 weeks. Trainees are entitled to an allowance from the PES.¹⁹

2. National and regional legislation and policies relevant to quality traineeships

2.1 Key national legislative and policy framework

The term 'traineeship' is not defined under Austrian labour law. According to case law, it is the key characteristics of the specific traineeship that determine its status and treatment under social and labour law, and whether it will be treated as an employment relationship or as a training relationship. Unregulated and unpaid traineeships are technically allowed in Austria— if training is their key purpose and under specific conditions only. In practice, **this creates a significant grey area in legislative terms.**

- **Employment relationship:** If employee characteristics such as criteria of personal dependency, work obligation with operational integration in relation to working hours, etc. predominate, or if the traineeship corresponds to a holiday replacement, it is a (fixed-term) employment relationship. If a traineeship is considered an employment relationship, then **employment legislation applies fully**, as for regular employees. This includes regulations with regard to working conditions, working time, holiday entitlements and sick leave (as stipulated, e.g., in the e.g. ASchG, AZG, UrlaubsG and the ARG Act). Collective bargaining agreements may provide additional arrangements.
- **Training relationship:** If the purpose of the traineeships is predominantly the training aspect, there is no insurance obligation and no protection under labour law, with the exception of accident insurance. Training relationships are not regulated by law. In the case of a training relationship, the trainee has no obligation to work, and is not committed to perform a certain number of working hours. If they did, the traineeship could no longer be classified as solely for training purposes, but would need to be considered as an employment relationship. Training relationships do not necessarily need to have a formal connection to an education or training programme and thus may be within the scope of the Council Recommendation on QFT.²⁰

The decision on the contractual form of the specific traineeship has to be made for each case separately. According to Austrian case law, in principle, an employment relationship must be

¹⁸ For further information on these measures, see AMS (2022). No information on the prevalence of ALMP traineeships could be obtained.

¹⁹ AMS 2022b.

²⁰ See Forba et al., 2021.

assumed as soon as the traineeship displays characteristics of an employment relationship. **In practice, however, the distinction between employment and training relationship is often not straightforward.**²¹ Unpaid traineeships can be legal when the characteristics of a training relationship predominate. Problems arise when there is neither adequate payment nor social security coverage but the traineeship nevertheless *de facto* resembles an employment relationship. **This creates a significant grey area without a regulatory background.**

2.2 Traineeships in collective bargaining agreements

Below legislative level, however, the anchoring of provisions for traineeships in collective bargaining agreements has advanced throughout the past decade, in particular in sectors related to industry and crafts. These **provisions have helped to reduce the uncertainty among employers related to the employment status of trainees.** An example is provided in the box below:

Collective bargaining agreement for the IT industry

This agreement contains a separate section (as part of Article 15) on minimum pay for different types of traineeships. It thereby distinguishes between mandatory traineeships, voluntary student traineeships (that are not anchored in a curriculum) and student summer (school holiday) jobs. For voluntary student traineeships, this agreement additionally sets a maximum duration (18 months with the same employer, i.e. not in line with the principles of the QFT) and the requirement of a training plan.²²

Interviewed stakeholders reported **observed improvements for trainees in some sectors** (e.g. tourism, trade, industry), in terms of remuneration, thanks to the traineeship provisions made in collective bargaining agreements. In technical domains, traineeships are almost always remunerated, while in chronically underpaid sectors such as health and care, unpaid traineeships are still commonplace. Likewise, unpaid traineeships are still commonplace in the fields of culture and media. At the same time, these are often female-dominated sectors, while male-dominated sectors such as technology and IT almost always offer paid traineeships.

While traineeships in nursing and healthcare are often unpaid, they tend to be of good quality, in that they display a clear focus on the training and learning component and are accompanied by competent supervision.²³ In media and arts, however, there are reportedly still too many traineeships that are both unpaid and of poor quality²⁴. It is hoped that in the medium term, with decreasing cohorts of young people, they will find it increasingly easy to find a placement, in particular in the context of skilled labour shortage.

3. Stakeholder views on traineeships

***'In the case of Austria, so many different things are labelled as a 'traineeship' in everyday language. One would probably need to define at least six types and set standards for each.'* (Stakeholder)**

All interviewed stakeholders consider traineeships as a **useful and important instrument for young people to gain first work experience, and to facilitate their transition to the labour market.** In terms of public discourse, the topic of traineeships was in the media spotlight in the first half of the 2010s, often under the banner of **'Generation Praktikum'** [Traineeship Generation]. Since then, the topic has not received much attention. The actual issue – precarious or unfavourable

²¹ See Forba et al. 2021.

²² Sample agreement for employees in the IT industry (in force since 01.01.2022): <https://www.wko.at/service/kollektivvertrag/kv-informationstechnologie-2022.pdf>.

²³ Study results (see Forba et al. 2021) indicate the following key determining factors related to 'good' traineeships: training/learning content, inclusion into the team, competent supervision, appreciation of one's work, social climate.

²⁴ E.g. in the sense that the traineeships offer insufficient learning experiences, are not accompanied by competent supervision and/or are unprofessionally organised.

employment of young people before or at their transition to the labour market - still exists, however, stakeholders perceive that there is less public concern about it.

Employee organisations (Chambers of Labour, Labour Unions) have repeatedly demanded better social and economic protection for traineeships over the years. There were even discussions on the possible introduction of a traineeship law, which were however discarded, as it was ultimately not deemed necessary to introduce additional legislation.

It is acknowledged that traineeships are still sometimes completed under precarious or unfavourable conditions (little or no pay; no social security coverage) while the work carried out within the organisation would clearly point to an employment relationship. There are however **fears among some stakeholder groups – particularly employer organisations – that the traineeship offer would plummet if this type of traineeship were more heavily regulated**, and that in particular small and medium-sized companies would stop offering traineeships as a result.

Overall, legislators and the policy level do not seem very interested in the topic of traineeships right now. They mostly accept the situation as it is. As one stakeholder put it: *‘Those who have reason to be concerned with traineeships are dealing with the issue anyway, e.g. at the level of schools or universities.’* (own translation)

4. Actions taken in response to the QFT

The key legislative and policy framework has remained relatively unchanged in the period 2014-20. The existing legislation (i.e. the body of laws and regulations that apply to employment relationships) was considered sufficient to provide the required legislative framework to ensure the quality of traineeships. As a result, **the Council Recommendation on the QFT did not lead to any immediate legislative changes in Austria**. The only two developments during the evaluation period are the increased anchoring of traineeship provisions in collective bargaining agreements (see above) and the legal prohibition of unpaid traineeships in place in the public sector. Adopted in 2014, the VBG Act, the Contractual Public Employees Act provides for the social protection of trainees in the public sector (health, accident, pension and unemployment insurance) and specifies that trainees must be remunerated according to a legally defined remuneration scheme (depending on the trainee’s education level and duration of the traineeship).

Although implemented during the period of study, none of the interviewed stakeholders linked these two developments to the Council Recommendation on QFT.

Guidelines on quality traineeships

The Ministry of Labour, the Chambers of Labour, the Economic Chambers and the Austrian Health Insurance Fund regularly publish **traineeship guidelines** to inform trainees, their parents and/or companies about their rights and obligations.²⁵ While these mostly focus on mandatory traineeships, they generally include information on other types as well. The Austrian Youth Portal provides 'traineeship checklists' as guidance documents for companies, schools, parents and youth.²⁶ There are four different checklists, one each for addressing companies, parents, youth (trainees) and schools – while the latter only applies to mandatory traineeships (provided for in an education or training programme), the other three checklists address various types of traineeships. They provide general information on the different types of traineeships and the rights and duties

²⁵ Brochure published by the Federal Ministry of Labour, Social Affairs and Consumer Protection:

<https://broschuerenservice.sozialministerium.at/Home/Download?publicationId=40>;

Brochure published by the Austrian Health Insurance Fund:

<https://www.gesundheitskasse.at/cdscontent/load?contentid=10008.683493&version=1649921459>;

Brochure published by the Economic Chambers (focus on mandatory traineeships): <https://www.wko.at/service/arbeitsrecht-sozialrecht/pflichtpraktikanten.pdf>;

Brochure published by the Vienna Chamber of Labour (focus on mandatory traineeships):

https://wien.arbeiterkammer.at/service/broschueren/Bildung/FAQ_Pflichtpraktikum.pdf

²⁶ <https://www.jugendportal.at/themen-infos/arbeit-beruf/praktikum/checklisten-praktikum>

There are four different checklists, e.g. for companies

https://www.jugendportal.at/sites/default/files/uploads/checkliste2022_unternehmenweb.pdf

they entail. This is followed by a checklist with useful recommendations for the preparation, implementation of and follow-up to traineeships. Many of these recommendations are in line with the QFT principles, including: traineeship based on a written agreement; written agreements indicate training objectives, duration, working conditions; traineeship providers assign a supervisor role for the trainee; compliance with working conditions under applicable law; health insurance coverage (in case of employment relationship); feedback interview and traineeship certificate.

5. Key evaluation findings

5.1 Effectiveness

As mentioned above, as the legal framework in place prior to the adoption of the Council Recommendation on a QFT was considered sufficient to ensure quality traineeships, the QFT has not led to any implementation measures at national level. Some challenges remain, including the fact that the term 'traineeship' is not defined in national labour legislation and that unregulated traineeships are technically allowed – if training is their key purpose and under specific conditions only. These traineeships do not implement the principles of the QFT: there is no protection under labour law, with the exception of accident insurance. However, as soon as a trainee is integrated into the working life and into the company organisation, a (fixed-term) employment relationship must be assumed - in reality, this applies for the majority of traineeships carried out. In this case, employment legislation applies fully, and covers some of the QFT principles, including arrangements for working conditions, working time, holiday entitlements and sick leave. The indication of educational objectives, the provision of traineeship supervisor; the limited duration; and assessment and certification are not covered however.

Nonetheless, arrangements set out in collective agreements (see above) are reported to have had an impact for those sectors where this has been the case.

Stakeholders consulted during the study outlined that the reason there were no direct responses to implement the QFT in national legislation is that the legislative framework was considered sufficient to provide for the quality of traineeships - especially because a very large number of traineeships are to be considered as employment relationships and thus need to comply with relevant employment legislations. Nonetheless, problems in ensuring the implementation of quality traineeship on the ground remain.

Whether traineeships adhere to certain quality standards or not very much depends on the sector and size of the company. Large companies reportedly place a lot of value on providing good-quality traineeships, also as a means of recruitment, which contrasts to SMEs that do not have the resources to do so in the same way. There are also some sectors which are more prone to precarious traineeships than others: media, social care, healthcare, arts.

The complex regulation defining the distinction between the different types of traineeships was considered a hindrance to ensuring quality traineeships on the ground. The majority of interviewed stakeholders²⁷ called for a clearer distinction of the different types of traineeships (especially with regard to whether they constitute a training or employment relationship), as this would help to better implement and monitor existing legislation, and contribute to a more consistent approach to ensuring the quality of different types of traineeships.

5.2 Efficiency

Given that the QFT has not led to any directly attributable implementation measures, no data on benefits or costs of implementing the QFT is available. Nevertheless, findings show that quality traineeships are considered as a promising opportunity for young people to gain professional

²⁷ In particular, addressed by interviewed stakeholders representing the youth sector, employees and by the interviewed researcher.

experience - and for employers as a means to recruit staff. These mutual benefits on both sides were repeatedly emphasised by various interviewed stakeholder groups.

In particular, the research and consultations carried out for this case study highlighted that the **key benefits of quality traineeships for young people** is the opportunity to gain professional/work experience and to get to know different fields of work. Trainees in Austria overall tend to assess their traineeships positively. The factors that contribute most to a positive assessment are recognition within the team/company, the quality of the learning content, and the supervision and guidance provided during the traineeship.²⁸ This is further confirmed by research which found that voluntary traineeships (i.e. not required by the curriculum) carried out by higher education students had positive effects on their income, job readiness and satisfaction.²⁹

In terms of **obstacles preventing employers from offering quality traineeships**, it is worth mentioning that none of the interviewed stakeholders pointed to any major obstacles preventing employers from offering quality traineeships, with the exception of lack of clear distinction between the different traineeships (as outlined above). In fact, at the moment, employers are fighting to find trainees, given the lack of qualified staff which has been intensified partly by the pandemic.

Large companies find it generally easier to offer traineeships - especially if they have a person appointed to be in charge of a trainee. The size of the company and the area in which it operates are therefore important factors determining whether it is easy or not to provide traineeships - but there are no perceived obstacles as such. For several years now, companies seem to increasingly and proactively use traineeships as a means to recruit staff and to retain trainees.

5.3 Coherence

The interviewed social partner representatives explicitly indicated that overall ambition and purpose of the QFT are considered to be coherent with social, educational, employment and training policies in Austria, while the other interviewed stakeholders also at least implied a certain level of coherence.

One of the interviewed social partner representatives specified this further, indicating that from an education policy perspective, the objective is that work experience is embedded into education and training pathways. Traineeships should be well prepared, followed up on, and supervised, to ensure the learning experience. A positive traineeship experience can lead to personal growth among trainees. From an industry point of view, good quality traineeships are important too - they are a means for companies to recruit skilled workers and position themselves as an attractive employer. From a social policy perspective, trainees should be covered by social security - this is however linked to the traineeship being considered as an employment relationship (and does not apply to traineeships considered as training relationships).

Several interviewed stakeholders³⁰ pointed out that from an Austrian perspective, there would be need to distinguish and define different types of traineeships. This would help bring clarity to the legislative framework and ensure coherence with other policies and legislation.

5.4 EU added value

All interviewed stakeholders expressed their belief that the QFT has provided added value at European level, especially for countries that do not have a sufficient legislative framework in place. The existence of a European-level document was also seen as valuable in **providing leverage to the arguments of national stakeholders** on ensuring quality traineeships. The existence of a European framework is also considered of relevance for young Austrians who embark on a traineeship abroad.

²⁸ Based on information note provided by the Chamber of Labour of Vienna, based on findings from the survey carried out by FORBA et al. (2021). Note that the study covered a broad array of traineeships with a strong focus on mandatory traineeships (which are outside the scope of the QFT). However, we assume that the perceived benefits for trainees will be comparable.

²⁹ Bittmann, Felix/Zorn, Viktoria (2019). When choice excels obligation: about the effects of mandatory and voluntary internships on labour market outcomes for university graduates, in: Higher Education, 80: 75–93

³⁰ Representatives from Chamber of Labour; research institution; youth association.

One interviewed stakeholder described the EU added value as follows: 'It is an important signal towards European youth that they are worth something. The QFT has lifted an area into the spotlight where issues and problems persist in many European countries. It is important that youth is being taken care of - European youth are mobile and European-minded, that's why it is important to have the QFT as a tool at European level.' (own translation).

5.5 Relevance

The relevance of the QFT for the Austrian context can be best described with a stakeholder quote **'little relevance – but it's a good thing that it exists'** (own translation).

The relevance of the QFT principles for the Austrian context has been low and very limited. At least for those traineeships considered as employment relationships, the existing legislative framework is dense and considered to go beyond the requirements of the QFT principles. Nevertheless, interviewed stakeholders emphasised that **they consider it very important that the QFT exists**, even if it has not led to any concrete implementation measures at Austrian national level.

In terms of additional dimensions that could be included to increase the relevance of the QFT, Austrian stakeholders made the following suggestions:

- 'In the case of Austria, so many different things are labelled as a 'traineeship' in everyday language. If the QFT could help define a number of different types of traineeships and set standards for each, then this could really help bring clarity to the situation in Austria.'³¹
- 'The implementation of the QFT could be accompanied by a voluntary peer review process for countries - this could be valuable for Austria too. Or, alternatively, a monitoring process, where countries regularly report on their implementation progress.'³²
- 'If continued, the QFT should be amended so as to demand for traineeships to be paid/remunerated.'³³
- 'Exchange between countries therefore makes sense in any case, at least when it comes to mobility, also in the case of internationally advertised traineeships.'³⁴
- 'The more concrete the recommendations are and the more insistently they call for improvements, the more sense they make. The (often precarious) working life reality of young people in a number of European countries must be made clear.'³⁵
- 'Especially for young trainees, their parents perform an important role in identifying and arranging placements - the creation of traineeship exchanges/platforms at national or regional level would help a lot.'³⁶

³¹ Statement by interviewed researcher.

³² Statement by interviewed youth sector representative.

³³ Statement by interviewed youth sector representative.

³⁴ Statement by interviewed social partner representative.

³⁵ Statement by interviewed social partner representative.

³⁶ Statement by interviewed social partner representative.

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- Jugendportal (nd). Checklisten Praktikum [Traineeship checklists]. <https://www.jugendportal.at/themen-infos/arbeitsberuf/praktikum/checklisten-praktikum>
- AMS (2022b). Beihilfe für Arbeitserprobung oder Arbeitstraining. [Allowance for work trial and work training] (Web resource) <https://www.ams.at/arbeitsuchende/aus-und-weiterbildung/so-foerdern-wir-ihre-aus-und-weiterbildung-beihilfe-fuer-arbeitserprobung-oder-arbeitstraining>

Relevant legislative acts

- Allgemeines Sozialversicherungsgesetz (ASVG) [General Social Security Act]. www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008147 (date of access: 29.04.2022)
- Arbeitsvertragsrechts-Anpassungsgesetz (AVRAG) [Employment Contract Law Harmonization Act]. <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008872> (date of access: 29.04.2022)
- Arbeitsverfassungsgesetz (ArbVG) [Federal Act on the Labour Constitution]. <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008329> (date of access: 29.04.2022)
- ArbeitnehmerInnenschutzgesetz (ASchG) [Worker Protection Act]. <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008910> (date of access: 29.04.2022)
- Angestelltengesetz (AngG) [Federal Act concerning the employment contracts]. <https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008069> (date of access: 29.04.2022)

- Entgeltfortzahlungsgesetz (EFZG) [Federal Act concerning the payment of wages for ill employees].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008308> (date of access: 29.04.2022)
- Ausländerbeschäftigungsgesetz (AuslBG) [Employment of Foreigners Act].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008365> (date of access: 29.04.2022)
- Arbeitszeitgesetz (AZG) [Federal Act on the Organisation of Working Time].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008238> (date of access: 29.04.2022)
- Arbeitsruhegesetz (ARG) [Federal Act governing weekly rest periods and rest from work on public holidays].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008541> (date of access: 29.04.2022)
- Kinder- und Jugendlichen-Beschäftigungsgesetz 1987 (KJBG) [Federal Act concerning the employment of children and young persons].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008632> (date of access: 29.04.2022)
- Lohn- und Sozialdumping-Bekämpfungsgesetz (LSD-GB) [Act to combat wage dumping and social dumping].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20009555> (date of access: 29.04.2022)
- Urlaubsgesetz (UrlaubsG) [Federal Act on holidays].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008376> (date of access: 29.04.2022)
- Vertragsbedienstetengesetz (VBG) [Contractual Public Employees Act].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10008115> (date of access: 29.04.2022)
- Gleichbehandlungsgesetz (B-GBG) [Federal Equal Treatment Act].
<https://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=20003395> (date of access: 29.04.2022)

Collective bargaining agreements:

Can be downloaded from this website: <https://www.wko.at/service/kollektivvertraege.html>

Sample agreement for employees in the chemical industry (in force since 01.05.2021):

<https://www.wko.at/service/kollektivvertrag/kollektivvertrag-chemischen-industrie-angestellte-2021.html> (date of access 29.04.2022). The agreement contains a separate section (Article 18a) on trainees. This particular agreement distinguishes between compulsory traineeships and voluntary (school holiday) traineeships and defines their minimum pay.

Sample agreement for employees in the IT industry (in force since 01.01.2022):

<https://www.wko.at/service/kollektivvertrag/kv-informationstechnologie-2022.pdf> (date of access 29.04.2022). The agreement contains a separate section (as part of Article 15) on minimum pay for different types of traineeships. It thereby distinguishes between mandatory traineeships, voluntary student traineeships (that are not anchored in a curriculum) and student summer (school holiday) jobs.

List of interviewed stakeholders

- Federal Ministry of Labour, Department for Employment Legislation
Austrian Economic Chamber (Wirtschaftskammer Österreich, WKO), Department for Social Policy and Health
- Austrian Youth Council (Bundesjugendvertretung, BJV), Management Board
- Forba Working Life Research Centre, Researcher
- Chamber of Labour of Vienna (Arbeiterkammer Wien), Department for Apprenticeship Training and Education Policy

Focus group

It was not possible to organise a focus group discussion for Austria – due to issues of data protection, it was not possible to obtain contact details of former trainees. The authors were however able to interview the key researcher of the most relevant piece of research available on the life realities of young trainees in Austria – which was also based on qualitative research (see Forba 2021).

Bulgaria

1. Overview of the target population and the development of traineeships

1.1. Main trends in youth unemployment and the school-to-work transition

There has been a decline in the youth population in Bulgaria over the last few decades due to a combination of factors such as demography and migration. The ratio of young people (15-29 years) in the total population decreased by nearly 20% from 1.204,894 in 2014 to 965.916 in 2021.³⁷

This may in part explain the **overall decline in trainee supply**, which in the national context includes mostly students in tertiary education programmes and, to a much lower extent, upper secondary education graduates.³⁸ Enrolments in tertiary education decreased by 9% between the 2016/17 and 2021/22 academic years e.g. from 243.199 to 220.439³⁹ and for certain sectors (e.g. energy power) student places could not be filled.⁴⁰ The overall number of upper secondary graduates (general education and VET) fell by 6.5% from 48.281 (2017) to 45.133 (2020).⁴¹

For the period 2014-2020, the youth unemployment rate in the country reduced significantly though - from 18% to 9%⁴² and there was also a decrease in the NEETs rate - from 24% to 18%. Nevertheless, these rates remain higher than the EU-27 average of 14% in 2020.⁴³ Furthermore, the 2019 Employment Performance Monitor identified "high and/or increasing incidence of youth unemployment and/or NEETs" as a "key employment challenge" in Bulgaria.⁴⁴

1.2 The prevalence of traineeships in Bulgaria

Open market and ALMP traineeships were not very popular in Bulgaria before 2014. While, according to the 2013 Flash Eurobarometer, 36% out of the 501 Bulgarian participants had a traineeship experience, most of these had taken place during their studies (without it being a mandatory part of their studies).⁴⁵

Due to an amendment of the Labour Code (LC) in 2014 (see section 1.2) which implemented most of the QFT principles in relation to open market traineeships, **open market traineeships have become more popular in recent years**. The figure below shows an increase in the number of registered traineeship contracts in the years (2015, 2016) immediately following the Labour Code amendment, peaking in 2016 with over 2.000 concluded traineeship contracts.⁴⁶ A decline is observed between 2017 and 2019 which became even more pronounced in 2020 and 2021. The decline is attributed partly (but not only) to the negative effects of the pandemic⁴⁷ which exacerbated structural labour market problems.

³⁷ National Statistical Institute, https://www.nsi.bg/sites/default/files/files/data/timeseries/Pop_6.1.2_Pop_DR_EN.xls.

³⁸ Based on employer and a trade union representative interviews.

³⁹ National Statistical Institute, https://www.nsi.bg/sites/default/files/files/data/timeseries/Edu_3.1.1_en.xls

⁴⁰ Based on employer representative interview.

⁴¹ National Statistical Institute, https://www.nsi.bg/sites/default/files/files/data/timeseries/Edu_2.8.9_en.xls. In relation to this trend it should be mentioned that the popularity of VET gymnasiums in general also declined despite efforts to increase the involvement of employers e.g. through the launch of the Domino project (2015-2020) that piloted apprenticeships in the country.

⁴² Eurostat (YTH_EMPL_090). Data for 2021 is not considered since there is a break in time series.

⁴³ Eurostat (EDAT_LFSE_20).

⁴⁴ COMMISSION STAFF WORKING DOCUMENT (COM(2020) 277 final), p.29.

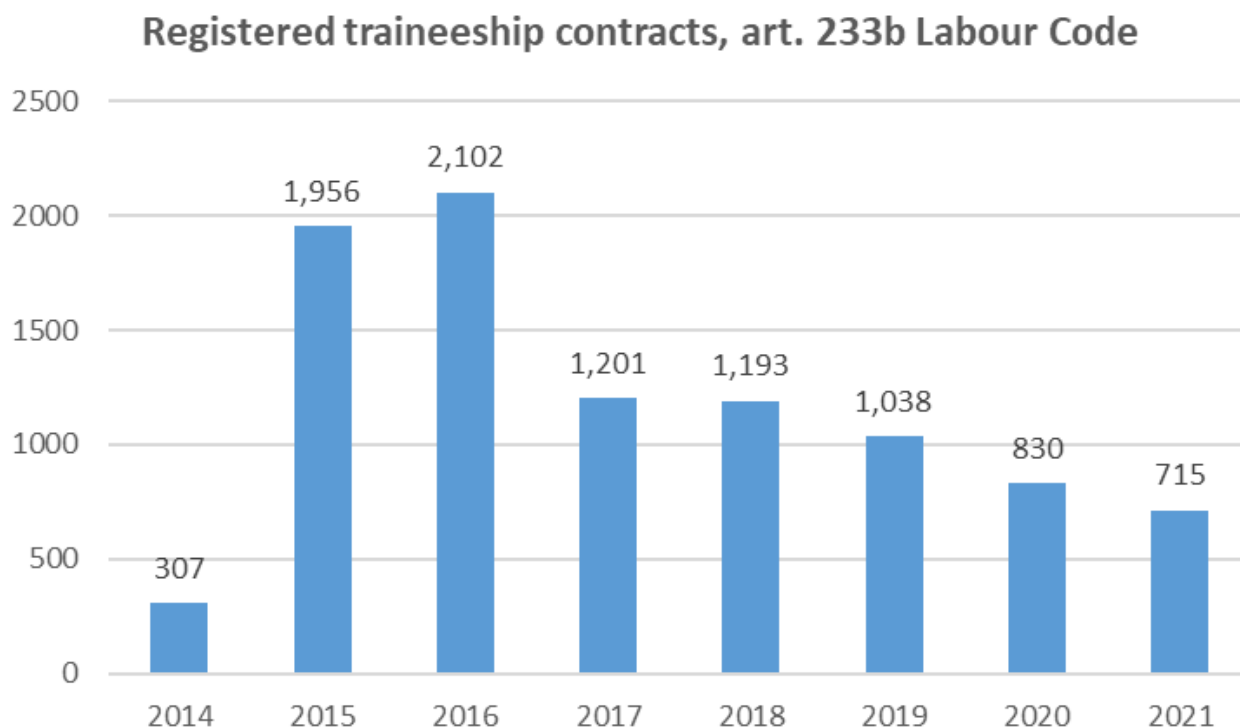
⁴⁵ Flash Eurobarometer 378: The experience of traineeships in the EU. Participants in the survey aged between 18 and 35.

⁴⁶ The number of traineeship contracts for 2014 is considerably lower as it refers to 25.03.2014 - 31.12.2014 since the LC amendment entered into force from 25.03.2014 on.

⁴⁷ Based on PES stakeholder interview.

In terms of the prevalence by sector of traineeships, it is worth noting that only 18% of traineeship providers are large companies. This suggests that micro and small and medium enterprises (SMEs) have an important role to play as traineeship providers in Bulgaria – an argument supported also by findings from the focus group conducted for this study. There is evidence that this pattern emerged before 2014 since most Bulgarian trainees (66%) that took part in the 2013 Flash Eurobarometer also indicated that they gained their experience within SMEs.

Figure 3. Number of open market traineeship contracts, 2014-2021.



Source: National Revenue Agency. Information provided upon personal request.

ALMP traineeships in Bulgaria relate to specific programmes or ALMP measures regulated in law (see section 2). The most recent data available covers the period 2015-2017 and shows that the number of participants in the 'Career Start programme' - the most popular traineeship programme implemented by the PES - increased by 8%, benefiting 884 young people in 2017.⁴⁸ Despite this positive development the number comparatively was very low, representing less than 1% of the overall number of young people aged 15-29 (1.083,467) in 2017.⁴⁹ Of note is that the number of trainees involved in ALMP traineeships subsidised under the Employment Promotion Act was considerably lower e.g. 17 trainees for 2017 and 45 trainees for 2015.⁵⁰

2. National and regional legislation and policies relevant to quality traineeships

The key national legislative framework governing **open market traineeships** is the Labour Code. An amendment of the Labour Code in 2014 introduced the traineeship contract and also implemented most of the QFT principles into national legislation. In more detail:

- Art. 233 (3) of the LC regulates the conclusion of a written traineeship agreement between the employer and the trainee. The contract shall specify: the nature of the work, date of its

⁴⁸ Ministry of Labour 2017, 2019

⁴⁹ National Statistical Institute, https://www.nsi.bg/sites/default/files/files/data/timeseries/Pop_6.1.2_Pop_DR_EN.xls

⁵⁰ Ministry of Labour 2017, 2019

beginning and conclusion, paid annual leave in days, conditions for termination of the employment contract; remuneration, duration of the working day or week, manner and form of acquiring the practical skills [Art 233b, (2) and (3)].

- According to Art. 233b, LC:
 - trainees must be up to 29 years old, with secondary or higher education, without work experience and without any professional experience on the graduated profession or specialty.
 - The amount of the remuneration shall be determined at the discretion of the employer but shall not be lower than the minimum wage in the country (approx. EUR 350 per month for 2022).
- Of note is that the definition of trainees in the LC is somewhat narrow in terms of educational level, for instance, young people that due to one or another reason could not complete their upper secondary education (early school leavers, NEETs) are not covered and thus cannot conclude a traineeship contract. Data on this group of trainees is not available.

ALMP traineeships are regulated in the Employment Promotion Act (EPA) as an ALMP measure that also provides financial subsidies to employers. Art. 41 stipulates that for each job created for a traineeship, filled by an unemployed person under 29 years of age⁵¹ who is hired upon referral by the PES, the employer can receive subsidies for up to nine months. The subsidies cover remuneration for actual time worked, social and health insurance of the trainee, etc. In addition to EPA, other ALMP traineeship measures are defined within the framework of specific programmes (often co-funded by ESF), for instance, the 'Career Start programme'. This programme provides traineeships in the public administration and is aimed at young people up to 29 years with higher education qualification and without work experience who are registered at the PES (Ministry of Labour 2017, 2019). The programme is funded by the state budget under the Human Resources Development Operational Programme (HRD OP) and is included in the National Employment Action Plans (NEAP), updated each year by the Ministry of Labour and Social Policy.⁵²

3. Stakeholder views on traineeships

The debate on traineeships amongst the main labour market and education stakeholders was relatively polarised at the time of adoption of the QFT. **Employer representatives** argued that there should be a "probation period" for young people before signing a traineeship contract because of their "low" labour productivity. They recommended also an option for voluntary type of traineeships i.e. without payment, as well as lower than the minimum wage remuneration to be determined at the discretion of the employer.⁵³ These recommendations were not taken on board in the amendment to the Labour Code of 2014.

Trade union representatives were initially partly against traineeship contracts as they considered them as a way of prolonging the school-to-work transition for young people and negatively impacting young people's chances at stable employment.⁵⁴ The public debate was accompanied by a public consultation which led to the 2014 Labour Code amendment. Since then, there have been no major public debates on traineeships in the country. However, differences in views exist still today as evident from the interviews and research conducted for this study:

- From the point of view of **trade union representatives** involved in work with young people, students in general, are not adequately informed about traineeship vacancies and do not

⁵¹ The person shall have acquired a professional qualification in the last 2 years but shall not have any work experience in it.

⁵² See, <https://www.mlsp.government.bg/natsionalni-planove-za-deystvie-po-zaetostta>

⁵³ Based on employer stakeholder interview.

⁵⁴ Declaration of the Executive Council of CL Podkrepa", 5 July, 2013, <http://podkrepa.org/news/>

have a systematic approach in looking for these; furthermore, they are often not aware about their rights and duties as trainees.

- **PES representatives** highlighted that SMEs usually do not have sufficient capacity to invest in the competence development of students and/or upper secondary graduates and are likely to perceive traineeship rather as a short-term measure that gives them an access to a financial subsidy. Subsidies become even more important for SMEs in a situation of an overall economic stagnation particularly in the aftermath of the pandemic (and possibly during the Ukraine crisis) and thus, the sustainability dimension of traineeships (the possibility to hire trainees as regular employees) is not likely to be a priority.⁵⁵
- By way of contrast, most of the large **(multi)national companies** in Bulgaria have developed their own traineeship programmes which have become more structured over the last seven years.⁵⁶ The challenges in the case of large companies is that even though traineeship places are available, in certain sectors (e.g. electrical engineering) there is a lack of trainee supply.⁵⁷

4. Actions taken in response to the QFT

The QFT provided “food for thought”⁵⁸ to a public debate on open market traineeship that had already started in 2013 and can be considered in a large way as **contributing to the amendment of the Labour Code which followed in 2014 and that implemented the principles of the QFT into national legislation.**⁵⁹

It is not possible to fully assess the extent to which the Council Recommendation has had an impact/influence on improving the quality of traineeships in Bulgaria given the multitude of factors that may lead to improved traineeship opportunities. Of note is that many of the interviewed stakeholders (in particular employers) are not necessarily aware of the QFT as such although they do implement the QFT principles adopted in the Labour Code. However, it is clear that the QFT has provided legislators and stakeholders with insights into quality aspects of traineeships that have been directly strengthened or introduced in national legislation. For instance:

- The QFT principle about trainee supervision was adopted in the Labour Code as follows: ‘Traineeship should be carried out under the supervision of the employer, or a person appointed by him. A mentor can be any person who holds qualification in the same or similar profession, in which traineeship will be held, and has not less than 3 years of length of service or work experience in this profession [LC, Art. 233a (2)].
- In the context of ALMP traineeships, the supervision principle has been considered through the PES mediator programme launched in 2018 in which a mediator (typically a PES employee) acts as an intermediary between an employer and a trainee.⁶⁰ The aim of the programme is to increase the traineeship quality for both, trainees and employers whereby the latter depends on the involvement of the mediator which may vary from case to case.⁶¹

In order to gather further evidence on the impact of quality traineeships on young people, a focus group discussion with young trainees was held face-to-face in April 2022 at one of the biggest Bulgarian universities - the University of National and World Economy in Sofia. It was organised with the support of the Inter-University Centre for Career Development (ICCD)⁶² which facilitated the contact with the participants. The role of ICCD in matching would-be trainees with employers is

⁵⁵ Based on PES stakeholder interviews.

⁵⁶ Based on (university) career guidance stakeholder interview.

⁵⁷ Based on employer stakeholder interview.

⁵⁸ Based on a government stakeholder interview.

⁵⁹ Based on government stakeholder interview.

⁶⁰ The mentoring programme has a broader scope including traineeships, but also other mediation services provided by PES.

⁶¹ Based on PES stakeholder interview.

⁶² <https://iccd.unwe.bg/>

outstanding in the national context since fully-fledged career guidance services are not very common for universities and quite rare (if at all available) for upper secondary schools.⁶³ The box below provides details on the setting and results of the focus group discussion.

The views of trainees: focus group findings

Trainees' portrait

The focus group included four students⁶⁴ and was equally represented in terms of gender; three of the trainees were in their bachelor studies and one - in master studies. The group was diverse regards participants' study fields including sociology, business administration, applied informatics and economy of human resources. One participant had a disability, and another was with Ukrainian background speaking Bulgarian fluently.

All four trainees did their traineeships outside the education system – one of them accessed it through the free labour market and the rest were carried out within the framework of the 'Student practices 2' project (see Box 2).

The traineeship experiences revealed were mostly first, ongoing experiences, held **face-to-face**. Only one participant has completed several traineeships so far and he referred to the latest experience done during one of the national lockdowns.

Most of the traineeships took place within **SMEs**. The duration varied between two to six months, with some of the traineeships being full-time, other part-time. All traineeships were **paid** and included a **mentor**. In the case of the student with a completed traineeship, the document received at the end did not certify competences acquired by the trainee.

Traineeship experiences

Overall, trainees have had very positive experiences with the following aspects being highlighted:

- **Content of learning** – tasks performed by trainees were seen as relevant to their studies. Even when specific tasks were not very closely related, they still have provided trainees with some basic knowledge that was considered useful. The acquisition of **transversal skills** was seen as an asset, in particular, the ability to do things better and quicker, to communicate more precisely (in the case of online traineeships), to take responsibility (e.g. in providing trustworthy information), to develop entrepreneurial skills, to develop learning to learn skills i.e. being able to get out of one's comfort zone through performing new tasks now and then.
- **Environment** – for all students it was quite important to do the traineeship face-to-face as being among colleagues they can ask and learn from them, can also observe the work dynamics and culture of the company. One point addressed was that SME's, for instance, may not necessarily adapt their working conditions (in terms of physical access) for the needs of trainees with disabilities.
- **Mentor** – all trainees pointed out that their mentor was "there for them" when needed to give advice in solving difficult tasks. Thus, the **availability** of the mentor was considered very important.
- **Co-workers' overall attitude** – trainees appreciated when colleagues from the company took time to show or explain to them tasks they were not familiar with. Meeting other trainees at the company reassured them that the employer is open towards traineeships (and will possibly be treated "well"). Also, **flexibility** came out as an important issue, for example, when trainees need to leave earlier having an urgent appointment. On one

⁶³ For example, ICCD inform students about available traineeship opportunities, refers them to the 'National Career Days' organised twice per year by the most popular job portals in the country. The Center mediates between trainees and employers and this function is very important in the case of students/trainees with special needs.

⁶⁴ Initially six have confirmed participation, but two didn't arrived at the venue.

occasion, the employer expressed also readiness to extend the traineeship and even hire the student afterwards.

- **Remuneration** – trainees appreciated the fact that they are paid for their work. However, more important for them was that they were given an opportunity to try out things and decide what to do later on in their (career) life. “I am not there for the money, but for the competences I am supposed to acquire”. It should be distinguished, though, that, for instance, students that do not rely on e.g. the financial support of family, cannot afford unpaid or insufficiently paid traineeships

Student practices 2 project

The “Student practices 2” project is implemented by the Ministry of Education and co-financed by the EU. It provides students with the opportunity to carry out a practical training (which is not part of their study programme) in a real working environment. The activities cover students from 43 universities. The universities administer the so-called “practices” through signing contracts with employers (large companies, but also SMEs) and students. Although the Labour Code is not applied to these contracts (since they are either employment nor traineeship contracts), the practices can be considered as traineeships by their nature – they are up to 6 months, aim to improve students’ employment prospects through the acquisition of occupational and transversal skills. Furthermore, students have two mentors - one at the company and one at the university which can be seen as a quality assurance mechanism. The project is significant in relation to qualitative and quantitative outputs e.g. 40.428 students have been selected for practices so far and upon their completion many of them are offered a regular employment.⁶⁵ Also, the project is significant as it opens up opportunities to students to complete a traineeship in their speciality already during the course of studies which results in a smoother school-to-work transition given that employers are more likely to select trainees which already have some practical experience.

Source: <https://praktiki.mon.bg>. Additional information provided based on email request responded by the project manager.

5. Key evaluation findings

5.1. Effectiveness

The direct effect of implementation of the QFT principles into the Bulgarian Labour code can be seen through the **immediate increase of traineeship contracts in the years following the Labour Code amendment** (2015 and 2016). The trend was reversed by a steady decrease (2017-2019) which continued in 2020-2021, also as a consequence of the COVID-19 pandemic. The downward trend may indicate to the need of more and better incentives for companies (in particular SMEs) to provide traineeships.

In **legislative terms there have not been any major obstacles in implementing the principles of the QFT in law**. In relation to open market traineeships, the ‘General Labour Inspectorate’ (GLI) - an executive agency under the Ministry of Labour and Social Policy which controls the enforcement of labour legislation, regularly monitors the implementation of the Labour Code, including compliance with requirements concerning traineeship employment contracts. Between 2014 and 2021, the Labour Inspectorate detected 22 violations in total or less than 1% from the overall number of registered traineeship contracts illustrated in Figure 1. The violations related to the **content of the**

⁶⁵ Based on information provided upon personal request.

traineeship contract as regulated in the LC [Art 233b, (2)]⁶⁶ e.g. the content didn't specify the manner and form in which practical skills were learned, the name and position of the mentor, the duration of the contract). Data provided did not specify further aspects.

However, the rather general formulation of the QFT principles related to learning content and recognition, has led to **some difficulties in their implementation on the ground**.⁶⁷ As mentioned earlier, the Labour Code stipulates that employers shall provide trainees with a document upon traineeship completion which acknowledges/certifies learning outcomes acquired and provides a 'recommendation' for the trainee's further personal professional development. Firstly, the terms 'certificate' and 'recommendation' have different meanings and cannot be included in one and the same document upon completion of traineeship, as required in the legislation. Secondly, trainees rarely, if at all, receive a certificate from employers that is based on assessment of their key skills and competences acquired during the traineeship.⁶⁸ Furthermore, while very helpful, such an assessment includes additional costs for the employer, which in the case of SMEs may be a disincentive to providing quality traineeships.

The research conducted for this study also identified evidence of implementation of the QFT not working as well on the ground as it does on paper.

- "Many NGOs and private organisations provide traineeships which are usually of short duration (a few hours per week), unpaid and mostly include operational and administrative work".⁶⁹
- "[Under the Employment Promotion Act] employers are entitled to receive a state subsidy for up to 9 months per trainee. Once the subsidy is exhausted (after 9 months), employers (e.g. SMEs) do not usually offer regular employment to the trainees".⁷⁰

While not directly linked to the principles of the QFT, the research identified additional issues with the traineeships offered in Bulgaria on the ground which are relevant to consider in the study as they shed light on the degree to which legislation on paper is implemented in practice. For example:

- "According to national legislation, open market traineeship should be paid. In practice, this is not always the case. Some employers use probation periods to check whether trainees can perform the tasks in the company. These periods are usually unpaid and can be a month or longer".⁷¹
- "Trainees that are attractive for employers are typically students in their 2nd or 3rd bachelor year (e.g. law students) who have some knowledge in the subject, but are paid less since they haven't completed their studies yet. As soon as the trainees gain more experience and ask for higher wages, employers tend to replace them by new trainees".⁷²

As regards **ALMP traineeships**, PES and its territorial units (regional labour services and local labour offices) organise traineeships in accordance with the national employment action plans and are also responsible for monitoring and controlling the quality of traineeships e.g. through inspections. In some cases, inspections include representatives of the 'General Labour Inspectorate'. The assessment reports on the net effect of ALMPs at individual level point out that **some ALMP traineeships were highly effective in exiting unemployment**, for instance, roughly 80% of the trainees who in 2015 and 2017 participated in the Career Start programme (680 trainees on average for each of the years) managed to find a regular employment after completing their traineeship.⁷³ In comparison, ALMP traineeship measures regulated in the Employment Promotion Act (EPA) Art. 41 were less effective pointing to a downward trend i.e. 56% of the trainees involved

⁶⁶ General Labour Inspectorate (GLI).

⁶⁷ Based on government stakeholder interview.

⁶⁸ Based on focus group.

⁶⁹ Based on an email input by NGO stakeholder.

⁷⁰ Based on PES stakeholder interview.

⁷¹ Based on trade union stakeholder interview.

⁷² Based on trade union stakeholder interview.

⁷³ Ministry of Labour 2017, 2019

in these measures in 2017 (17 young people in total) could find regular employment at the end of the traineeship compared to 68% (out of 32 people) in 2015.⁷⁴

Given that in Bulgaria, surveys on traineeships are not conducted, and that publicly available administrative data on open market traineeships in particular is limited⁷⁵ it is not possible to provide any evidenced-based information about sectors or (social) groups of young people for whom QFT has been particularly 'successful' or 'unsuccessful'. Interviewed stakeholders however pointed out that **upper secondary graduates are under-represented among trainees**. Of note is that, students coming from smaller cities, towns or villages are less able to partake in traineeships since they cannot usually afford unpaid traineeships (even though the content of the latter may be related to their study field). Therefore, they tend to prefer to take up paid jobs – even those for which they are over-qualified – instead of unpaid traineeships⁷⁶. In relation to trainees with disabilities, the focus group participant representing this group highlighted that traineeship providers do not necessarily comply with accessibility requirements although solutions for some situations are found, for example, through working from home.

5.2. Efficiency

There is no data available about costs or quantifiable benefits associated with the implementation of the QFT. However, in relation to costs associated with the implementation of OMT and ALMP traineeships more broadly, from the perspective of traineeship providers, **the main costs concern trainees' remuneration and social insurance contributions as well as the wages of mentors**. In relation to OMTs, lower costs include recruitment and selection costs, equipment and learning materials costs, and possibly travel costs and meal vouchers. One important cost that is very difficult to quantify relates to foregone productive work (during training); this is also because if trainees are hired with a permanent contract after completing their traineeship, some of these costs will turn into benefits which further complicates the estimation.

Given that open market trainees receive the minimum wage if they work full time (which is not always the case) the monthly remuneration cost for one trainee are around 350 EUR. Another (very rough) proxy that can be made of costs of traineeships is through the "Student practices 2" project: its overall budget is approximately EUR 23,000.000 and the aim is to involve 44.000 higher education students in a traineeship. Thus, **a traineeship costs around EUR 522 per participant** (including an academic and a company mentor) which is certainly an overestimation since detailed project costs are not publicly available. The traineeship period includes 240 hours.

While bigger employers are likely to estimate benefits higher than costs (see Box 3) the latter may not be the case for SMEs as they usually lack traineeship infrastructure: mentors, structured traineeship programmes, learning materials, etc.. Crucial in this context is the provision of financial incentives by the state (e.g. the one regulated under the Employment Promotion Act). The low number of trainees (e.g. 17 trainees in total for 2017) covered through this measure may point to the need for additional state support for SMEs to ensure they are able to offer quality traineeships in line with the principles of the QFT. Overall, traineeships within EU-funded programmes (as compared to those subsidised by the state budget only) are seen as more attractive for both trainees and employers since the funding (and therefore costs coverage) is higher.⁷⁷

5.3. Coherence

The coherence between the QFT and other national and EU policies on youth/employment/school-to-work transition can be seen as moderate i.e. **although most QFT principles have been**

⁷⁴ Ministry of Labour 2017, 2019

⁷⁵ E.g. information about the economic sector of training providers is considered 'confidential' by public authorities and the country researcher was not provided with it. The same refers to socio-demographic data of trainees.

⁷⁶ Based on trade union stakeholder interview.

⁷⁷ Based on PES stakeholder interview.

implemented into national legislation for both ALMP and open market traineeships, there is some incoherence between the Labour Code and the QFT, in particular in *relation to*:

- *Duration of the traineeship* - according to the Labour Code, the duration of the traineeship employment contract cannot be less than six months and not more than twelve months [Art. 233b (3)]. For ALMP traineeships, employers can receive subsidies for trainees for up to nine months (Art. 41, Employment Promotion Act, EPA) which determines, more or less, the duration of ALMP traineeships.
- *Recognition* through an assessment and a certificate - within 14 days after completion of the traineeship, the employer shall issue a document to the trainee which can be used when applying for a job with another employer (LC, Art 233c). However, the national legislation does not provide clear rules about the content of the document, for instance, how it shall acknowledge knowledge, skills and competences acquired during the traineeship.
- *Traineeship vacancies include information on traineeship conditions* – *this is not regulated in legislation in relation to both open market and ALMP traineeships*.

Of note is also that the Labour Code specifies that a company can provide a traineeship to the same person only once (an aspect not included in the QFT). The legal grounds for this is to avoid situations where traineeships are used as replacement for entry jobs.

5.4. EU added value

The **added value of QFT is that it has contributed to the open debate leading to the amendment of the Labour Code** which defined and regulated the traineeship contract. This amendment enabled the implementation of most of the QFT principles in the regulatory framework of open market traineeships, principles which had not been in place in existing legislation before the QFT.

As outlined above, the volume effect of implementing the QFT principles is expressed through the **immediate increase of traineeship contracts** in the years following the Labour Code amendment (2015 and 2016). The trend was reversed by a steady decrease (2017-2019) which continued also in 2020-2021. This downward trend may indicate to the need of more and better incentives for companies (in particular SMEs) to provide traineeships.

In terms of scope effects, the QFT principles adopted in national legislation have **broadened the focus of the national legislative framework through the regulation of open market traineeships** which was previously not in place.

There is no hard evidence of the role effects of the QFT i.e. of structural changes in employment/education/training policy. The biggest benefit for traineeship providers of OMT and ALMP traineeships in general is the possibility to retain their trainees as regular employees at the end of the training thus saving recruitment and training costs for new employees and quickly addressing skills shortages in specific sectors. The biggest benefit for trainees is that they are able to acquire practical skills in their profession and study field which supports smoother and quicker school-to-work transition. The latter is however more often the case for trainees at large companies and less so for trainees at SMEs.⁷⁸

Discontinuing the QFT at EU level will most likely result in lack of external drivers for public debate and reforms in the national legislation and policies.⁷⁹

⁷⁸ Based on interviews.

⁷⁹ Based on interviews.

5.5. Relevance

The available data points to the fact that QFT principles implemented into national legislation have different degrees of relevance for different stakeholder groups, depending on their interests, organisational aims and (human and financial) resources. For example, **larger employers** are interested in and also have the resources for developing quality traineeships and therefore view the principles as relevant for enhancing labour market insertion in the specific company and for addressing skills shortages (e.g. in the energy sector). The principles considered most relevant by these stakeholders are those that relate to the **learning content and the tailored supervision and guidance provided by the supervisor** as these consider the needs of the company as well as the trainee and thus provide a win-win situation for all. Of note is that in the case of large employers, the provision of both traineeships and apprenticeship placements may form part of a company's overall approach towards competence development of young people. Therefore, in this context, **quality principles for traineeships can reinforce those of apprenticeships and vice versa**. For instance, the large company ELBG has been involved in the national apprenticeship piloting project⁸⁰ whereby former apprentices do have higher chances of becoming trainees later on⁸¹. The example of the ELBG traineeship programme is included in the box below.

Quality traineeships filling the skills needs of employers

Electrohold Bulgaria EOOD⁸² (hereafter ELBG, former CEZ Group in Bulgaria) was established in 2005 and operates in the energy sector. ELBG has a summer traineeship programme called 'Energy for the future'⁸³ (former CEZ Academy) targeting students from their first to last semester with a duration between one to three months, working four days per week. Trainees receive remuneration including meal vouchers and are registered with a traineeship contract at the National Revenue Agency. Potential participants are mostly recruited through career days organised at universities, it is also advertised in some of the biggest online job vacancies sites. The aim of the programme is to present the activities of the company in the different fields and the opportunities it provides so that students can make an informed decision about their further career pathway.

Background

The programme started in 2008 and participants' number has been varying, e.g. in the years between 2017-2019 it was around 100 trainees or more per year while during 2020/21 the number dropped to less than 40 due also to the pandemic. Trainees represent on average between 5%-7% of the overall number of employees. Since 2016 between 80% and 90% (roughly) of the overall number of trainees choose to extend their traineeship i.e. trainees can repeat the programme several times e.g. during the 1st, 2nd, 3rd year of studies which enables them, after graduation, to start work at the ELBG immediately. As a result, many of the current line managers have started their careers as trainees.

Tailored traineeship approach

Usually, the director of the division where the traineeship will take place conducts an interview with the trainee. The interview provides information about the nature of work in the division, possibilities for rotation between divisions, etc. During the interview the focus is not on knowledge and competences acquired at the university, but on what is required from the trainee in terms of practical skills.

The role of the mentor

⁸⁰ This was done through the Domino project (2015-2019), see <https://dominoproject.bg/en/>.

⁸¹ Based on employer stakeholder interview.

⁸² <https://electrohold.bg/bg/>

⁸³ By 2022, the company is one of the leading utility companies in Bulgaria in the field of electricity distribution and supply, insurance, leasing, car sales, investments and asset management. The group of ELBG employs over 3.000 specialists with different educational and professional background. <https://energyforthefuture.electrohold.bg/bg/>

All trainees have a mentor who is a specialist in his/her professional field. Typically, one mentor has one student only, rarely two. The mentor supports the trainee's acquisition of practical skills on the job. The role of the mentor is associated also with one of the company's core principles - working in team.

Costs

Costs include costs for selection and recruitment, remuneration costs (depending on trainees' working days), compulsory social insurance contributions, costs for mentors. There are also some minor costs such as the meal vouchers mentioned above, travel costs, possibly, costs for learning material, facility and equipment costs. Overall, it is difficult to estimate the costs since foregone productive costs (e.g., during training on site) cannot be fully measured. In addition, trainees who remain as regular employees after the traineeship will obviously save costs for personnel selection, training, etc., however, this is difficult to anticipate and complicates the cost-benefit estimation.

Benefits

Generally, the benefits of the traineeship programme are estimated higher than the costs. Benefits relate to motivating young people for the profession; giving them job perspectives in the company, in the sector, convincing them to remain in Bulgaria. The fact that the directors of the division are two former trainees (one of them becoming a manager at the age of 25) is seen as an achievement. Also, most of the employees in the division (75%) had completed the company's traineeship programme.

The overall attitude of the company (including directors of divisions) has evolved during the years with the traineeship programme and also due to other measures⁸⁴. For instance, directors of divisions prefer to hire former trainees than to look for new employees. The change in the overall attitude has occurred in part out of necessity to reverse the general understanding of the electrician profession, typically associated with manual work, and make it more attractive for pupils and students, tackling also skills shortages in the energy sector.

Challenges

The biggest challenge is to retain former trainees in the company after university graduation. A structural challenge is to fulfil the available traineeship places which is related to the lack of enough applicants, for instance, universities face lack of interest of potential students in the field of electrical engineering. The lack of interest relates to the 'negative' image of the sector, the complexity of the study field e.g., many students drop out at the beginning or the middle of their studies and do not graduate at all. Furthermore, students are more interested in 'trendy' studies such as IT specialties, tourism.

Source: based on interviews.

For **SMEs**, the relevance of certain QFT aspects (availability of a mentor, possibilities to acquire occupational and transversal skills related to students' specialty) is not as high because even when state subsidies cover some major traineeship costs (e.g. remuneration, social insurance), these other elements are challenging and costly to put in place. Trainees are less frequently hired by SMEs after completing their traineeship, thus the school-to-employment transition of SME trainees may take longer (i.e. involving several traineeships) as compared to trainees of larger companies.

Administrative data shows a downward trend of open market traineeships in recent years, accelerated by the impact of the pandemic on the labour market. This may point to **difficulties in traineeship implementation and the need of (legislative) or policy adjustments to ensure the QFT remains relevant** in the Bulgarian context. The following adjustments have been suggested by interviewed stakeholders:

⁸⁴ For instance, initiatives related to dual VET.

- the need to better specify or at least provide guidelines for how to certify the acquisition of learning experience;
- the need to further elaborate on the principle of recognition of knowledge, skills and competences (KSC) i.e. employers usually do not attest knowledge, skills and competences acquired based on assessment and certification. Furthermore, LC stipulates that employers shall provide trainees with a document upon traineeship completion which a) acknowledges learning outcomes acquired and b) provides a 'recommendation' for trainee's further personal professional development. The mixing up of a 'certificate' with a 'recommendation' creates confusion and difficulties in implementation;
- the need to clearly divide responsibilities between the different actors involved in traineeship mediation particularly in relation to unemployed young people⁸⁵ e.g. specifying the role of PES and career guidance services strengthening the cooperation between them;
- recovery adjustments tackling the negative effects of the pandemic – organising traineeships online is a challenge especially in some sectors (e.g. energy) due to the nature of work. Findings from the focus group also highlighted trainees' preference for face-to-face traineeships.

85 Based on PES stakeholder interview.

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List of interviewed stakeholders

Ministry of Labour and Social Affairs

Public Employment Service

Bulgarian Industrial Association (employer representative)

Electrohold Bulgaria EOOD

Interuniversity Center for Career Development (ICCD), University of National and World Economy

Confederation of Labour Podkrepa

Council of Women in Business, Bulgaria

List of stakeholders providing data (including documents) by email:

General Labour Inspectorate

Ministry of Education, "Student Practices 2"

National Revenue Agency

NGO representative (wishing to remain anonymous)

Focus group: Participants asked to remain anonymous. The focus group included four students (two additional students were confirmed, but did not show up), two females and two males in bachelor and master studies, one of them with special needs.

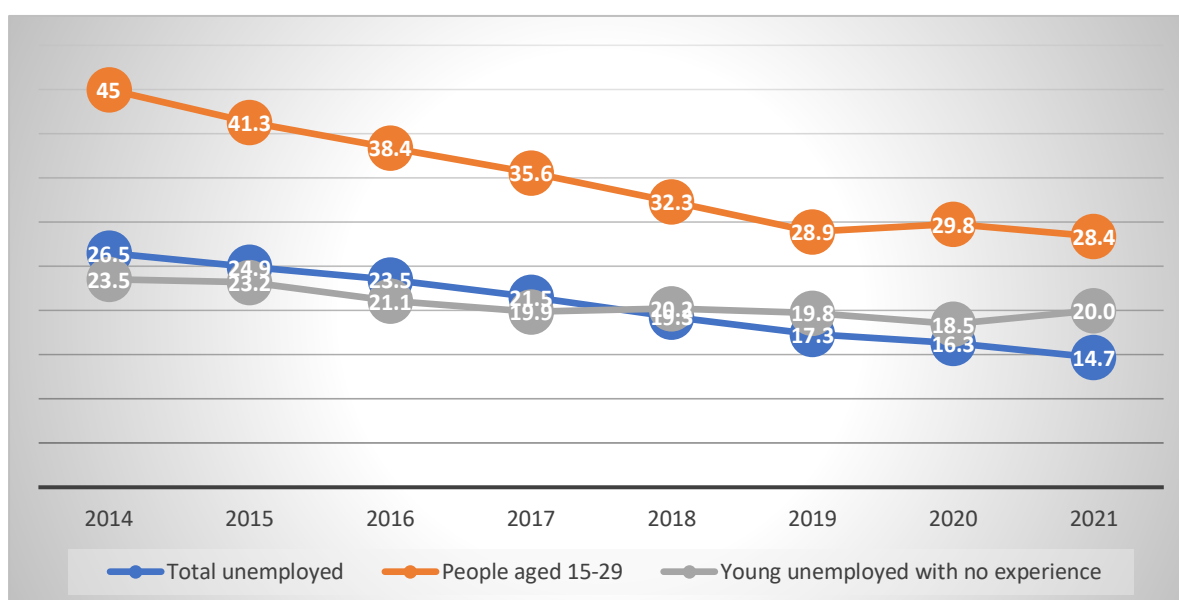
Greece

1. Overview of the target population and the development of traineeships

1.1. Main trends in youth unemployment and school-to-work transition

The Greek economy suffered significant macroeconomic changes during the economic and financial crisis of 2008, which aggravated existing structural problems of the labour market.⁸⁶ The major problem was the youth unemployment rate (15-29 years old), which reached 45% in 2014 (see Figure 4 below). Within this group, those aged 15-24 were most affected with their level of unemployment reaching 52% in 2014.⁸⁷ Unemployment among young people aged 20-29 also remained high, although active employment policies and legislative changes between 2012-2014 helped to reduce youth unemployment (20-29- years-old) from 47% in 2013 to 44% in 2014.⁸⁸

Figure 4. Share of unemployed for the entire of the population and for people aged 15-29, 2014-2021



Source: Hellenic Statistical Authority (ELSTAT). *Greece in Figures* (April-June 2022). Author's own processing.

Since 2014, the unemployment rate of young people aged 15-29 has fallen, from 45% (573.500 people) in 2014 to 28% (192.000 people) in 2021 but Greece continues to have one of the highest rates across the EU.⁸⁹

The key point of **public debate** in 2014 was how to tackle youth unemployment, achieve an effective relationship between training and employment and address skills mismatches.⁹⁰ The Memorandum of Understanding for a three-year European Stability Mechanism (ESM) programme for Greece in 2015 and the National Strategic Framework for upgrading vocational education and training (VET) provided specific requirements for enhancing the role of VET and its conjunction with the overall development planning of the country.⁹¹ In addition, the National Action Plan to implement “Youth Guarantee” in Greece has been elaborated to provide a coherent set of actions targeted to young

⁸⁶ Bank of Greece, 2014.

⁸⁷ European Commission 2014, p. 11.

⁸⁸ Bank of Greece 2015, p. 70.

⁸⁹ European Commission, 2021

⁹⁰ EEPO, 2016.

⁹¹ European Commission, 2015; Ministry of Education, Research and Religion, 2016.

unemployed and NEETs, which give priority to activation, traineeships, work-based learning and job search assistance.⁹²

1.2 The prevalence of traineeships in Greece

Great emphasis has been placed on traineeships in Greece since 2014 in order to improve young people's transitions from education to employment.⁹³ Traineeships are prevalent in Greece since 1980. They are traditionally held in upper secondary vocational training schools and higher education institutions (HEIs). Traineeships are not obligatory; they are optional and at the discretion of education and training institutions to set the terms and conditions of their traineeship programmes. The trainees are students in vocational training schools and in HEIs, who are unemployed that need to improve their skills.

National statistics do not provide data for traineeships. The only source is the "Operational Programme for the Development of Human Workforce, Education and Lifelong Learning 2014-2020", which involved 50.000 young people in traineeships over the funding period, as illustrated in Figure 5.⁹⁴

Figure 5. Number of young people expected to take up traineeships during the programming period 2014-2020

Title of the traineeship programme	No. of participants
Voucher for traineeship for young people aged 25-29 in private companies	30.000 (mostly NEETs)
Voucher for traineeship for young people up to 29 years old in tourism private companies	8.000
Voucher for traineeship for young people aged 18-24 in private companies under "YG"	12.000
Specific programmes of traineeship for young people aged 15-29, graduates from post-secondary education, implemented by the social partners	7.000

Source: Paidousi 2014, pp. 100-102.

According to the Implementation Report 2015, the progress for the above traineeships was: (i) 25.183 young people in a 6-month traineeship, (ii) 10.258 in a 6-month traineeship, and (iii) 1.100 higher education graduates and 6.900 secondary and post-secondary graduates in traineeship in tourism companies.⁹⁵ Young unemployed participated in traineeships in several sectors of the Greek economy and especially in the tourism industry, as well as in the growing sectors of the economy, such as energy, environment, information technology.⁹⁶

2. National and regional legislation and policies relevant to quality traineeships

Traineeships in Greece cannot be understood separately from continuing vocational training (CVT). They are implemented in the context of training or employment programmes as part of ALMPs to support the unemployed. The **national legislation explicitly regulates traineeships only in the framework of education or ALMP traineeships**. Open market traineeships (OMT) are not regulated specifically and are therefore considered regular employment, subject to national labour law.

⁹² Ministry of Labour, Social Security and Welfare, 2014; EEPO, 2016.

⁹³ European Commission, 2015.

⁹⁴ Paidousi 2014, pp. 95-129.

⁹⁵ Ministry of Development and Investment, 2015

⁹⁶ EEPO, 2016.

The key legislative framework governing ALMP traineeships is the 2020 Law 4763/2020, which establishes a national VET system and strengthens the role of traineeships in all levels of education.⁹⁷ Article 56 of the Law provides that traineeships can be part of CVT programmes, organised under the responsibility of Lifelong Learning Centres and implemented in public and wider public bodies sector or in private sector companies. Ministerial Decision 79732 of 27.07.2020 defines the framework of quality standards for the design and implementation of CVT programmes and traineeships as well as the quality standards of traineeship in companies to prevent employee substitution by trainees.

In 2022, a new Ministerial Decision 82759/Government Gazette B' 4581/30.08.2022 came into force, establishing a **Planning and Management System for the implementation of co-financed/subsidized programmes of non-formal learning, CVT, and General Adult Education**. The Decision provides the general quality standards of traineeships, such as ensuring the coherence of the traineeship position with the training, informing companies of educational requirements, appointing a Traineeship Manager, defining the traineeship subjects, appropriate supervision through the Traineeship Supervisor, and evaluation.⁹⁸ The need for preventing measures to avoid the phenomenon of substitution of employees by trainees is highlighted in also addressed, through the recommendation that the duration of the traineeship does not exceed 50% of the total duration of the CVT programme, especially in programmes of long duration, i.e. more than 400 hours.

By contrast, open market traineeships offered by companies or voluntary non-profit organisations are not regulated at all. As a result, **any open market traineeship is considered as regular employment subject** to the national labour law (minimum wage, social security coverage, etc.), namely to the Law 4808/2021 For the Protection of Labour and the Law 4921/2022 Jobs Again.⁹⁹

3. Stakeholder views on traineeships

Employer representatives argue that traineeships in large companies seem to have a more significant impact on the trainees whilst also helping companies improve their brand label and build a team of trained staff.

Employer representatives of SMEs argue that the opportunities to implement traineeships depends on the size of companies. First, it seems that SMEs do not see the need for hiring trainees as most SMEs operate in the service sector and can buy customised ready-made packages or services.¹⁰⁰ Second, SMEs are usually run by family members. Moreover, traineeships in CVT programmes are of short duration, unguided, and without binding institutional and educational obligations. This creates an unfavourable context for the implementation of traineeships in small companies, who benefit from longer traineeships. Very small enterprises that have less than 9 employees face big difficulties with traineeships. They have limited management capabilities and cannot handle the administrative burden of the traineeship. They also have difficulties in recognising the learning objective, since traineeships should be linked to theoretical training. Medium-sized enterprises with 10 to 50 employees and a basic business plan have more opportunities to implement traineeships, but have not taken full advantage of them. In addition to internal factors, SMEs do not offer traineeships because they do not have planning based on their strategic needs and therefore do not treat traineeships as an investment. Having intermediate structures or shared public laboratory infrastructures could be a solution to help SMEs by absorbing the administrative burden of traineeships. Finally, it is necessary to give incentives that create better reception conditions for the company, such as rewards or tax breaks, i.e. incentives that build a positive mentality.¹⁰¹

According to **youth organisation and trade union representatives**, when entering a traineeship young people are satisfied in that they are able to get experience from a real working environment.

⁹⁷ Law 4763/2020.

⁹⁸ Ministerial Decision 82759/Government Gazette B' 4581/30.08.2022.

⁹⁹ Law 4808/2021; Law 4921/2022.

¹⁰⁰ Based on interviews.

¹⁰¹ Based on interviews.

However, the fact that the traineeship lasts for a duration up to 6 months and there is often no formal job offer after completion leads to a risk of potential exploitation of trainees by the employers during the 6-month traineeship without making any commitment for future employment.¹⁰² The certification of the job and skills acquired during the traineeships is another area of concern raised by youth organisations and trade unions. At present, there is no certification for either the content or the work done during the traineeship.

4. Actions taken in response to the QFT

The QFT in Greece contributed to a public debate on the role of traineeships and how best to ensure they support young people into the labour market.¹⁰³ Several reform efforts have been implemented since 2014 which ensure the adequate implementation of QFT principles for ALMP traineeships into national law.

- Since 2014, a major reform of the VET system has been initiated by the Ministry of Education aimed at (among others): improving its ability to support the transition from education to employment and upgrading and expanding traineeships. The reform started with 2013 legislation, which aimed at regulating quality traineeships for vocational school students. In particular, Law 4186/2013 “Restructuring secondary education” established the previous quality framework for traineeships in Greece, responding to the need for better linking VET offer and the labour market demands and for active participation of stakeholders.
- Later, Law 4386/2016 strengthened the work-based component of VET and increased apprenticeships and work-based learning to ensure that young people will acquire skills that will lead to better jobs prospects.
- Finally, the most recent reform was initiated with Law 4763/2020, which establishes a national VET system and strengthens the role of traineeships and CVT. The Law sets the framework of quality standards of traineeships, which are organised under the responsibility of Centres for Lifelong Learning,. The majority of principles in the QFT related to a written agreement, supervisor, working conditions, and health insurance are adequately implemented in the national legislation.

5. Key evaluation findings

5.1 Effectiveness

QFT principles are largely implemented in national legislation for **ALMP traineeships** in Greece. The main components of traineeships corresponding to QFT principles, namely the written contract, insurance against the risk of accident, and the provision of a supervisor, existed before 2014. Since 2014, new laws supported significant improvements to traineeships, as outlined above, whilst efforts have also been made to increase transparency (Law 4554/2018, Article 10), with the introduction of safeguards and control from the Labour Inspection Body (SEPE) to prevent trainees being used to replace employees:

- Enforcement mechanisms under the responsibility of the Labour Inspection Body (SEPE) aim to ensure minimum wage, social security and decent working conditions. To support in this, since 2018, employers have been obliged to declare their trainees and traineeships in the information system of the Ministry of Labour “ERGANI” to prevent undeclared work.¹⁰⁴ The ERGANI electronic system has helped significantly because traineeships, trainees,

¹⁰² Based on interviews.

¹⁰³ EEPO, 2016.

¹⁰⁴ Employment Committee, 2019.

companies or organisations, and any changes to the terms and duration of the traineeship are now recorded, which facilitates monitoring, control and collection and publication of statistics.¹⁰⁵

- Furthermore, monitoring and management control mechanisms have been put in place by the ESF National Executive Structures, since traineeships are mainly funded by the ESF, the State budget and the employer cost. No negative effects have been mentioned.
- There have also been improvements in the PES towards ensuring a more individualised approach to traineeship offers to ensure traineeships align with skills needs of the individual which have had a significant impact on the quality of ALMP traineeships, as detailed in the Box below.

Trainees' personalised guidance and timely activation from PES perspective

The Manpower Employment Organisation (OAED), which was renamed in 2022 to the Public Employment Service (DYPA), i.e. the Greek PES and main provider of ALMPs, carried out several reforms to ensure personalised guidance and activation.¹⁰⁶ The personalised approach starts with a personal interview of the unemployed person conducted by a job counsellor, who acts as an employment mediator between the PES and the unemployed person. To facilitate the personalised approach, Law 4921/2022 established a Zoom communication between the unemployed person and the job counsellor¹⁰⁷ so that the counsellor can carry out a profiling process which aims to identify the right measures according to the level of support each unemployed person needs. The new profiling methodology is based on establishing specific identification criteria, which will contribute to classifying jobseekers into groups based on their personal traits. These are recorded during the registration process or filled in the questionnaire. Then, the counsellor fills a Curriculum Vitae (CV) in the PES IT System and creates an Individual Action Plan (IAP) using adequate information on dynamic sectors and occupations.

In the framework of traineeships, the personalised guidance and activation is ensured through the training provider who in collaboration with the beneficiary and taking into account his/her skills, profile, and preferences and in conjunction with traineeship position qualifications required, signs a tripartite agreement (training provider, beneficiary and enterprise for the job-training), which indicates the theoretical training content, the traineeship position and other mutual obligations.¹⁰⁸

According to the Employment Committee Review on the Youth Guarantee in Greece (2019)¹⁰⁹, the IAP is the result of the personalised approach process and includes an agreement between the job counsellor and the unemployed about the measures to be taken and the timeframe for the IAP implementation. This agreement aims to help the unemployed person to (re)enter the labour market either by up-skilling him/her or by providing a quality offer.

The PES job counsellors provide personal counselling services to potential beneficiaries under ALMPs in two obligatory employment counselling sessions: (i) at their time of entry into ("Entry Personal Employment Counselling") to determine his/her educational and occupational profile and prioritise his/her occupational options and (ii) at the time of exit from the programme ("Exit Personal Employment Counselling") to record his/her new skills acquired during the programme and set out the next steps to be taken for his/her re-integration into the labour market.¹¹⁰

Overall, this personalised approach and guidance is considered to be one of the most important reforms to have taken place in recent years, as it changed the way that unemployed enter ALMP traineeships.

However, **several main weaknesses in terms of implementation of the QFT on the ground remain**. These are centred on the monitoring and evaluation of QFT principles, as well as the recognition and certification of skills acquired during the traineeship.

According to trade unions and youth representatives, more robust information on how traineeships are implemented, how traineeship results are measured, and how many trainees have been inserted in the labour market after their traineeship needs to be collected to fully assess the degree of

¹⁰⁵ Data for cases of violation was requested from the Ministry of Labour, respectively SEPE, but information is still pending.

¹⁰⁶ Employment Committee, 2019.

¹⁰⁷ Law 4921/2022.

¹⁰⁸ Employment Committee 2019.

¹⁰⁹ Employment Committee 2019, p.11.

¹¹⁰ Employment Committee 2019.

effectiveness of quality traineeships and of the QFT¹¹¹ **Trade union representatives in particular believe that the quality of ALMP traineeships is very low.** The evaluation report of the Youth Guarantee Interventions supports this, finding evidence of substitution effects, low degree of coverage of the needs of the companies, and the lack of monitoring and evaluation, as well as for some problems with the written agreement or the remuneration. While 2020 legislation clearly defines the framework of quality standards for the design and implementation of traineeships, **in practice, ALMPs traineeship vacancies do not include all necessary information.**

From the perspective of the Ministry of Labour, large companies and SMEs seem to be short-sighted and reluctant to invest in the training and employment of young people. The 'de minimis' rule had also some impact on employers' mentality. For SMEs, in particular, the challenge is how they can integrate traineeships into their working culture and recruitment model and be convinced of their added value. On the other hand, companies face very large skills shortages, especially in the fields of energy, information and communication technologies, while the supply of skills results from multiple fields of study that do not meet the needs of the labour market.

The implementation of the QFT for open market traineeships appears to be very low, mainly due to the absence of a legal framework. In practice, companies do comply with certain quality principles either on their own initiative or because they are bound by the employment contract and labour law. Traineeships schemes designed by social partners also follow the rules of ALMP traineeships and are thus generally in line with the QFT.¹¹² However, given the absence of a legal framework regulating open market traineeships, large companies have great margin of discretion to design their own traineeship and decide about the content of vacancies. They usually choose to include the minimum information in the vacancies. The fact that open market traineeships are concluded with fixed-term employment contracts due to the lack of a legal framework also places a burden on businesses, which discourages them from investing in quality traineeships.

Despite this, there is evidence that the **impact on trainees of traineeships is positive.** Young unemployed people participated in traineeships in several sectors of the Greek economy and especially in the tourism industry, as well as in the growing sectors of the economy, such as energy, environment, information technology.¹¹³ An example of a traineeship programme with positive impact on trainees is included in the box below.

Open market traineeships in engineering – Mytilineos programme 'Engineers in Action'¹¹⁴:

Tailored traineeship approach

In this direction, the company offers the program "Engineers in Action" since 2014 to young engineers aspiring to acquire working experience. The program lasts 12 months and gives the opportunity to young engineers to: a) receive training in real working conditions; b) participate in complex projects to get familiar with the company's functions; c) attend a targeted training program to develop their skills and capabilities; d) receive mentoring and feedback from company's executives and e) join the company's team after completing the programme until a relevant position becomes available.

Trainee testimonials

- According to the trainees' testimonials about what "Engineers in Action" meant to them, listed indicatively by specialty and year of program attendance, a good quality traineeship should have the following characteristics:¹¹⁵
- Civil Engineer 2019/20: "I thought that the Engineers in Action program could be a great opportunity for me to train in real working conditions, to join the workforce of one of the largest companies in

¹¹¹ Based on interviews.

¹¹² EEPO, 2016

¹¹³ EEPO, 2016.

¹¹⁴ MYTILINEOS is a leading global industrial and energy company, starting as a small metallurgy family business in 1908 and evolving since the 1990s into a strong company with international activity. The company has four Business Units dealing with power and gas, metallurgy, renewables and storage and sustainable engineering solutions. Top priority for the company is Sustainable Development and Corporate Social Responsibility. The company's workforce includes 4.820 employees and shows a sense of responsibility and consistency in supporting the professional development of its people, <https://www.mytilineos.gr/who-we-are>

¹¹⁵ MYTILINEOS Company, 2022.

the country and in any case to get clear view of an engineer's work and the profession's requirements.

- Electrical Engineer 2019/20: "...The program's assessment process did not resemble anything like the typical interview process of a candidate. It was a unique three-step experience culminating in the group and individual activities carried out at the Simulation Center at the Company's headquarters..."
- Production Engineering and Management 2018/19: "...When I was selected to participate in the program, I had never imagined that it would be a traineeship like similar opportunities available at that time. There was a strong emphasis on the fact that Engineers in Action would be able to work on real projects and asked to find solutions to real problems. I believed I would acquire expertise and ways of handling complex issues. I had hoped I would be pushed and treated by my colleagues as equal to equal. It finally turned out that the program has offered me more than I expected..."
- Mining & Minerals Engineer 2018/19: "...The program was enriching, but I will focus on the most important learning of this period. I have learned to prepare, organize my time, and plan my daily routine more effectively (meetings, individual tasks, reports). I also strengthened my communication skills, as I worked with many different people. I saw the difference between active listening and simply listening. I understood how important it is to ask the right questions to get the answers you need. Finally, through the training with all program partners, I learned to think in a more structured but at the same time creative way..."
- Mining / Metallurgy Engineer 2016/17: "...After a year of training at MYTILINEOS, I felt ready to respond to any professional challenge. Although the program lasts 12 months, the feeling I had at the end was that the experience and knowledge I had gained was equal to 2-3 years of working experience..."

Results

For the company, the programme is very successful as all participating engineers in the programme found a job in less than three months and 82% of the participants in the last programme are now employed in the company.¹¹⁶

Source: based on interview and MYTILINEOS Company (2022).

However, more awareness amongst potential trainees is needed since many young people are unaware of opportunities they can take advantage of. The **QFT has also been positive for traineeship providers and companies**, but the lack of subsidies discourages them from investing in traineeships. Awareness raising and change of mentality are also needed so that the benefits of the traineeship are understood by all parties involved. The employers' commitment is necessary to ensure the continuation or employment for young people after the traineeship. In this perspective, extending the duration of the traineeship to 1 or 1.5 years could be beneficial for gaining significant work experience and building a long-term relationship with the employer.¹¹⁷

Of note is that cross-border traineeships are not prevalent in the Greek context and therefore are not addressed here.

5.2 Efficiency

There is no data available about the costs or quantifiable benefits associated with the implementation of the QFT. The costs associated to traineeships and the QFT are mainly funded by the ESF, the State budget and employers' contributions. These costs are mainly related to the compensation of the trainee, which is 80 % of the minimum wage as defined by law each year, currently around **569 EUR** (the minimum wage being approximately 711 EUR). Here, the company covers the cost of the trainee's insurance against a work accident, which is 50 EUR. The same share for the trainee's compensation applies in the tourism sector when the traineeship is subsidised by the ESF and the State budget. Otherwise, the compensation of the trainee is 60% of the minimum wage (currently, around 427 EUR) and it is covered by the tourism company together with the cost of the trainee's

¹¹⁶ <https://www.mytilineos.gr/our-people/engineers-in-action/the-programs-value/>

¹¹⁷ Based on interviews.

insurance against a work accident, which is 50 EUR. The cost of open market traineeships is borne by the company.¹¹⁸

EU funds have contributed to financial incentives for trainees, while training providers and companies have benefited indirectly by investing in trainees' competences - they do not receive subsidies directly to provide traineeships. Large companies can receive a grant from PES under employment and job creation programmes for the unemployed, but it falls under the 'De minimis' rule which limits the possibilities for companies to invest in traineeships.

Nevertheless, traineeships are considered as very important and necessary in Greece. There are **benefits** from the implementation of QFT principles for all parties. For employers, the study identified clear evidence of benefits of the QFT in dealing with skills mismatches (see example in the agri-food sector in the box below). However, these can be maximised through a more targeted approach, an effective follow-up, and employers' commitment to ensure the traineeship leads to a job.¹¹⁹

Using traineeships to deal with skills mismatches in the agri-food sector

The agri-food sector is a particularly dynamic sector, in which there is a recognised lack of modern skills. At the same time, there are unemployed young people who wish to engage in occupations related to agriculture. The goal of the project (2022-2023) is to create a structured path for the entry or re-integration of the unemployed (up to 29 years old) into the labour market, through the development and strengthening of occupational skills in the sector. Potential beneficiaries of the project are the young (up to 29 years old), unemployed who have completed at least secondary education. To achieve this goal, an integrated intervention plan will be implemented which consists of professional counselling, training, certification of professional qualifications and traineeship. The actions of the project are completed with the implementation of a traineeship, which is carried out after a personalised matching of the beneficiaries with businesses in the sector. The ultimate goal of the project is to strengthen the social inclusion of the unemployed as well as the competitiveness of the agri-food sector.¹²⁰ Since the project is in the implementation phase, no results are available so far. It has been selected as a good practice because it adopts the personalised approach in supporting young people to enter the labour market. It also combines professional counselling, training, certification of professional qualifications and traineeship. Furthermore, the intervention has been designed in collaboration with an enterprise, provides long traineeship for 360 hours against 100 hours of theoretical training and chooses the correct timing taking into account seasonality.

5.3 Coherence

The implementation of the QFT is **coherent with national education, training, employment and social policies, but there is no uniform implementation** since different systems of VET with different quality criteria and approaches exist. The quality of each VET system is ensured by different organisations and with different terms. For instance, the quality of apprenticeships is ensured by the Institutes of Vocational Training, the quality of traineeships within continuing vocational programmes is the responsibility of Lifelong Learning Centres and the quality of traineeship for students is under the supervisions of Colleges and Higher Education Institutes. In Greece, traineeships are mainly related to VET programmes and provided for vocational school students. Traineeships are also available in the framework of employment programmes in order to upgrade the skills of the unemployed. Finally, traineeships are provided as part of retraining, specialisation and continuing training of employees. The implementation of QFT is also coherent with EU policies, programmes and financial instruments on education, training, employment and social policies.¹²¹

¹¹⁸ Based on interviews and current legislation.

¹¹⁹ Based on interviews.

¹²⁰ Institute of Small Business of the General Confederation of Professionals Craftsmen and Merchants of Greece, 2022, Institute of Small Business of the General Confederation of Professionals Craftsmen and Merchants of Greece, <https://imegsevee.gr/εργα/agora-ergasias-neous-29-agrodiatroti/>

¹²¹ Based on interviews.

5.4 EU added value

The QFT has clear added value in Greece, as it **provides a basis to build a positive legal framework for young trainees at the national level**. Although there is no available data about quality traineeships, stakeholder views show clearly that trainees and companies have benefited from the QFT. However, Greece must be vigilant and intensify its efforts to ensure quality traineeships and substantial support for young people, particularly through ensuring legislation in place is adequately implemented and enforced.

The QFT **gives more value and seriousness to national policies on quality traineeships**. There is no doubt amongst stakeholders interviewed that the QFT should continue to be implemented at EU level. The main elements and obligations of the QFT should remain in place though a number of additional actions are needed such as guides, good practices, awareness campaigns etc. that can transfer the QFT to active policy and practice. A strategy is also needed to help companies, organisations and trainees see the benefits of quality traineeships.¹²² This means that **the “no policy change” scenario cannot provide adequate solutions**. What is needed is an updated QFT at EU level that takes into account the pace of change in occupations and allows active interaction between the world of work and education.

5.5 Relevance

Interviewed stakeholders believe that the relevance of the QFT to the needs of the target group is high. According to interviewed stakeholders, QFT principles are appropriate for fostering labour market insertion of young people. Representatives of the Ministry of Labour support that QFT principles have been integrated and applied in traineeships in Greece and they still correspond to the needs in the country without requiring any adaptation.

However, stakeholders also stressed the need for a legal framework that applies to open market traineeships, as well as further measures to ensure employment after the traineeship, quality at work, certification of skills. In particular, youth representatives highlighted the need for **better surveillance through effective control mechanisms** to increase the relevance of the QFT in supporting stable labour market integration. Information on opportunities available should also be widely disseminated and with simple and comprehensive messages. Young people are worried and frustrated by the economic crisis. It is therefore important to better manage how QFT principles are communicated through organisations that young people trust.¹²³

According to **trade unions representatives, the QFT principles are relevant but need to be reviewed to regulate in detail the terms for traineeships**. Moreover, QFT needs to be re-examined to include provisions that respond to new needs emerging from the crisis and the pandemic, such as distance education, linking traineeships more clearly to learning objectives and new skills needs of the economy.¹²⁴

For representatives of **large businesses**, QFT principles are appropriate for fostering labour market insertion of young people, but they do not apply across the range of traineeships and, in particular, to open market traineeship that involve a small number of trainees.

Great efforts are currently made in Greece on how the National Mechanism for Labour Market Needs' Diagnosis will contribute to matching skills with labour market needs and the immediate placement of young people in traineeships.

¹²² Based on interviews.

¹²³ Based on interviews.

¹²⁴ Based on interviews.

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Ministerial Decision 79732/27.07.2020 Framework of quality standards for the design and implementation of Continuing Vocational Training (CVT) co-financed by the European Social Fund (ESF) programmes, Ministry of Development and Investment.

Ministerial Decision 82759/Government Gazette B' 4581/30.08.2022. Planning and Management System for the implementation of co-financed/subsidized programmes of non-formal learning, Continuing Vocational Training, and General Adult Education, Ministries of Development and Investment, Education and Religion, Work and Social Affairs

List of interviewed stakeholders

- Ministry of Labour and Social Affairs
- Association of Business and Industry (Stegi SEV)
- Institute of the General Confederation of Labour (INE GSEE)
- Hellenic National Youth Council (ESYN)
- Institute of Small Enterprises of the Hellenic Confederation of Professionals, Craftsmen, and Merchants (IME GSEVEE)

Focus group

For the preparation of the case study the country researcher had some additional interviews with representatives of the Ministry of Labour and Youth Guarantee, large companies as well as with SMEs representatives. During these interviews and some additional contacts, the national expert asked for help in reaching out to young trainees in order to conduct the focus group. However, the answers she got from everyone was that they cannot find their trainees, because they had finished their traineeship in 2016. These traineeships took place during the programming period 2014-2020. Then, there was a gap of 3 years due to the end of the 2014-2020 programming period. The new Regional Development Partnership Agreement 'Human Resources and Social Cohesion 2021-2027' was agreed in June 2022. This explains why it was not possible to organise a focus group for Greece.

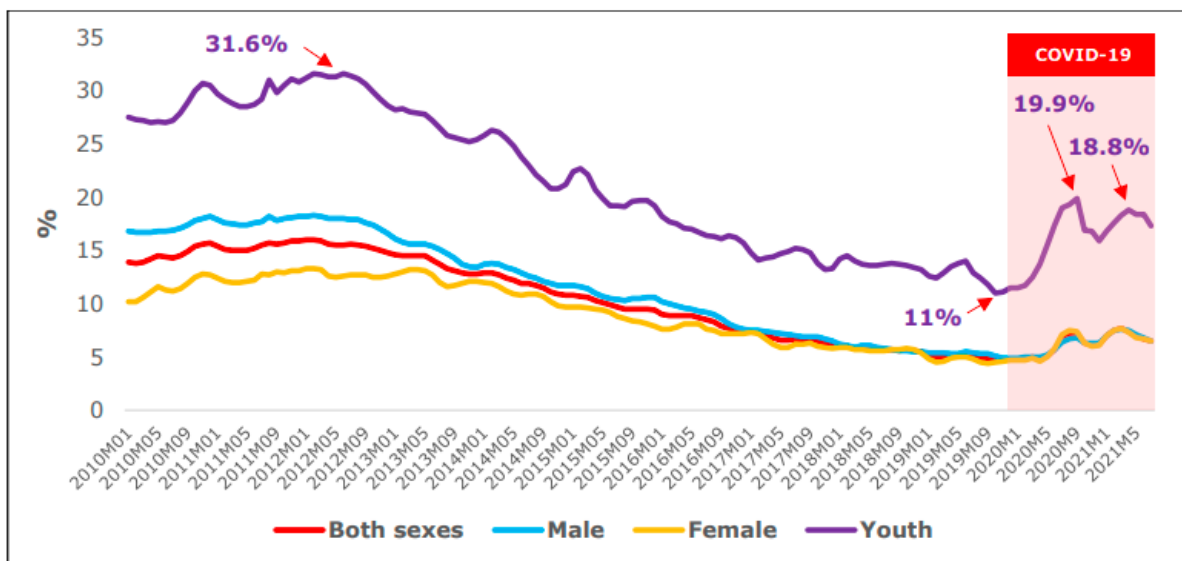
Ireland

1. Overview of the target population and the development of traineeships

1.1. Main trends in youth unemployment and school-to-work transition in Ireland

Before COVID-19 hit, the youth unemployment rate (15-24) in Ireland had been declining, reaching a 10-year low of 11% in 2019. However, the pandemic caused a steep rise in youth unemployment, peaking at 20% in 2020¹²⁵ as shown in Figure 6 below. The Government's Pathways to Work Strategy 2021-2025 made a commitment to reduce the youth unemployment rate back to or below 12.5% - the lowest annual average rate measured in the past decade - by 2023¹²⁶. The latest data, however, indicates a strong recovery in the Irish labour market attributed to the income protection, wage subsidies and "loose macroeconomic policies" applied during the pandemic which helped to mitigate its impact¹²⁷. By May 2022, the youth unemployment rate was down to 5%, significantly below the average EU-27 unemployment rate of 13% at that point¹²⁸.

Figure 6. Monthly unemployment rates in Ireland by sex/group, January 2010-July 2021



Source: Lawlor, 2021.

1.2 The prevalence of traineeships in Ireland

Enrollment in traineeships has been declining since 2014. This due to the fact that traineeships traditionally primarily targeted the unemployed: with the unemployment rate significantly decreasing over the past decade, there have been shortfalls in trainee enrolments against annual targets. However, forecasts from the Education and Training Boards (ETBs) indicate that **ALMP traineeship enrolments are set to rise again**¹²⁹, thanks to the introduction of new traineeship programmes and

¹²⁵ Lawlor, 2021.

¹²⁶ <https://www.gov.ie/en/publication/1feaf-pathways-to-work-2021/>

¹²⁷ McDonnell, 2022.

¹²⁸ Houses of the Oireachtas, 2022.

¹²⁹ SOLAS, 2018.

the expansion of eligibility requirements for ALMP trainees to include a broader range of participants, including school leavers; older learners; those in employment and the unemployed.

Since ALMP traineeships were first introduced in Ireland in the mid-1990s there has been an estimated 30,000 trainees and over 1,500 participating employers¹³⁰. The “Action Plan to Expand Apprenticeship and Traineeship in Ireland 2016- 2020” projected that there would be 5,000 annual enrolments on ALMP traineeship programmes, and 54 programmes available across a range of sectors by 2020, with a cumulative total of 19,000 enrolments on traineeship programmes between 2016-2020 being projected,¹³¹ through a combination of 14,800 trainee enrolments on existing programmes and an additional 4,200 enrolments on programmes to be developed in the period¹³². Over 75 traineeship programmes, across 13 broad industry areas¹³³ are currently available in Ireland, with new programmes being developed on an ongoing basis by ETBs in response to identified skill needs¹³⁴.

Table 1 below shows foreseen targets for traineeship provision and enrolments in the period 2016-2020, while Table 2 provides an overview of actual enrolments between 2016-2018.

Table 1. Targets on traineeship provision and enrolment under the Action Plan to Expand Apprenticeships and Traineeships in Ireland 2016-2020

	2016	2017	2018	2019	2020
Number of live traineeship programmes	24	24	24	24	24
Target for new enrolment per annum	2,400	2,400	3,000	3,500	3,500
Number of traineeships (cumulative)	2	4	10	20	30
Target new enrolment per annum	100	200	900	1,500	1,500

Source: SOLAS, 2019.

Table 2. Traineeship enrolments 2014-2018

	2014	2015	2016	2017	2018
Traineeship enrolment per annum	2,708	2,350	2,321	1,770	2,597

Source: SOLAS FARR Database cited in Houses of the Oireachtas, 2019.

Furthermore, the Irish Government’s ‘Pathways to Work 2021-2025’ strategy document includes commitments for the Irish Public Employment Service (PES), Intreo, to deliver a new paid Work Placement Experience Programme (WPEP) and support 10,000 unemployed people (including 4,000 young people)¹³⁵ with the opportunity to build on-the-job experience. The WPEP programme began in 2021 and targets jobseekers wanting work experience. The strong economic recovery in Ireland, however, has meant that the need for the WPEP has been less than anticipated, as many employers are facing staff shortages and are trying to recruit. The number of WPEP placements approved as of 24 June 2022 was 365¹³⁶. Of these placements some 203 participants had ended their WPEP experience¹³⁷.

There is **much less evidence about the prevalence of open market traineeships (OMT) in Ireland**. While OMTs exist, there is no available estimate of their number as relevant research is lacking.¹³⁸ However, a 2018 survey found that 80% of employers surveyed had offered traineeships

¹³⁰ SOLAS, 2019.

¹³¹ Department of Education and Skills, 2016.

¹³² Department of Education and Skills, 2016.

¹³³ In Business; Care; Construction; Engineering; Fashion & Beauty; Finance; Hospitality; ICT; Logistics; Manufacturing; Media; etc.

¹³⁴ Houses of the Oireachtas, 2019.

¹³⁵ For jobseekers (aged 18 -65) in receipt of a qualifying social welfare payment and who have been unemployed for 6 months or more.

¹³⁶ Houses of the Oireachtas, 2022.

¹³⁷ 122 had completed the full course and an additional 81 finished WPEP early due to a variety of reasons, including 30 who had obtained employment (Houses of the Oireachtas, 2022).

¹³⁸ Houses of the Oireachtas, 2022.

for graduates (95% of these paid) which suggests OMTs are well established in the graduate market¹³⁹. Moreover, the trade union movement has argued that OMTs have replaced many traditional entry routes in the Irish labour market¹⁴⁰. Research shows that, on average, traineeships in Ireland are six months or longer in duration¹⁴¹. A limited number of paid traineeships are also currently operated by Government Departments, with some of them reserved for individuals from underrepresented groups including Travellers and people with disabilities¹⁴²¹⁴³. Traineeships in law, media, publishing, advertising and the creative industries are also commonplace and they have also become an important part of the start-up environment, particularly in knowledge-based industries such as technology and business services¹⁴⁴.

Lastly, and in addition to the current lack of data on the prevalence of OMTs, another issue is that there is **no comprehensive legal definition of traineeships**¹⁴⁵ in Ireland.

2. National and regional legislation and policies relevant to quality traineeships

The national traineeship programme was introduced in 1995 by the training and employment agency FÁS, supported by the EU Operational Programme for Human Development, and then by the Programme for Employability, Inclusion and Learning 2014-2020¹⁴⁶.

As opposed to apprenticeships, traineeships are not governed directly by legislation.

However, there are a number of legislative acts that encompass all types of education and training. For example, the Qualifications and Quality Assurance (Education and Training) Act 2012, underpins all education and training provision nationally¹⁴⁷. This Act also established Quality and Qualifications Ireland (QQI) as a new agency providing quality assurance oversight of education and training providers.¹⁴⁸ In 2013, moreover, the Further Education and Training Act 2013 became law and provided for the dissolution of FÁS and the establishment of a new authority, SOLAS, the Further Education and Training Authority, under the Department of Education and Skills. Under this Act, the existing FÁS training centre network and training provision responsibilities were transferred to 16 Education and Training Boards (ETBs).

ALMP traineeships in Ireland are now offered primarily through the ETBs, in partnership with employers. In 2014 SOLAS developed the “Further Education and Training Strategy 2014-2019”, recognising the importance of traineeships,¹⁴⁹ and addressing the importance of matching further education and training (FET) provision to employer needs and of forging strong partnerships between employers, employees, trade unions and traineeship providers and building linkages between the world of work and traineeship providers¹⁵⁰. In addition, the Strategy established a new integrated FET planning model to ensure that employment-led provisions such as traineeships would be informed directly by employers and reflect labour market challenges¹⁵¹.

Since 2016, there have been further policy efforts to promote work-based learning and ALMP traineeships. These include the Government’s National Skills Strategy 2025 and ‘The Action Plan to Expand Apprenticeship and Traineeship in Ireland 2016- 2020’, both of which included actions and ambitious annual targets for traineeship provision, reiterating the intention to invest in

¹³⁹ GradIreland [Online] What is an internship?

¹⁴⁰ Murphy, 2015.

¹⁴¹ GradIreland [Online] What is an internship?

¹⁴² Houses of the Oireachtas, 2022.

¹⁴³ Houses of the Oireachtas, 2021.

¹⁴⁴ McCannFitzGerald, 2021.

¹⁴⁵ Houses of the Oireachtas, 2022.

¹⁴⁶ SOLAS, 2019.

¹⁴⁷ SOLAS, 2019.

¹⁴⁸ SOLAS, 2014.

¹⁴⁹ ICF, 2018.

¹⁵⁰ ICF, 2018, p 76.

¹⁵¹ SOLAS, 2014.

apprenticeships and traineeships as modes of learning and skills development to significantly grow work-based learning¹⁵². The implementation of the 'Action Plan' has been underway since January 2017 with actions including providing additional traineeship opportunities through the Career Traineeship (CT) pilot initiative; reviews of pre-2016 and post-2016 traineeship provision; and the establishment of a Traineeship Steering Group to lead the development and rollout of traineeships. In November 2017, the Government announced that it had allocated an additional EUR 15 million for traineeship training, an increase of almost 58% from the previous year¹⁵³.

Specific legislation regulating OMTs does not exist in Ireland. However, trainees should be protected under general labour law, and the recently reformed National Minimum Wage (NMW) Act, 2000 in particular (see section 2.1). From 2019, trainee-specific pay rates under the NMW Act were abolished. Pay rates for employees are now based on age through the implementation of the Employment (Miscellaneous Provisions) Act 2018, No. 38 of 2018. Ireland now includes trainees in its NMW legislation, irrespective of whether a written contract of employment exists or whether the engagement is described as a traineeship¹⁵⁴. By law, any individual agreement with another person to do or to perform any work or service is considered an employment contract. Therefore, NMW rates apply to work experience placements, work trials, and traineeships¹⁵⁵.

3. Stakeholder views on traineeships

IBEC, the largest business representative group in Ireland, alongside other key stakeholders¹⁵⁶, view **employer buy-in as critical to the uptake of ALMP traineeships**. According to IBEC, the following steps are necessary to foster employer's buy-in:¹⁵⁷

- Encouraging employers to engage with local actors on the development of traineeships through regional promotional campaigns.
- Developing career pathways between traineeships and other programmes to highlight progression opportunities and encourage lifelong learning.
- Ensuring traineeships become an avenue to support and reskill people returning to the workforce after a period of absence through the social welfare system.

Traineeships have not featured on the trade union agenda in Ireland in recent years, particularly since the closure of the controversial JobBridge scheme of which the trade unions were highly critical. There was no trade union involvement in the design and implementation of JobBridge and, similarly, the trade unions have not been involved in the new WPEP. The Irish Congress of Trade Unions (ICTU), however, emphasised that, in the future, trade unions should take up a greater role in the development and delivery of ALMP traineeships in Ireland¹⁵⁸.

Lastly, social partners have emphasised the **caution still required in unregulated OMTs**. Whilst the number of unpaid traineeships is falling and structured quality traineeship programmes are offered, particularly by large employers¹⁵⁹, the lack of regulation of OMTs means **low quality placements are still an issue**.

¹⁵² ICF, 2018.

¹⁵³ Cedefop, 2018.

¹⁵⁴ Houses of the Oireachtas, 2022.

¹⁵⁵ Workplace Relations Commission (Online) Unpaid Work.

¹⁵⁶ such as government and the ETBs, as stated in Houses of the Oireachtas, 2018.

¹⁵⁷ Houses of the Oireachtas, 2019.

¹⁵⁸ Based on an interview with a Trade Union Stakeholder.

¹⁵⁹ Irish Times, 2018.

4. Actions taken in response to the QFT

Ireland has been embarking on a new phase of development of traineeships¹⁶⁰. In 2017, there was recognition by SOLAS that there had been some drift away from the pre-2016 Traineeship model with considerable variation in terms of its application¹⁶¹¹⁶². In addition, it was observed that the **existing traineeship model in Ireland did not fully match the key features of quality traineeships** as identified at the international and European level, including by the European Commission through the QFT, particularly with regards to actively engaging employers, providing structured learning, and putting a spotlight on written agreements¹⁶³¹⁶⁴.

To respond to these gaps, Ireland has adopted consecutive traineeship models and frameworks that are better aligned with the QFT principles:

- The **Career Traineeship (CT) model** was piloted in 2017 and included the following features: specified learning and training objectives; clear working conditions; clear rights and obligations; reasonable duration; validation of knowledge, skills and competences¹⁶⁵; and a written traineeship agreement. In addition, workplace supervision and effective monitoring (considered as a distinct function to workplace supervision) were provided for under this model. The CTs were piloted in industry sectors and occupations where demand for labour and skills had been identified,¹⁶⁶ and with a specific focus on nationally and locally identified needs¹⁶⁷. The CT model, however, was closed in 2017 as it was deemed too complex.
- The **Five Step Guide to Traineeship**¹⁶⁸ in 2019. While this new framework further clarified the key features of traineeships, it still did not align fully with the QFT¹⁶⁹. For example, under this framework the foreseen duration of traineeships is between 6 to 20 months (in practice, however, very few traineeships extend beyond a 6-9-month duration¹⁷⁰).
- In 2021, the Government established the new **Work Placement Experience Programme (WPEP)**, which is based on a set of operational guidelines which better align with QFT principles (see Figure below). The Department of Social Protection, with the QQI and ETBs have also developed a specific WPEP Accredited Work Experience Module for participants to demonstrate that they have gained the relevant knowledge, skill, and competence to work in a range of organisations.¹⁷¹

Work Placement Experience Programme – Operational Guidelines

Operational guidelines for work-based learning opportunities, including traineeships, under the WPEP programme:

- Hosts and participants should sign a written agreement ("Joint Application Form").
- The foreseen duration of individual placements is 6 months (i.g., 30 hours per week);
- The foreseen weekly pay rate is EUR 311 and hosts must not pay top-up contributions to participants;

¹⁶⁰ Houses of the Oireachtas, 2018.

¹⁶¹ All ETB-led programmes are monitored centrally [by SOLAS] but managed locally by each ETB.

¹⁶² SOLAS, 2018.

¹⁶³ SOLAS, 2018.

¹⁶⁴ ICF, 2018.

¹⁶⁵ ICF, 2018.

¹⁶⁶ Hospitality, Engineering and Digital Sales and Marketing were identified as areas with requirements for labour and skills

¹⁶⁷ Houses of the Oireachtas, 2019.

¹⁶⁸ Based on an interview with a Government stakeholder.

¹⁶⁹ Based on interviews.

¹⁷⁰ Based on an interview with a Government stakeholder.

¹⁷¹ Dept. of Social Protection, 2022.

- Participants can complete a maximum of two placements, for a total 52 weeks. However these placements cannot be with the same host and extensions to placements are not permitted¹⁷²;
- Participants are expected to complete at least 60 hours of training while on the placement, 20 of which should be accredited or sector recognised training¹⁷³;
- Hosts are required to complete a monthly compliance checklist over to ensure their placements are in line with programme guidelines, including through ensuring that an assigned mentor meets with the participant weekly to provide feedback and monitor progress.
- Source: WPEP Operational guidelines, 2021¹⁷⁴

Whilst the QFT has not led directly to legislative changes in relation to open market traineeships, it has influenced the policy debate around traineeships in Ireland. For example, interviewed SOLAS representatives confirmed that the 'Action Plan to Expand Apprenticeships and Traineeships 2016-2020' acknowledged the importance of quality traineeships and that the QFT had contributed to this debate. Moreover, the 'Action Plan' explicitly states that the development of the 'Career Traineeships' was "in response to a Europe-wide Quality Framework for Traineeships, introduced by the European Commission"¹⁷⁵. Furthermore, the quality standards set out in the QFT were considered in the development of the 'Five Step Guide to Traineeship in Ireland' (see section 2.1).

The table below includes practical examples of QFT implementation that enhance or hinder trainees' school to work transition.

Table 3. Examples of traineeship programmes that enhance or hinder trainees' school to work transition

Practice	Description
JobBridge	<p>JobBridge consisted of 5,000 state-funded traineeships, lasting 6 to 9 months, in the private, public, and voluntary sectors¹⁷⁶. Despite the fact that the QFT had been taken into account as a guidance document for the implementation of JobBridge, as stated by the Irish Minister for Employment,¹⁷⁷ the scheme was closed following both the significant decline in unemployment since the scheme's introduction in 2011 and the outcome of an evaluation of the programme which recommended the scheme be replaced by a new activation measure.</p> <p>Throughout its implementation, JobBridge had been a controversial scheme and was highly criticised by trade unions due to reports of exploitation, with the Department of Social Protection reportedly investigating 200 companies for allegedly abusing the scheme¹⁷⁸. JobBridge's monitoring system was also criticised, with concerns that the scheme had led to displacement in some instances (i.e., loss of jobs in other companies due to the competitive advantage given to those participating in the scheme)¹⁷⁹ and misuse of traineeships as employers replaced paid staff with unpaid trainees.¹⁸⁰</p>

172 WPEP operational guidelines includes information on early finishing of the placement - an early finisher form must be completed.

173 Sector recognised training delivers the specific competencies needed within a sector or occupation.

174 <https://www.gov.ie/en/publication/98f23-operational-guidelines-work-placement-experience-programme/>

175 Department of Education and Skills, 2016.

176 Arlow, 2022.

177 Houses of the Oireachtas, 2017.

178 O'Dwyer, 2016.

179 For example, one Dublin based mechanics advertised for 28 internships during the lifetime of the scheme, equivalent to saving EUR 273,308 in labour costs at minimum wage pay rates (cited in Arlow, 2022).

180 Arlow, 2022.

Carrer Traineeship (CT) model	<p>The CT model sought to “build on national and international best practice in work-based learning initiatives for job seekers, with a model of training provision that was employer-led and directly responsive to skills demand in the local and national economy”¹⁸¹.</p> <p>Out of the four core pillars of the CT model (Needs Identification, Employer Partnership, Collaborative Programme Development and Integration of Directed and Work- Based Learning), employer partnerships were described as the key factor determining its successful delivery¹⁸².</p> <p>A 2018 evaluation of the CT pilot programmes found that the model had been “effective and efficient in the design, development and delivery of training targeted at identified labour market skills needs”, including through the use of indicators such as completion rates and employment and skills outcomes of traineeships. Some of the main achievements included the following:</p> <ul style="list-style-type: none"> • 94% of the 164 trainees who had completed the programmes were employed after their traineeship ended; • Employers praised the commitment, skills, and job-readiness of the trainees on completion¹⁸³; • The CT model offered “an opportunity to enhance knowledge, skills, and competence, to gain tangible work experience and proficiency in applying those skills and capabilities in real work settings, and access to employment as well as recognised qualifications to support future career ambitions”¹⁸⁴. <p>The evaluation, however, also identified some challenges which ultimately led to the closing of the programme. These included the significant time, resources and investment required to develop, deliver, and complete the pilots, the substantial role of the ETBs in monitoring and managing the programme, and the need for a more systematic and formal approach to employers offering financial compensation to respond to inconsistencies across sectors or CTs¹⁸⁵.</p>
Combilift	<p>Combilift has been offering a full-time traineeships in Original Equipment Manufacturing (OEM). While numbers have been decreasing in recent years¹⁸⁶ due to the increased availability of traineeship programmes increasing the competition for quality candidates, typically, a maximum of 20 trainees enrol on the course each year.</p> <p>Trainees complete 26 weeks' classroom-based learning and a 12 weeks' work placement in Combilift over the course of 9 months. Trainees who successfully complete the programme receive a Level 5 QQI Certificate in Engineering Technology and may either apply for employment at Combilift (80% of trainees are offered employment)¹⁸⁷; apply for an apprenticeship or enter further studies. The programme benefits trainees as it helps fast-track careers, and supports trainees to identify quickly through tasks they enjoy through with rotations across different work areas¹⁸⁸.</p>

181 ICF, 2018.

182 “The pilot Career Traineeship project was made possible by the establishment of partnerships with employers, employer representative bodies, ETBs, and SOLAS. Communication structures and processes were established to ensure employer involvement in the scoping, design, development, and provision of WBL opportunities for learners. Pilot CT programmes were closely monitored throughout the initial implementation and roll-out to inform continuous improvement and development of the model” (ICF, 2018, p. 22).

183 ICF, 2018, p. 34

184 ICF, 2018, p. 4

185 ICF, 2018.

186 In 2021, 15 trainees enrolled on the course and 13 finished [Employer Stakeholder interview].

187 Based on Employer Stakeholder interview.

188 The course is fully funded by the European Support Fund and a training allowance is paid to those in receipt of a Social Welfare Payment, with a bursary [EUR 100 a week] provided by Combilift to those not in receipt of a training allowance. Trainees are assigned a mentor for the duration of the course.

5. Key evaluation findings

5.1. Effectiveness

No legislative changes have been made in response to the Council Recommendation for a QFT. Despite the lack of legislative instruments implementing the QFT principles, contractual frameworks and operational guidelines for ALMP programmes reflect, at least in part, the QFT. According to national authorities interviewed, however, **several obstacles remain, particularly regarding the written agreement that should underpin traineeships.** These stakeholders highlight that, signing a traineeship programme agreement is mandatory, enforcing its provisions can become difficult for the ETB coordinators, due to resource constraints and also an unwillingness to risk relationships with important employers and jeopardising trainees' chances or the traineeship programme more generally. Moreover, the lack of a standardised approach to written agreements seems to represent an additional obstacle. Not only is there currently no consistent, standard written agreement model to be used by all ETBs across all traineeships, but national authorities stated that *"it would be very difficult with all the different ETBs and traineeships and different employers to have a written agreement to be used across the board"*.

Moreover, there is currently no legal definition of 'trainee' in Irish law. While there is no explicit link to the QFT, the "National Minimum Wage (Payment of Interns) Bill 2022" recently proposed by the Irish Labour Party includes provision that would ban unpaid traineeships in Ireland. The Bill proposes a comprehensive definition of an "trainee" as a person working more than 30 hours per week within a period of four or more weeks and who may not necessarily have a contract of employment.¹⁸⁹

In terms of monitoring traineeship quality, the approach differs depending on the type of traineeships (i.e., ALMP traineeships and OMTs). Currently, **no formal mechanism of enforcement or regular monitoring process exists for OMTs** except for investigations carried out by the Labour Inspectorate. Conversely, however, **ALMP traineeships are monitored centrally by SOLAS** and there are Strategic Performance Agreements (SPAs) between SOLAS and the 16 ETBs which set out priorities and ETBs contribution to the achievement of national FET targets, which provides a way to monitor ETB delivery of traineeship¹⁹⁰. The ETBs are also now subject to external QQI quality assurance reviews. Furthermore, training programmes offered to young people under the Youth Guarantee scheme are subject to regular review at national and local level to ensure continual improvement in their relevance to the needs of trainees and of local labour markets¹⁹¹.

Consulted national authorities reported that the new model of traineeship in Ireland has had a **positive impact on trainees**, fostering positive outcomes such as "higher levels of confidence; more inclinations to progress onto other types of education; good employment outcomes; and higher transversal skills". Similarly, periodic reviews of the outcomes of work-based programmes have shown the "consistently strong employment outcomes from traineeships"¹⁹². Views expressed by trainees participating in the focus group also supported these findings, with all participants reporting very positive impacts and experiences from their participation in traineeships, confirming that these are seen as a key step to enter the labour market. Examples of the positive impact of traineeships included:

- **Higher employability**, with trainees receiving job offers upon completing their traineeship;
- **Increased self-confidence**, including for those re-entering the labour market following a period of absence. To this end, the role of mentors was highlighted as a key success factor;

¹⁸⁹ Senator Marie Sherlock, in reference to the Bill, stated "It is what we see as a long overdue step to ban what are called OMT. It would follow the example of the UK, France, Australia, and other countries that have legislation in place to tightly regulate and restrict unpaid internships. What we are proposing follows on from the call of the European Parliament in 2020 when it passed a motion calling for a ban on unpaid internships across all EU member states (Houses of the Oireachtas, 2022).

¹⁹⁰ Based on Government stakeholder interview.

¹⁹¹ European Commission, 2018.

¹⁹² SOLAS, 2019.

- **Renewed interest/passion in specific sectors/professions** with traineeships providing a pathway into these areas of work.

In terms of potentially **adverse impacts of traineeships**, one of the main issues highlighted was the need to ensure that the learning content is regularly updated to adapt to fast moving industries, with a focus group participant commenting that “after entering the workforce following the traineeship, I found the sector had moved ahead”.

Lastly, **Ireland has made efforts to the active involvement of employers** in traineeships. The ‘Action Plan to Expand Apprenticeships and Traineeships 2016-2020’ included commitments to refresh and relaunch traineeship programmes in close partnership with employers. Moreover, under the subsequent Career Traineeship model, effective employer partnerships were seen as “a critical dimension of the CT concept and ongoing determinant of its effective delivery”¹⁹³. The key features of effective employer partnerships were identified as including:

- Collaborative engagement of employers through all phases of traineeship design, development and delivery;
- Ongoing communication and liaison with employers and between all partners;
- Promoting buy-in and commitment, including through the joint identification of skills needs¹⁹⁴.

5.2. Efficiency

In Ireland, both the state budget and EU funding support the implementation of traineeship programmes. For example, the ETB-led traineeship programme in Ireland is co-funded by the Irish Government and the European Social Fund (ESF) as part of the ESF Programmes for Employability, Inclusion and Learning 2014-2020.

Quantitative data on costs associated with the design and implementation of quality traineeships is largely lacking. Evidence gathered through the study, however, revealed that:

- The **reported expenditure for traineeship training in 2020** was EUR 30.988,493, with 3.554 beneficiaries and an average stated cost per beneficiary of EUR 8.719¹⁹⁵ over the year. In addition, the net cost of the WPEP programme over 2020/21 was initially estimated at EUR 30 million with up to 10.000 participants¹⁹⁶, with an average estimated cost per participant of EUR 3.000.
- Anecdotal evidence from the stakeholder interviews shows that the main acknowledged costs were linked to the **increased administrative costs** that accompany higher levels of quality assurance and compliance with contractual frameworks. According to an employer representative: “*There is a huge administrative burden on all employers: the reporting; assessments; training plans; documentation; training specifications; supervision - it is very prohibitive if the employer does not have the skills internally*”.
- **Ireland does not currently offer any financial incentive to employers** to increase their engagement in traineeships.

Furthermore, **several specific obstacles** and/or concerns have been identified in establishing and maintaining ALMP traineeships through partnerships between the ETBs and employers. These include the following:

¹⁹³ ICF, 2018.

¹⁹⁴ ICF, 2018.

¹⁹⁵ Houses of the Oireachtas, 2021.

¹⁹⁶ Labour Market Advisory Council, 2020.

- Effective employer partnerships are resource intensive and employers often underestimate the work involved in the new model of traineeship¹⁹⁷;
- Employers tend to be “uninformed, wary or risk-averse, and difficult to persuade or keep committed”¹⁹⁸;
- Supervising trainees over an extended period of time may reduce efficiency¹⁹⁹;
- The impact of the COVID-19 and the uncertainty that followed consecutive lockdown has affected employers’ willingness to offer traineeships²⁰⁰;
- Excessive paperwork and administrative burden connected to traineeship delivery have dampened employers’ enthusiasm²⁰¹.

Furthermore, the research has highlighted **specific obstacles faced by micro, small and medium employers**:

- Less time, as well as financial and human resources to invest in traineeships;
- Insufficient space or IT infrastructure to physically accommodate trainees²⁰²;
- Less opportunities to hire trainees when their traineeship is completed, as opposed to larger companies²⁰³;
- Less human resources to dedicate to mentoring²⁰⁴;
- Lower level of knowledge of the education and training system, which would be necessary engage with traineeships²⁰⁵;

For what concerns the **benefits of traineeships**, concerns remain around the low quality of OMTs, which can affect trainees’ employment outcomes. In general, however, more **structured graduate traineeship programmes are considered to lead to positive employment outcomes**, with a survey finding that up to 50% of graduate recruitment intake comes from those who did an internship with the company that offered the traineeship programme in the first place²⁰⁶.

Furthermore, a **wide range of benefits are associated with ALMP traineeships**, depending on the stakeholder group, as shown in the Table below.

Table 4. Benefits of traineeships for trainees and employers

Trainees	Employers
<ul style="list-style-type: none"> • Smoother school-to-work transitions, with periodic surveys of traineeship participants indicating that up to 60% obtained employment within 12 months²⁰⁷; • Quality traineeships can serve as a ‘steppingstone between shorter training 	<ul style="list-style-type: none"> • Quality traineeships can build a pipeline of employees, with the opportunity to assess the abilities of potential employees without significant financial risk on the part of the employer²¹².

197 SOLAS, 2018. The time investment was also highlighted in an employer stakeholder interview.

198 ICF 2018, p. 31

199 SOLAS, 2018. This view was reiterated in an employer stakeholder interview.

200 Based on Government Stakeholder interview.

201 ICF 2018, p. 32.

202 ICF 2018, p. 32.

203 ICF 2018, p. 31

204 Trainee supervision and teaching is costly and disruptive on the factory floor prior to it generating any business benefits (ICF 2018, p. 34)

205 Based on Employer representative interview.

206 Cited in Irish Times, 2018

207 Houses of the Oireachtas, 2019.

212 SOLAS, 2017.

<p>courses, apprenticeships and three-to-four-year degree programmes²⁰⁸;</p> <ul style="list-style-type: none"> • Working with a supervisor/mentor is important for career progression, as it allows trainees to be better prepared to choose future career directions after the traineeship²⁰⁹; • Better involvement of vulnerable groups through increased flexibility in the post-2016 programmes which foresee flexible delivery; eg. online and face to face learning²¹⁰; • Opportunity to develop strong transversal skills, as these are now built into the post 2016 programmes²¹¹ 	<ul style="list-style-type: none"> • Engagement in traineeships can enhance the skills of existing staff (e.g. through mentoring)^{213,214}. • Employers often value the regional links through the ETBs, the accessibility of a nearby education and training partner(s) and the ability of educators to be responsive to emerging skills needs and provide expertise in programme development, design²¹⁵, and, delivery of classroom-based learning²¹⁶. • Increased employability due to the production of relevant skills tailored to employment needs²¹⁷ and the limited durations of traineeships enabling participants to join the workforce more quickly.²¹⁸ Following the Career Traineeships pilot, employers welcomed the commitment, skills, and job-readiness of trainees upon completion and commented on the cost savings this represented; the lack of any learning curve, their immediate productivity, and the fact that core competencies were in place prior to employment²¹⁹.
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Source: Ecorys 2022

5.3. Coherence

Overall, there is a good level of coherence between national traineeship policies and the Council Recommendation for a QFT. Over the years, progress has been made in reconfiguring FET²²⁰ and new ALMP traineeship models and work-based learning programmes have been developed, which show a higher degree of alignment with the QFT. More specifically, current ALMP programmes typically include some form of written agreement (albeit not standardised across traineeship programmes); workplace supervision/mentorship; specified learning and training objectives; clear working conditions; transparent rights and obligations; and validation of knowledge, skills, and competences acquired. The newest ALMP programme in Ireland – the WPEP – demonstrates the greatest level of coherence between the QFT and the key requirements of the programme.

Furthermore, **the QFT also complements broader national policy instruments**, including the Pathways to Work Strategy 2016 – 2020²²¹ and the National Skills Strategy 2025 – Ireland's Future²²². The latter places a focus on providing skills development opportunities; a constant improvement and monitoring of learning quality; encouraging more people across Ireland to engage in lifelong learning; support to increase the supply of skills to the labour market; and a focus on active

208 Based on Employer representative interview.

209 SOLAS, 2018.

210 SOLAS, 2018.

211 SOLAS 2020.

213 Department of Education and Skills, 2016.

214 e.g. training for workplace supervisors is to enable them to support on-the-job learning under the new post 2016 programmes.

Positive feedback has been received on this and highlights that the benefits for employers are not necessarily monetary (Houses of the Oireachtas, 2018).

215 Department of Education and Skills, 2016.

216 Based on Employer representative interview.

217 SOLAS, 2018.

218 Houses of the Oireachtas (2019) Report on Hearings Relating to the Uptake of Apprenticeships and Traineeships, Houses of the Oireachtas Joint Committee on Education and Skills, September 2019

219 ICF, 2018.

220 Department of Further and Higher Education, Research, Innovation and Science, 2021.

221 <https://www.gov.ie/ga/foilsuichan/5b410e-pathways-to-work-2016/>

222 <https://www.gov.ie/en/publication/69fd2-irelands-national-skills-strategy-2025-irelands-future/>

inclusion to support participation in education and training and the labour market²²³. This is particularly important as the scope of traineeships has been expanded to include not only the unemployed and young people but also older workers and those who are changing sectors or returning to the labour market .

5.4. EU added value

The most significant added value of the Council Recommendation for a QFT has been **defining quality traineeships, and, in turn, highlighting existing gaps and shortcoming within traineeship programmes and practices in Ireland**. The QFT prompted and accelerated the process that led to the establishment of the new traineeship model in Ireland.

Consulted stakeholders supported this view, with one government representative stating that “the QFT got us to the national framework [for traineeship] more quickly. It gave us a foundation to build on and accelerated where we wanted to go with traineeship. Having an EU framework underpinning what you are doing provides a level of confidence and trust and facilitated us to get where we are with traineeship. It would have been harder for us to come up with the framework without the QFT being in place”²²⁴. Moreover, another government stakeholder observed that **incorporating the QFT principles into the design of programmes at the national level and ensuring that these comply with EU-wide standards, provides added value as it can encourage trainee mobility**.

Stakeholders, particularly within national authorities, believe that **discontinuing the QFT at EU level would have limited impact as the current Irish traineeship model is seen to be largely compliant with the QFT**, practices are now well established and the Irish Government would continue to ensure quality ALMP programmes were being delivered. While stakeholders highlighted that there is now less of a pressing need for common quality standards, they stated that there is still a key role to be played by the EU in this area, as **the European Commission should continue to promote mutual learning between Member States**.

5.5. Relevance

The government stakeholders interviewed agreed that the **QFT principles are appropriate in fostering a stable labour market insertion of young people**. By complying with the quality principles set in the QFT, ALMP traineeships offer quality opportunities to young people, which, in turn, can result in their increased employability. This is seen as particularly relevant for marginalised youth, as often it is young people who are the most vulnerable and distant from the labour market that take up ALMP traineeships. However, concerns were raised by interviewed youth representatives with regards to the extent to which the QFT and quality traineeships are relevant to avoid misuses, as an ongoing concern remains that “young people end up in a merry-go-around of traineeship and still never really progress to longer-term employment”.

Interviewed stakeholders (ETB and youth representatives) highlighted that **ensuring transparency with regards to the conditions of traineeship opportunities is also particularly relevant to support youth in entering the labour market**. Transparency is seen as particularly crucial in relation to compensation and learning outcomes: this relates not only to any potential remuneration provided as part of the traineeship experience, but also to earning potential in the labour market following the completion of the traineeship. As highlighted by an interviewed youth representative, there is a need to “encourage young people to accept what might be a delayed benefit in enrolling in a quality programme e.g. it would be worth doing a traineeship for 6 months in order to get a better outcome [in the long run]”.

The COVID-19 pandemic has had an impact on traineeships in Ireland. Under the national traineeship model, traineeships must have a minimum of 30% on-the-job learning. **COVID-19 and**

223 Department of Further and Higher Education, Research, Innovation and Science, 2021.

224 Based on Government stakeholder interview.

consequent lockdowns encouraged innovation to fulfil traineeship requirements:²²⁵ Some traineeship providers modified arrangements where work placements could not be completed due to the pandemic, such as moving to online courses (half of the focus group participants had experienced a shift to online learning necessitated by the pandemic), alternative assessments or demonstrating learning outcomes through recognition of prior learning (RPL) from previous work experience. Despite these innovative approaches, challenges remained, including **deferral of placements** being a common occurrence during the pandemic, as well as **lack of access to specialist equipment** or facilities due to remote working. While lockdown measures are not in place anymore, the backlog of deferred work experience placements, also poses a concern – particularly for traineeships which have large workplace components²²⁶.

According to stakeholders consulted, and to national authorities in particular, an additional dimension that could be included in the QFT to increase its relevance, is around ensuring there is flexibility built into traineeship delivery. **The pandemic has shown the need to foresee flexible learning arrangements and consider the impact of the digital transformation on traineeships.** These stakeholders mentioned that accessibility would increase if traineeships became more flexible and included online learning, where possible. An interviewed employer representative supported this view and commented that many companies may welcome a more flexible and hybrid approach to traineeship delivery as digital learning has the potential to reduce training costs.²²⁷ In addition, a more hybrid approach to traineeship could benefit learners as it would remove distances, allowing trainees to engage in traineeships being offered outside of their region²²⁸. **While flexibility could increase traineeships' relevance, remote or hybrid work also presents several risks**, including reduced social interaction. These were highlighted by trainees participating in the focus group who stated that they valued the social interactions with other trainees, as well as face-to-face learning from other colleagues. Moreover, they also questioned the suitability of digital learning to suit the individual learning styles of different trainees.

²²⁵ QQI, 2020.

²²⁶ QQI, 2020.

²²⁷ For example, associated training costs such as the travel, accommodation or meal allowances often paid to trainees.

²²⁸ Based on Employer representative stakeholder interview.

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List of interviewed stakeholders

- Department of Social Protection, Youth Guarantee Coordinator
- SOLAS [SOLAS are the FET authority for Ireland], Research, Data and Strategic Engagement Department

- Education and Training Boards Ireland, Work-Based Learning [Further Education and Training] Department
- Enterprise Ireland, Strategic Policy Department
- Youth Work Ireland Youth, Advocacy and Policy Department
- Irish Congress of Trade Unions, Social Policy Department
- Combilift Ltd – delivers Original Equipment Manufacturing (OEM) Engineering Traineeship, Human Resources
- Chambers Ireland, Network Manager

Focus group participants

Focus group participants wished to remain anonymous.

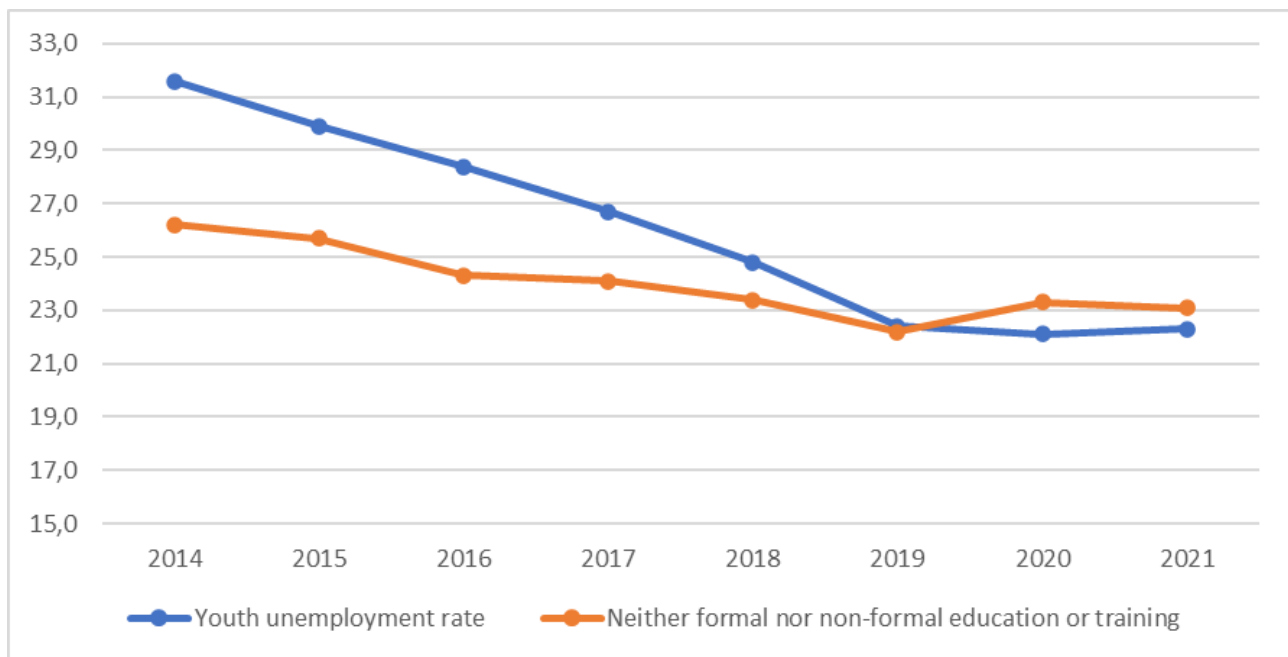
Italy

1. Overview of the target population and the development of traineeships

1.1 Main trends in youth unemployment and school-to-work transition

As a result of the 2008-2012 economic and financial crisis, the youth unemployment rate (15–29) in Italy reached a peak high (32%) in 2014. As shown in Figure 1 below, between 2014 and 2019 the share of unemployed young people steadily decreased. However; the COVID-19 pandemic reversed this positive trend as the socio-economic impact of lockdowns disproportionately affected youth. In 2021, the youth unemployment rate was 22%, 9 percentage points higher than the EU average of 13%.²²⁹ Furthermore, the COVID-19 crisis also had an impact on young people not in employment, education or training (NEETs), with the NEET rate slightly increasing from 22% in 2019 to 23% in 2021.²³⁰

Figure 7. Youth unemployment (15-29) and NEET rates in Italy between 2014-2021



Source: Eurostat

1.2 The prevalence of traineeships in Italy

From 2014 onward, **the number of ALMP traineeships in Italy has been steadily increasing**,²³¹ from 223 430 in 2014 to an average of 350 000 new traineeships in the following years. While the COVID-19 pandemic led to a sharp reduction in the number of traineeships in 2020, this was followed

²²⁹ Eurostat.

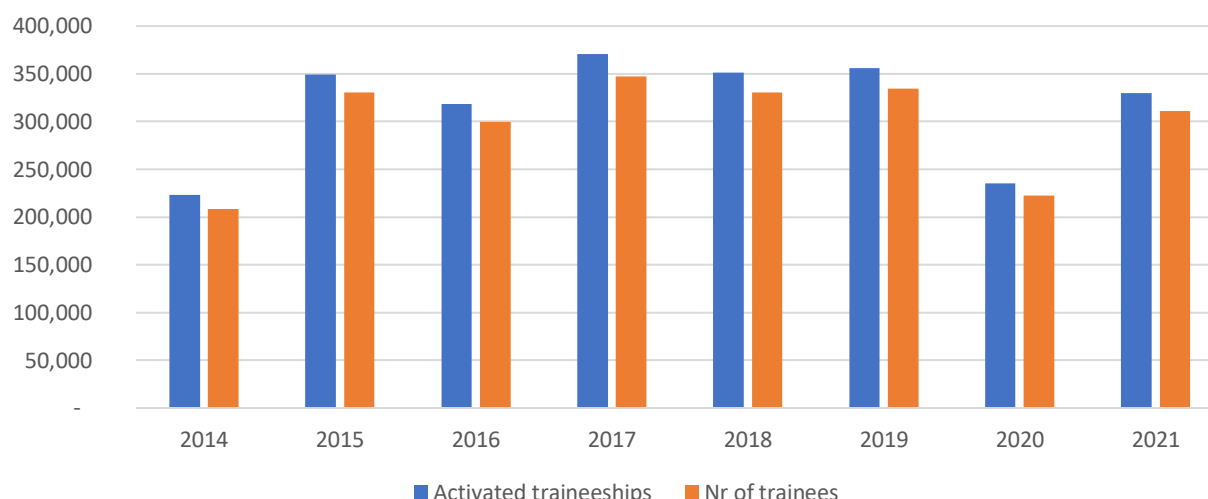
²³⁰ Eurostat.

²³¹ NB. ALMP traineeships are the only form of traineeship envisaged by the Italian legal framework i.e. Italy has no legal definition of open-market traineeships, which implies that the latter are not allowed. Therefore, the numbers in this section only refer to ALMP traineeships.

by a pronounced recovery in 2021, when 329 551 new traineeships were registered, involving more than 311 000 trainees.²³²

In terms of trainee characteristics, between 2014-2019, data shows that youth represented the vast majority of trainees, with young people up to the age of 19 making up for 16% of the total number of trainees, while those aged 20-24- represented 36%.²³³ The share of female and male trainees is almost the same, with slight variations depending on the specific age group. Furthermore, 1 trainee out of 10 has foreign citizenship (80% from non-EU countries), and around 13% belong to vulnerable groups.²³⁴ Between 150-170.000 traineeships providers are registered each year, hosting an average of 2 trainees each.²³⁵

Figure 8. ALMP Traineeships and trainees in Italy between 2014-2021



Source: Anpal, Inapp (2019) and (2021); MLPS (2022).

2. National and regional legislation and policies relevant to quality traineeships

In Italy, **only ALMP traineeships are regulated by law**. Under the current legal framework, these are defined as “extracurricular traineeships” to distinguish them from other types of traineeships (i.e., student traineeships; mandatory traineeships for specific professions; transnational traineeships).

The current legal framework regulating ALMP traineeships entered into force in 2013, and was partially revised in 2017. Under this framework, **overarching minimum standards are defined at national level, and act as the reference framework for further binding legislation on traineeships issued at the regional level**. At the national level, the main legal provisions are included in the following instruments:

- **Law n. 196/1997 (art. 18)** which regulated traineeship for the first time;
- **Law no. 92/2012 (art. 1, § 32-34)**, which introduced an extended reform of all employment contracts and set principles and criteria for a detailed State-Regions Agreement;
- Agreement of 24/1/2013 concluded at the State - Regions Permanent Conference for the approval of the first **"Guidelines on traineeships" (GL2013)**;

²³² MLPS, 2022.

²³³ Anpal, Inapp 2021

²³⁴ Anpal, Inapp 2021.

²³⁵ Anpal, Inapp 2021.

- Agreement of 25 May 2017 concluded at the State - Regions Permanent Conference on the **"Guidelines on traineeships with formative and guidance purposes" (GL2017)**;
- **Law 30 December 2021**, n. 234 "State budget law for the financial year 2022 and multi-year budget for the three-year period 2022-2024", § 720 – 726 (L2021).

3. Stakeholder views on traineeships

The research and consultations (interviews; focus group) conducted for this case study showed that views on traineeships vary depending on the stakeholder group.

Employer organisations consulted highlighted that traineeships play an important role in facilitating young people's labour market integration. According to this stakeholder group, traineeships act as a "trial period", allowing employers to have access to a pool of young people. Employers' views on the Italian legal framework on traineeships are generally positive, and their initial fears that the introduction of a mandatory monthly allowance would limit the further development of traineeships proved to be inconsistent. Furthermore, both employer organisations and representatives from the National Labour Inspectorate (INL) interviewed for this study stated that only a low percentage of traineeships are misused as cheap labour, and these cases should be tackled through both more intensive controls and other measures such as higher investments in Public Employment Services (PES).

Youth organisations and young people interviewed, however, underlined that, in their view, misuses still happen, and many employers take advantage of trainees as cheap labour. On a more positive side, these stakeholders commented that quality traineeships support trainees to gain new knowledge, skills and competencies, which can successfully support their school-to-work transition. They also noted that there should be a stricter selection process to identify traineeship providers, paired with increased efforts to ensure monitoring, and increased monthly allowances to ensure trainees receive fair pay.

Lastly, consultees across stakeholder groups mentioned that there are risks associated with the rise in the number of traineeships that Italy has seen since 2013, as even high-educated young people are being offered traineeships when entering the labour market, instead of entry-level positions.

4. Actions taken in response to the QFT

Most legislative and policy instruments regulating traineeships in Italy entered into force before the adoption of the QFT in 2014, with the exception of GL2017 (see section 2). The latter represents the most recent framework agreed at national level: it defines traineeships as "a formative measure of active labour market policy, aimed at establishing a direct link between a traineeship provider and a trainee to foster the development of knowledge, the acquisition of skills and the insertion or reinsertion into the labour market", and explicitly mentions that traineeships should not be regarded as employment relationship.

According to GL2017, traineeships should include the following elements:

- **Written agreement:** A written agreement has to be signed by a promoter (e.g., education institutions, PES, private agencies – to be officially recognised by the regional government), a traineeship provider and a trainee.
- **Learning objectives:** Learning objectives should be agreed between the promoter, the provider and the trainee and should be included in the written agreement.
- **Trainee allowance:** The Italian framework foresees a mandatory monthly allowance to be paid by the traineeship provider to the trainee. The amount cannot be lower than EUR 300

per month, with regional governments often establishing higher minimum pay (e.g., in the Lazio Region the minimum monthly allowance is EUR 800 per month). Trainees must attend at least 70% of the scheduled learning hours to be entitled to receive their monthly allowance.

- **Weekly and daily hours to be spent at the traineeship provider:** The Italian framework does not refer to “working time”, as traineeships are not considered to be a form of employment, the weekly/daily hours that trainees have to commit to during their traineeships have to be specified in their training plan. These cannot exceed the monthly working hours envisaged in the sectoral collective agreements.
- **Working conditions:** while there is no mention of sick leave/pay, trainees are granted an insurance covering injuries and accidents.
- **Double tutoring:** While the traineeship provider is responsible for the appointment of a tutor to guide and support trainees, the traineeship promoter is also required to designate a tutor, who cooperates with the traineeship provider for the preparation of the individual training plan. The tutor appointed by the traineeship promoters makes sure that an “individual dossier” is developed for each trainee, collecting information on the tasks carried out and the results achieved, to be used as evidence for the final certification of skills and competencies acquired by the trainee.
- **Recognition of learning:** Recognition of learning happens by establishing a link between traineeships and the National Qualification Repertory. The tasks carried out by the trainee are matched with qualification levels included in the Repertory, to ensure that the traineeship leads to a certification.
- **Monitoring:** Traineeship promoters are responsible for monitoring the quality of traineeships. Non-compliance with the regional regulations may result in penal, civil and administrative sanctions (e.g. prohibition for both the provider and the promoter to offer traineeship opportunities for the following 12 months).

While the GL2013 had been agreed before the adoption of the Council Recommendation for a QFT, with the 2017 revision, most of the key traineeship features foreseen in the Italian framework are in compliance with the QFT principles. The two **quality principles that are currently not reflected in the Italian framework** are:

- **Duration:** GL2017 sets a maximum duration of 12 months (extended to 24 months for specific groups, e.g. people with disabilities). This extended duration is considered to be best suited for the Italian context. Within this limit regional governments can implement different approaches to traineeship duration, depending on the specific needs of regional labour markets and regional youth unemployment rates (see figure below).
- **Transparency:** GL2017 does not include any specific provision on transparency of vacancies.

Figure 9. Regional approaches to traineeships

Regional approaches to traineeship duration
<p>Lombardy introduced different traineeship durations depending on the level of skills to be acquired (i.e., the more complex the skills are, the longer traineeship can last). Therefore, the maximum duration of a traineeship - extensions included – is set as follows:</p> <ul style="list-style-type: none"> • 6 months for traineeships aimed at the acquisition EQF level 2 and 3 skills; • 12 months for traineeships aimed at the acquisition of EQF level 4 and over skills <p>Emilia Romagna introduced an additional stakeholder in the management of traineeship: a “certifying body”, which is entrusted with skill certification at the end of the traineeships. The individual training plan has to refer to a recognised vocational qualification and at least one certifiable competence has to be acquired during the traineeship and certified after its completion. Any trainee who spent at least 45 days working with the traineeship provider is entitled to an assessment of the knowledge and skills acquired. All</p>

certifying bodies are officially appointed by the Region, depending on their compliance with specific requirements set at regional level.

It is not possible to establish a direct link between the implementation of the QFT and legal and policy developments in Italy, particularly given that the first legal frameworks regulating traineeships were adopted before 2014 (e.g.; Law no. 92/2012 and GL 2013). However, it can be said that over the last decade, the public debate around traineeships, and specifically on remuneration, was influenced by both the introduction of paid traineeships in France in 2008,²³⁶ and the publication of the European Youth Forum's 2011 Quality Charter on Internships and Apprenticeships, which called for decent remuneration for traineeships taking place outside/after formal education.²³⁷ This ultimately led to the inclusion of a mandatory monthly allowance for all ALMP traineeships in Italy.

5. Key evaluation findings

5.1 Effectiveness

While the GL2013 already included most QFT principles, **ensuring that the Italian framework on traineeships implemented the QFT was an explicit aim of the 2017 reform** that led to the adoption of the most recent instrument on traineeships, GL2017. Currently, **all QFT principles are included in national level policies and legislative instruments, with the exception of the principles on duration and transparency** (see section 4.1).

The **effectiveness of traineeships evidenced by data on the labour market integration of trainees**: according to a 2021 report by ANPAL,²³⁸ on average 54% of former trainees (2014-2019) found employment within six months after the completion of their traineeship. These results show that traineeships are an effective tool to stimulate and support youth unemployment in Italy. However, statistics are less positive when it comes to the labour market integration of young people with lower educational attainment, only one former trainee out of three being employed within six months from their traineeship.²³⁹

In terms of the **impact of the QFT on trainees**, transparency on the provision of a **monthly allowance, which was then made mandatory by law, has been seen as a positive step supporting young people undertaking traineeships**. Furthermore, the possibility of achieving a formal qualification recognising the skills gained through traineeships is also another element that has had a positive impact on trainees.

However, studies and surveys carried out on specific territories, such as the Municipality of Milan or the Metropolitan City of Florence²⁴⁰, raise some **concerns on the effectiveness of traineeships in terms of ensuring quality learning experiences**. The average size of Italian companies also represents a challenge to ensuring high-quality learning experiences for trainees. Due to their low number of employees, SMEs often do not have enough time and human resources to design and implement a quality learning process. Trainees consulted for this case study highlighted that **“training culture is lacking”**, and that this allows for low-quality traineeships to still exist, despite a relatively comprehensive legal and policy framework. Due to these misuses of traineeships, several

²³⁶ The youth organisations' protests held mainly in France at the beginning of the last decade stimulated an intense debate at European level that led to the definition of the Recommendation's proposal and informed the Italian reform of the traineeship, especially on the decision to introduce a mandatory allowance.

²³⁷ Cfr. European Youth Forum, Quality Charter on Internships & Apprenticeships, moving towards equal opportunities for young people in the labour market, art. 3, see it at <https://www.youthforum.org/files/European20Quality20Charter.pdf>

²³⁸ Anpal, Inapp 2021

²³⁹ Anpal, Inapp 2021

²⁴⁰ See CGIL, Cgil Nidil (2021), and Comune di Milano, Repubblica degli stagisti (2019)

interviewed stakeholders noted the **need for more thorough monitoring of traineeship quality** in Italy.

The GL2017 introduced several provisions regarding the monitoring of the overall traineeship. All traineeship promoters should draft a yearly report to contribute to the territorial monitoring entrusted to the Regions, which should include an evaluation on the labour integration of former trainees. At national level, monitoring report should be published on an annual basis. However, since 2017, only two national reports have been issued. A few regions have conducted some monitoring and evaluation studies, most of which were related to traineeships under the Youth Guarantee²⁴¹. While traineeship promoters are responsible for quality-checking the traineeships under their remit, the official monitoring lies with regional governments, which can conduct checks at random, and the National Labour Inspectorate (INL). The latter can intervene at the request of trainees or trade unions, as well as on its own initiative²⁴². However, **the INL is under-staffed in some areas and the inspections are not carried out on a regular basis**. In order for the INL to carry out more targeted inspections, an agreement has been signed with some Regions, for sharing information and databases.

Furthermore, according to some interviewed stakeholders, the lack of limitations in the consecutive use of traineeships might have **negative impacts on marginalised and vulnerable groups of young people**: as companies prefer to hire trainees amongst the most skilled and/or highly educated young people, the most vulnerable have access to fewer opportunities.

Lastly **the QFT's impact on cross-border traineeships in Italy has been low**. Currently, there are no national programs to promote transnational traineeships. However, the Ministry of Labour has supported the development of the Stage4eu app and website²⁴³, managed by INAPP, which collects and publishes information on traineeship vacancies in all EU countries.

5.2 Efficiency

The desk research carried out for this case study found that **quantitative data on costs and/or benefits of traineeships or of the implementation of the Italian regulatory framework on traineeships is largely lacking**.

Limited evidence exists on the costs associated with the introduction of a mandatory monthly allowance. As traineeship providers have to pay an allowance between EUR 300-800 (as a minimum, depending on the region) per month, traineeships have become more costly over time. Furthermore, an additional cost is represented by the fee to be paid to traineeship promoters.²⁴⁴ According to the results of a study funded by the Municipality of Milan²⁴⁵, the cost for activating traineeships is between EUR 100 and 200 in 33% of cases, and it exceeds EUR 200 in 52% of cases; only in 5% of cases the cost of the activation service is below EUR 100. Lastly, other costs include insurance (to be covered either by the training provider or the promoter, when the latter is paid) which depends on the economic sector and type of job, ranging from a few euros to 100 EUR per trainee.

Large investments through **national and EU funding** have been made to implement the Youth Guarantee in Italy. These resources have been used to increase traineeship provision by offering traineeship providers financial incentives to cover all or part of the costs. Financial support has also

²⁴¹ See for example Marzadro, 2021.

²⁴² Some figures from the latter are available in the 2018 INL Activity Report. They are the result of a special and targeted control activity and - according to the interviewed stakeholders from the INL - can't be intended as representative of the overall traineeship. On the contrary, the traineeship does not appear to be affected by a particularly high level of irregularities if we consider that - because of the careful intelligence activity that precedes all inspections - the average rate of irregularity found by INL staff inspection is low if compared to the usual outcomes.

²⁴³ <https://stage4eu.it/>

²⁴⁴ For instance, PES can act as promoter and their services are free. However, other promoters e.g. private organizations such as Manpower, Humana, which are accredited by the Labour Agency - have to be paid.

²⁴⁵ See Comune di Milano, Repubblica degli stagisti (2019). The study was based on a survey conducted in 2018 involving all the main local promoters (universities, CPI and others)

been provided through programmes funded by the Regions and often co-financed by the ESF²⁴⁶. For example, Emilia Romagna's Labour Agency pays traineeship promoters an amount between EUR 200-500, to profile potential trainee's employability. Moreover, while the Labour Agency does not cover trainees' monthly allowance, it covers the costs of the final assessment and certification (EUR 37 per hour for a maximum of 4 hours).

Despite the increase in the costs of traineeships due to the introduction of the monthly allowance, the increase in the number of traineeships in Italy is evidence that **the benefits of traineeships are higher than their associated costs.**

5.3 Coherence

There is **a high level of coherence between the QFT and the Italian legal framework on traineeships**, as the QFT principles and existing policies and legislative instruments at the national level share the same objective of supporting youth school-to-work transitions.

In terms of the **coherence between traineeship policies and other policies, strategies and measures in other related areas** in Italy, the case study showed that there is a recurring debate on possible overlaps and conflicts between traineeships and apprenticeships. On the one hand, some interviewed employer organisations noted that these forms of work-based learning respond to different needs and therefore can co-exist without any conflict or overlap: employers often offer both traineeships and apprenticeships, taking on young people first as trainees and at the end offering them an employment contract as apprentices. On the other hand, organisations representing larger companies have expressed their concerns on the increasing number of trainees, as opposed to declining participation in apprenticeships.

Lastly, according to stakeholders consulted for this case study, **the QFT is fully coherent with other relevant EU initiatives** (e.g., Youth Employment Initiative, EURES, European Solidarity Corps, Youth Guarantee). However, **concerns remain about a disproportionate increase in the number of traineeships for both young people and adults**, as this form of work-based learning has recently received additional support both at the EU and national level: for example, the new programme "GOL" (*Garanzia Occupabilità Lavoratori*), funded by Italy's National Recovery and Resilience Plan, aims to promote up-skilling and re-skilling for adults, including through a large use of traineeships.

5.4 EU added value

As most of the policy and legal instruments regulating traineeships in Italy were adopted before 2014, **developments in this area cannot be attributed to the QFT.**

Most of the consulted stakeholders for this case study, however, argued that the added value of the QFT lies in **providing an overarching framework** that can foster more coherence in national approaches to traineeships across Member States. Moreover, by establishing quality principles, the QFT can ensure that a minimum level of quality is provided. This is important in times of crisis, as higher levels of (youth unemployment) might encourage a race to the bottom in the labour market.

Lastly, interviewed stakeholders mentioned that the EU added value of the QFT would increase if there were more opportunities for **exchanges and mutual learning between Member States**, to share relevant data and research, as well as challenges and achievements linked to the QFT implementation.

5.5 Relevance

Almost all interviewed stakeholders agree that the QFT principles – as transposed into the Italian legal framework – are relevant to foster a stable labour market integration of young people. Several

246 For example: Programme "Re-Work" in Umbria, "Giovani sì" in Tuscany, "Piano PIPOL" in Friuli Venezia Giulia.

monitoring and evaluation studies, especially those carried out in relation the Youth Guarantee, confirm the positive impact of traineeships on young people's employability. Some stakeholders, however, express concerns with regards to lack of sufficient protection against potential misuses and abuses of traineeships: youth organisations in particular highlighted that only good quality traineeships can truly support young people's school-to-work transition by providing trainees with relevant skills and competences.

Moreover, while some interviewees mentioned that traineeships are relevant for both young people and adults and therefore should target both groups; others insisted that young people should remain the primary target audience of traineeships, as youth needs specific support. To this end, these stakeholders also mentioned the need for **accompanying measures to provide further support to specific groups** (e.g., long-term unemployed youth, or low-educated /low-skilled young people). Furthermore, **the QFT principle on recognition of learning was considered to be particularly relevant**. While already included in the Italian framework regulating traineeships (GL2017), stakeholders - national authorities and social partners in particular - agreed that provisions related to the final skills assessment and certification could be further strengthened.

In relation to **the non-binding nature of the QFT**, according to some interviewed stakeholders, too much room has been left to Member States to decide whether to implement the QFT principles. However, other stakeholders argued that the non-binding nature of the QFT would allow for the reinforcement of some of its principles and/or the introduction of new ones.

Consulted stakeholders agreed that **the QFT principles still correspond to the current needs in Italy**. However, some suggested that EU could be more ambitious with regards to trainees' remuneration, by introducing **a principle on a mandatory allowance for trainees**, which would increase the relevance of the QFT, ensure stronger protection for trainees, and better coherence across Member States. All consulted stakeholders highlighted the relevance of introducing compulsory remuneration in Italy. While allowance levels are still largely debated (e.g. according to young people²⁴⁷, current standards are too low compared to the costs of living), the insertion of an obligation to remunerate trainees has encouraged a greater and more meaningful involvement on the side of traineeship providers.

Lastly, given its socio-economic impacts on youth, some interviewed stakeholders expressed concerns about the economic crisis caused by the COVID-19 pandemic and Russia's invasion of Ukraine resulting in a further increase in the number of traineeships (as opposed to entry level jobs). These stakeholders cautioned that an increased use of traineeships might have a negative effect on entry-level wages for youth. The growing interest in using the traineeship for re-inserting adult people who lost their job raises other concerns, with some stakeholders proposing the adoption of a specific regulation for adult trainees, with a higher allowance and a more robust supporting system.

247 Based on interviews.

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List of interviewed stakeholders

- Ministry of Labour, Adviser at Cabinet of the Minister
- ANPAL– Expert on PES - Responsible of Research Structure 4
- Confindustria - Area Lavoro Welfare e Capitale Umano
- President of Fondazione Lavoro - Consulenti del Lavoro
- Journalist - Repubblica degli stagisti
- Director of the Unit “Mercato del Lavoro e Politiche Attive”, Lombardy Region
- INL – National Labour Inspectorates
- Service for Education and Labour policies, Agenzia regionale per il lavoro - Emilia-Romagna (Regional Employment Agency)
- CGIL, “Labour Market” Area
- National Youth Council - Consiglio Nazionale Giovani (CNG), Presidency Board in charge of Youth Labour Policies

Focus group participants

The national expert tried to arrange a focus group with the support of CNG. However, only two former trainees expressed an interest in participating in the consultation and, therefore, two individual interviews were carried out instead of a focus groups

Lithuania

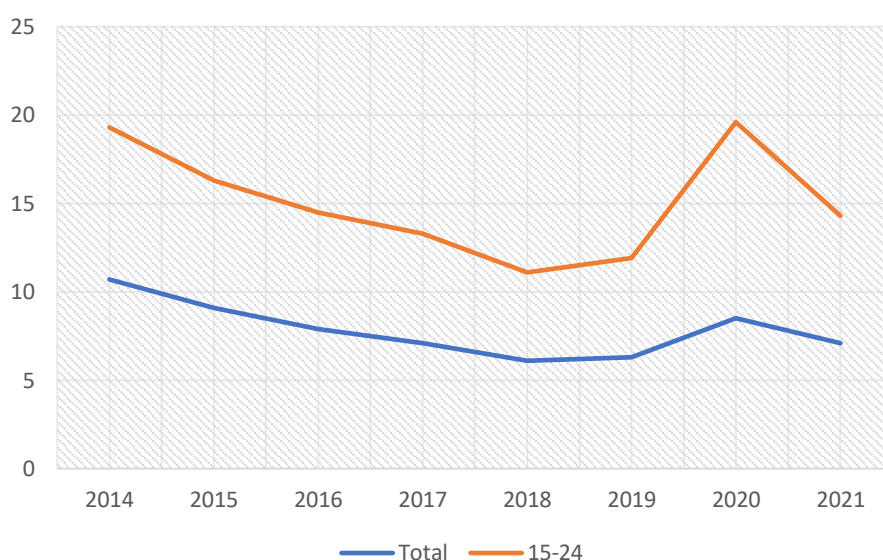
1. Overview of the target population and the development of traineeships

1.1 Main trends in youth unemployment and the school-to-work transition

The employment rate among 15-64 years old population in Lithuania is traditionally higher as compared to the EU-27 average. However, this is mainly determined by the higher employment rates of adult and older employees. The employment rate of 15-24 years old is below the EU-27 average (see Figure 10. Youth (15-24) and total unemployment rate in Lithuania in 2014-2021).

Compared to the total unemployment rate, youth unemployment over the period 2014-2021 was almost twice as high. For example, in 2021 the unemployment rate of 15-24 years old stood at 14%, whereas total unemployment rate was 7% (see Figure 10). Young employees also suffered the most from the pandemic's impact on the labour market.

Figure 10. Youth (15-24) and total unemployment rate in Lithuania in 2014-2021



Source: Statistics Lithuania.

According to the PES²⁴⁸, despite a recent decrease in youth unemployment, the main problem among youth registered at the PES remains their **non-preparedness for the labour market**. Approximately half of young people (up to 29 years old), registered at the PES in the first half of 2022, did not have a completed qualification either in higher education, nor in vocational education. This is very pronounced for youth up to 24 years old – in this age group persons without professional qualification comprised more than 60%.²⁴⁹

²⁴⁸ PES, 2022c.

²⁴⁹ PES, 2022c.

1.2 The prevalence of traineeships in Lithuania

The main reasons hindering youth insertion into the Lithuanian labour market, according to the Ministry of Social Security and Labour (MSSL)²⁵⁰ are:

- acquired professional qualification is incompatible with labour market needs;
- lack of work experience;
- lack of motivation, social competencies or job seeking skills;
- high expectations of youth.²⁵¹

In general, there is a **rather low prevalence of both ALMP traineeships and open market traineeships** (OMT) in Lithuania. ALMP traineeships emerged in Lithuania at the end of 2014, after the QFT, however during 2015-2016, there were on average 300 traineeships per year. Since 2017, when the new Law on Employment was adopted, the number of traineeships increased, however; it remained in general rather low compared to the total number of unemployed youth. Over 2018-2019 there were approximately 700 trainees (traineeship agreements) per year. After the onset of the pandemic, this number decreased even more and in 2020, there were approximately 400 and in 2021 – approximately 200 ALMP trainees (traineeship agreements).²⁵²

Open market traineeships in Lithuania are the so-called **voluntary practice**; during 2015-2017, the number of persons participating in **voluntary practice** was on average 1500 per year; during 2018-2020 - approximately 2000 per year.²⁵³ The number of open market traineeships is higher than the number of ALMP traineeships mainly due to the fact, that participation in open market traineeships is 'open' to any person in the market, whereas ALMP traineeships are only for unemployed persons satisfying particular requirements.

Young trainees (up to 29 years) comprise on average 30% of all ALMP traineeship participants²⁵⁴ and approximately 80% of participants in open market traineeships.²⁵⁵ Information on traineeship opportunities available on the market is not available in Lithuania.

Sectors in which ALMP traineeships were the most prevalent during 2017-2021 were: wholesale and retail trade; repair of motor vehicles and motorcycles – 19% of all traineeships; human health and social work activities - 11%; manufacturing - 10%; agriculture, forestry and fishing - 9%; accommodation and food service activities - 8%.²⁵⁶ Open market traineeships are more prevalent in banks and hospitals.²⁵⁷

2. National and regional legislation and policies relevant to quality traineeships

ALMP traineeships are defined in the Law on Employment (article 39). A traineeship is defined as unpaid work practice period, intended for the improvement or restoration of the personal occupational skills or professional qualifications and may be organised for the unemployed who possess the relevant professional qualification or a competence acquired by a non-formal learning, provided that the person has not worked using such qualification or competence for at least 6 months in succession. The length, purpose and other conditions of traineeship are set in a **traineeship trilateral agreement** concluded by and between PES, the institution, enterprise, organisation or

250 MSSL, 2022b.

251 MSSL, 2022b.

252 PES, 2022b.

253 MSSL, 2022.

254 MSSL, 2022b.

255 MSSL, 2022.

256 MSSL, 2022b.

257 MSSL, 2022.

another organisational structure providing the traineeship and the trainee. The traineeship duration should not exceed 6 months and during it the trainee shall be ensured for at least 20 hours and not more than 40 hours per week. The trainee also receives a monthly grant throughout the traineeship period, depending on the number of training hours. The amount of the grant is the choice of the trainee, 39% of the minimum monthly wage (MMW) (in 2022 this was around 285 EUR) or the unemployment social insurance benefit (USIB), to which the trainee is entitled as an unemployed person (the amount of USIB depends on the previous income of the unemployed; average USIB in mid-2022 was close to 450 EUR²⁵⁸). The amount of the grant is reduced in proportion to the training hours that had been scheduled but were not attended. On expiry of the term of payment of the USIB (usually USIB is paid up to nine months), the trainee is paid a grant equal to 39% of the MMW for the remaining traineeship period. The traineeship provider issues PES a free form certificate indicating the duration and the assessment of traineeship results. The same certificate might be issued to the trainee at his/her personal written request (LE, 2016).

Open market traineeships in Lithuania are defined as voluntary practice. Persons are entitled to enter into voluntary practice agreements with enterprises, institutions or other organisational structures at which the voluntary practice takes place. The voluntary practice is unpaid. A person may undergo voluntary practice under only one voluntary practice agreement at the same time. The voluntary practice agreement may be concluded with the same organisation only once. The number of voluntary practice traineeship agreements at the organisation may not exceed 10% of the total number of employees of the organisation, and where the organisation has fewer than 10 employees, this organisation may have only one valid and current voluntary traineeship agreement. The term of the voluntary practice agreement concluded by a person, or the total term of all such agreements concluded by the person may not exceed 2 months within a calendar year. A person may enter into a voluntary practice agreement not more than 3 times, and the total term of all such agreements may not exceed 6 months (LE, 2016).

3. Stakeholder views on traineeships

There are actually no “real” or wide public debates about the role of traineeships and the importance of their quality for young people in Lithuania. However, in general, all interviewed stakeholders agreed that there is great value of traineeships for both employers and young people. Neither employers and employer organisations, nor youth organisations have any official views or positions regarding traineeships. This was the case in 2014 and remains the case now. It should be noted that overall, in Lithuania, both employers and youth organisations know little about traineeships *per se* and especially about the QFT.

4. Actions taken in response to the QFT

The main principles of the QFT were implemented in the national legislation from the 1 September 2014 (as regards ALMP traineeships) and from the 1 January 2015 (as regards open market traineeships). However, more QFT-related legislation was introduced in Lithuania on 1 July 2017 when the new Law on Employment, implementing most of the QFT principles, came into force. It is rather difficult to judge the impact/influence that the Council Recommendation had on the provision of quality traineeships in Lithuania. From the stakeholder interviews however, it can be concluded that the QFT provided a key impetus for the introduction of these regulations. It is possible, that without the Council Recommendation ALMP or OMT traineeships *per se* would not have been introduced and only educational traineeships (based on trilateral cooperation between the educational institution, the trainee and the employer) would have been used. Educational process traineeships have been important before and after 2014 up till now.

²⁵⁸ <https://socmin.lrv.lt/lt/veiklos-sritys/socialine-statistika/pagrindiniai-socialiniai-rodikliai>

ALMP traineeships

Since September 2014, the majority of recommendations under the QFT have been implemented in Lithuania by virtue of revisions of the national legal framework. However, national measures still do not (fully) cover some aspects of several principles of the QFT (for more details see Coherence section).

According to the valid legislation (LE, 2016; Order, 2019):

- A trilateral agreement between PES, company and trainee is concluded;
- The length, purpose and other conditions of traineeship are set out in the trilateral agreement. The trainee (unemployed in that case) shall be paid a grant, once a month throughout the traineeship period, having regard to the number of hours of training;
- Personal occupational skills or professional qualifications that have to be improved or restored during a traineeship are specified in the Trilateral agreement, therefore one may expect that tasks shall allow the trainees to work towards their learning and training objectives;
- In the trilateral agreement, the obligation of the traineeship provider (employer) "to assign a supervisor and create conditions for him to perform his functions" should be indicated;
- During the term of the traineeship, the trainee shall be ensured at least 20 hours and not more than 40 hours per week. This corresponds to the standard working hours per week, defined in the Labour Code. Minimum holiday entitlements are not mentioned in the traineeships-related legislation.
- Traineeship providers are not obliged to clarify if they provide trainees with health and accident insurance or sick leave, however; during the traineeship, the status of an unemployed person is retained and as all unemployed persons, trainees are covered with compulsory health insurance by the state. However, they are not covered with accident insurance;
- Trainees' entitlement to the grant (or unemployment social insurance benefit) has to be clearly defined in the trilateral agreement;
- The length of the traineeship should not exceed 6 months and in the form of the change of the agreement, extension is not foreseen. However, if the agreement is concluded for less than 6 months it can be simply amended/ extended;
- The standard trilateral agreement on the traineeship includes information on how the trainee/traineeship provider can terminate the traineeship. The employer can terminate the agreements if he notifies the parties 5 days in advance. The trainee can terminate the agreement only in particular cases – in case of illness, injury, pregnancy (70 calendar days before delivery), delivery (and 56 days after delivery), compulsory military service. If the trainee terminates traineeship agreement due to any other reason he loses unemployment status for 6 months following the termination;
- The organisation providing the traineeship issues PES a certificate of the length of the training and the assessment of the traineeship results. The same certificate might be issued to the trainee at his/her personal written request;
- There is no regulation on the vacancy notices and advertisements information in Lithuania. However, when/if an employer applies to the local PES with the proposal for a traineeship, he/she provides information on the conditions of the traineeship.

OMT (voluntary practice)

Since January 2015, the majority of recommendations under the QFT have been implemented in Lithuania by virtue of revisions of the national legal framework governing open market traineeships. However, national measures still do not (fully) cover some aspects of several recommendations to the valid legislation (LE, 2016; Order, 2016):

- In the case of open market traineeships, bilateral agreements between a company and a trainee is concluded;
- The bilateral agreement specifies: the nature of activities, working conditions, obligations of both parties, duration of the traineeship. There is no obligation to indicate educational objectives in the bilateral agreement. The allowance or compensation is also not mentioned, but according to national legislation open market traineeships are unpaid;
- In the bilateral agreement, the “nature of the activities” foreseen during the open market traineeship is described, however there is no strict regulation to provide information if these activities allow the trainee to work towards his/her learning and training objective;
- Traineeship providers have to assign a supervisor for the trainee. This has to be also clearly indicated in the bilateral agreement;
- There is no regulation of trainees' rights and working conditions (i.e. limits to max weekly working time, weekly rest periods, minimum holiday entitlements), however; this might be due to the fact, that trainees are not treated as employees. In practice, trainees usually work shorter working hours compared to regular employees;
- Traineeship providers clarify in the bilateral agreement that trainees are provided with the social insurance of health and accidents at work and occupational diseases at the cost of the State during the period of practice. However, they are not provided with sick leave and accordingly, the sick leave is not mentioned in the agreement;
- The term of the agreement concluded by a person, or the total term of all such agreements concluded by the person may not exceed 2 months within a calendar year. A person may enter into an open market traineeship agreement no more than 3 times, and the total term of all such agreements may not exceed 6 months;
- As a maximum term of agreement is 2 months, extension is not foreseen in the national legislation. However if the agreement is concluded for less than 2 months it can be simply amended/extended;
- The agreement can be terminated either unilaterally if one party violates obligations set in the agreement or by common agreement, if it is determined by unexpected, objective and sound reasons;
- After completion of the traineeship the supervisor submits a written assessment of the trainee (to him/her);
- There is no regulation on the vacancy notices and advertisements information in Lithuania. However, there are several webpages²⁵⁹ where employers provide some basic information on the conditions of traineeships. Though these webpages were mainly developed by the initiative of educational institutions, persons might find places for voluntary practice here as well.

5. Key evaluation findings

5.1 Effectiveness

Most of the principles of the QFT were implemented in Lithuanian legislation from 1 September 2014 (in case of ALMP traineeships) and from 1 January 2015 (in case of OMT). Additional QFT-related legislation (valid today) was further introduced on 1 July 2017, when the new Law on Employment came into force. The principles of the QFT are thus almost fully implemented in

²⁵⁹ For instance, www.gerapraktika.lt, www.internship.lt

national legislation. The only aspects of the QFT not fully implemented in ALMP-related legislation are:

- According to national law, traineeships shall not be longer than 6 months. However, if the traineeship agreement was signed for a shorter period it can be simply renewed.
- While the traineeship provider has to issue a certificate to the PES at the end of the traineeship, this is only provided to trainees if they request it.

The only aspects of the QFT not implemented in open market traineeship-related legislation are:

- there is no strict obligation to indicate educational objectives or tasks allowing trainees to work towards their learning and training objectives in the bipartite agreement;
- according to national legislation, OMT is unpaid, therefore the written agreement does not mention neither if the trainee is entitled to an allowance or compensation, nor the amount;
- Moreover, it is not clear how to qualify the implementation of recommendation to clarify the circumstances and conditions under which a traineeship may be extended or renewed after the initial traineeship agreement expired. According to national law, traineeships over 2 months per year are not allowed in Lithuania. However, if the traineeship agreement was signed for a shorter period, it can be simply renewed.

As regards ALMP traineeships, the **main enforcement and monitoring mechanisms are organised by the local PES offices** (they sign a trilateral agreement, monitor attendance of the trainee every month, pay a grant as well as receive and analyse reports of the traineeships supervisors) and also by the Division of Supervision of Measures and Services of the National PES (they perform supervision of all ALMP including traineeships by going directly to the workplaces and inspecting real conditions of the traineeship). Moreover, PES regularly analyses data on traineeships' efficiency, distribution by sector, age, and provides this analysis to the regularly analyses data on traineeships' efficiency, distribution by sector, age, and provides this analysis to the Ministry of Social Security and Labour (MSSL). According to PES representatives, the mechanisms in place (compulsory requirement to sign trilateral agreement, attendance monitoring, inspections, supervisors' reporting) are rather sufficient for effective enforcement and monitoring and for ensuring compliance with national legislation/ quality frameworks.

Monitoring of implementation of open market traineeships started in Lithuania at the beginning of 2015 and continued for three years (2015-2017). After adaptation of the new Law on Employment in mid-2017, legislation governing open market traineeships stipulated that there is no longer a need to continue monitoring this type of traineeship further. Currently, therefore only analysis of numbers of open market trainees is recorded by State Social Insurance Board and from time-to-time analysis of this information is performed by the Ministry of Social Security and Labour.

The **main impact of the QFT was the introduction of ALMP and OMT traineeships in Lithuania per se**. Though interviewed stakeholders stressed that the entire system is important, the main components mentioned are compulsory conclusion of a written traineeship agreement, the specification of learning and training objectives, working conditions as well as the requirement to appoint a supervisor. Examples of good practices include various initiatives of the state and/or relevant institutions aimed at increasing the visibility, transparency, security and the overall usage and effectiveness of traineeships.

Transparency on traineeships

The web page of the State Social Insurance Board provides comprehensive and up-to-date information about regulations, social insurance in case of OMT (when the insurance is provided, tariffs paid, duration, etc.).²⁶⁰ As a result, young persons and employers to receive all necessary information in one place.

Other examples of good practice are ESF-funded projects aimed at increasing youth employability. According to the interviewed stakeholders, the main strength of these projects is the complexity of

²⁶⁰ This information is available at the web page "I am a trainee" (Sodra, 2022a).

measures used. Due to the rather solid funding (received from two sources – the ESF and state budget) traineeships are incorporated among other measures aimed at increasing youth employability. The Box below provides a short description of such a project.

Project 'Promotion of Youth Employment 2019-2022'

Objective

To support the integration of young people into labour market. The project is implemented by the PES in the period between 2019-2022.

Target group:

Young people aged 16-29 years, who are not in education, employment or training, are registered with the Employment service and have previously participated in the projects of primary intervention (e.g. "Discover yourself", "Let's move", "Enhancement of Youth Social Competencies"). The youth is offered to participate in active labour market measures including among others:

Support for learning – participation in traineeships that shall enhance the development of professional skills

Supported employment – e.g. subsidised employment – project participants, employed through subsidies will be reinserted into the labour market, increasing their chances of becoming active and remaining competitive in the labour market.²⁶¹

Though in general numbers of trainees in Lithuania are not high, **both types of traineeships are important measures allowing young people to acquire necessary practical experience** facilitating easier labour market insertion. According to the representatives of the Ministry of Social Security and Labour, the effectiveness of the QFT depends not so much on any objective criteria, but on the particular situation of a particular person e.g. ALMP traineeships are used mainly by/for those persons for whom any other ALMP measure (or placement) is not suitable at the moment.

In terms of **traineeship providers**, interviewed stakeholders noted that the QFT proved to be particularly effective for providers in the public/NGO sector, as well as some sectors (e.g. retail trade, repair of motor vehicles). Companies and organisations can "test" an employee without employing them. Implementation of the QFT was also found to be important for companies/ organisations who face difficulties in finding employees.

Among the obstacles faced by traineeship providers, the limitation of 10% (the share of trainees as compared to the overall number of employees) was mentioned, as it can discourage small companies to offer open market traineeships, as the benefit of having only one trainee is usually not worth the cost. Another important obstacle as regards ALMP traineeships is the absence of social insurance of accidents at work which is especially relevant for employers operating in the manufacturing sector. Employers interviewed also mentioned as "too much bureaucracy" as an obstacle, especially for ALMP traineeships. However it should be stressed that these obstacles are not linked to QFT, but rather to bottlenecks caused by national legislation.

The **absence of legal possibility to pay for trainee** also emerged as a limit of the legislation in place to implement the QFT. Employers who want to have a motivated trainee often want to pay them but there is no legal mechanism allowing them to do so. The lack of remuneration may also act as deterrent for young people themselves. For ALMP traineeships that are paid, the low level of the grant offered to trainees was seen by some stakeholders as reducing the interest and take-up of traineeships by young people.

According to evaluations, the **ALMP traineeships are less effective than vocational training and apprenticeships in facilitating labour market integration, however, they still have a rather high impact on the labour market insertion of unemployed**: according to information provided by the PES and the Ministry of Social Security and Labour in 2021, one month after the completion of an ALMP traineeship, 54% of 16-29 years old were in employment; accordingly, after 6 months - 64%, after 12 months - 66%, after 24 months - 58%. It is important to note though that the traineeship is not the most effective ALMP measure as it does not necessarily create a sustainable relationship

²⁶¹ See, <https://www.jaunimogaratijos.lt/en/projects/promotion-of-youth-employment-2019-2022/384>

between the trainee and the employer. The employer does not feel sufficiently committed to the contractual obligations of the traineeship and is not obliged to employ the person after the traineeship. Following the traineeship, the trainee obtains less tangible new qualifications and skills that are difficult to evaluate, so it does not necessarily increase the chances of employment either with that particular employer, or any other. It depends to a larger extent on the ability of traineeship provider to formulate the tasks for the trainee. Nevertheless, 2019 evaluation²⁶² showed that "traineeships [...] had helped participants to better integrate into the labour market".

Regarding **cross-border traineeships**, according to the representatives of the responsible Ministry of Social Security and Labour, ALMP traineeships are aimed at national unemployed and national companies (traineeship providers) – therefore, there has been no need to extend them to other countries.

5.2 Efficiency

In the case of **ALMP traineeships**, costs and/or administrative burdens incur for PES, state budget or EU funds, employers and young trainees:

- PES experiences costs related to the administration and implementation of ALMP measure;
- Traineeship grants are funded from ESF and/or state budget. According to PES information²⁶³, in 2021 around 200 unemployed participated in the ALMP traineeships. For these 200 traineeships around 150,000 EUR were used (134,000 EUR from ESF and 15000 EUR – from the national budget). As mentioned above, the amount of the grant is the choice of the trainee: 39% of the minimum wage (currently this amount is equal to around 285 EUR) or the unemployment benefit, to which the trainee (as unemployed) is entitled to (the amount of USIB depends on the previous income of trainee; average USIB in mid-2022 was close to 450 EUR²⁶⁴). Also, some travel expenses might be reimbursed;
- Employers experience some administrative burden related to the PES oversight and appointment of a supervisor. Unfortunately, these cost have never been analysed or calculated;
- Young trainees experience alternative costs of lost/not received wages and salaries.

In the case of open market traineeships, costs and/or administrative burdens incurred by the state budget, State Social Insurance Fund Board, employers and young trainees:

- The state budget bears the financial costs (due to social insurance of trainees). According to the information provided by the MSSL, in 2020 in total 2.1 thousand persons participated in OMT; expenditure for health social insurance was 11.8 thousand EUR and for social insurance of accidents at work and occupational diseases – 2.4 thousand EUR;
- State Social Insurance Fund Board experiences some administrative burden;
- Employers experience some administrative burden related to the information providing for the Board as well as appointment of supervisor;
- Young trainees experience alternative costs of lost/not received wages and salaries.

Some indirect costs also incur for the MSSL due to administration and supervision/monitoring of the measures and implementation of the QFT.

The main **benefit** for young people is in general the possibility to take up a traineeship and in this way to increase their possibilities of labour market insertion. Due to availability of traineeships, employers (traineeship providers) receive possibility to have trainees and in this way to "test"

262 BGI Consulting, 2019

263 <https://uzt.lt/darbo-rinka2/adrrp/>

264 <https://socmin.lrv.lt/lt/veiklos-sritys/socialine-statistika/pagrindiniai-socialiniai-rodikliai>

potential employees with less costs comparing to employment contract. According to some interviewed stakeholders, in case of students performing traineeships, the experience and knowledge gained may improve learning outcomes of a student (trainee).

According to the representatives of the main managing authorities – the MSSL and the PES – costs and benefits of the traineeships are proportionate; there is no scope for lowering costs.

5.3 Coherence

All interviewed stakeholders agreed that implementation of the QFT is very much coherent with education, training, employment and social policies in Lithuania. Both measures comprise part of the overall national policy aimed at providing youth with adequate practical experience and skills. Some stakeholders pointed out however, that there is some overlap between open market traineeships and traineeships as part of educational process, performed under trilateral agreement between educational institution, trainee and employer. Some “infrastructure” created by educational sector might be/is used by open market traineeships as well.²⁶⁵

Interviewed stakeholders also confirmed, that the implementation of the QFT is very much coherent with EU initiatives. It is part of the overall policy aimed at providing young people with adequate practical experience and skills. The ESF is used for the funding of traineeship grants.

5.4 EU added value

The QFT brought clear added value to the Lithuanian context by initiating the introduction of new measures - ALMP and OMT (voluntary practice). Without the QFT, it is possible that traineeships in Lithuania would have been only available as part of the education process, meaning that young people not participating in educational processes would have never had the possibility of undertaking a traineeship.

Nevertheless, as regards volume, scope, role and process effects it has to be stressed that in general, both ALMP and open market traineeships (voluntary practice) are not very popular or widespread in Lithuania and therefore, neither have played a crucial role in the availability of quality traineeships, nor led to structural changes in employment, education or training policy or related frameworks in Lithuania.

It is difficult to forecast, but according to the interviewed stakeholders, since all main principles of the QFT are already implemented in national legislation, discontinuing the QFT at EU level (“no-policy-change” scenario) would likely mean that the situation in Lithuania would remain unchanged. If some new principles will be introduced at the EU level, this will undoubtedly influence the situation in Lithuania as well.

5.5 Relevance

From the stakeholder interviews conducted it can be concluded, that in general, traineeships implementing QFT principles are very much appropriate in getting young people into sustainable and quality employment. It was especially stressed by the representatives of employers and the MSSL, that they are of great benefit for both sides – the traineeship providers/employers and the trainees. Another aspect, mentioned by the representatives of the MSSL, is that both, the ALMP traineeships and open market traineeship are only a small part in the overall spectrum of measures aimed at (youth) insertion into the labour market. Therefore, they are used in those cases and for those people for whom they are the most appropriate.

Among the strengths of the implementation of QFT principles in Lithuania is the strict national which saw the majority of the main QFT principles directly introduced into the national legislation, as outlined in section 2. Moreover, according to the interviewed stakeholders, in the national legislation

²⁶⁵ <https://internship.lt/>

there are enough provisions aiming at preventing the possibility of using traineeships to replace regular employment for young people. Specifically, these are limitations related to the duration and the frequency of traineeships as well as - in case of open market traineeships – limitations related to the share of trainees in a company, compared to the total number of employees (no more than 10% or 1 trainee in companies with less than 10 employees).

The most relevant aspects of successful and quality traineeships included the definition and completion of learning objectives and some aspects related to rights and social protection of the trainee i.e. appropriate payment and full social insurance during the traineeship period for ALMP traineeships. In contrast, the absence of a requirement or possibility to receive payment was also mentioned as the main obstacle in ensuring open market traineeships remain relevant to fostering labour market integration as it limits equality of access to traineeship opportunities. This is particularly the case for young people from a lower socio-economic background for whom the absence of the remuneration prevents them from undertaking an open market traineeships. Also, in the case of ALMP traineeship, it should be noted that the level of the grant paid is usually rather low (for more details see section 3.2).

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List of interviewed stakeholders

- Head of the Measures' Implementation Organisation Division of the Public employment service
- Youth Guarantee coordinator for Lithuania, Advisor of the Labour Market Group of the Ministry of Social Security and Labour
- Advisor of the Labour Market Group of the Ministry of Social Security and Labour
- General Director of the Lithuanian Business Confederation – ICC Lithuania
- President of the Union of Vilnius Youth Organisations "Round table"

List of additionally contacted stakeholders who provided information

- Expert of the Lithuanian Confederation of Industrialists
- Expert of National EURES, Coordination division
- Deputy of the Chief Labour Inspector of the Republic of Lithuania, State Labour Inspectorate
- Chancellor of the State Labour Inspectorate
- President of the Lithuanian Youth Council

Director of the Department of Youth Affairs

Project coordinator of the Department of Youth Affairs

Coordinator and psychologist at the civil society organisation, representing youth with fewer opportunities Actio Catholica Patria

Expert at the occupational relations consultation company Supervizija

Expert at the occupational relations consultation company Supervizija

Director of the consulting company, operating in digital recognition of skills and achievements Badgecraft

Focus group

The focus group was not organised due to several reasons. In the case of OMT, there is no source through which trainees can be contacted e.g.- receiving their personal data from the Social Insurance Fund Board is not possible due to data protection legislation. In the case of ALMP traineeships, personal data of ALMP trainees is kept by the PES, which cannot be provided to third parties. Hypothetically, there might be a possibility to find some trainees through youth organisations. However, during drafting of the case study all main national youth organisations were contacted and none of them could provide contact details of young persons, who participated neither in ALMP traineeships, nor in OMT. Therefore, there are actually no sources of information for selecting focus group participants in Lithuania.

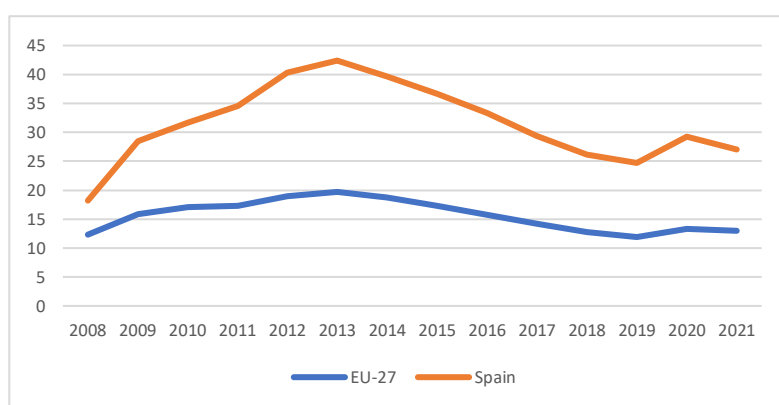
Spain

1. Overview of the target population and the development of traineeships

1.1 Main trends in youth unemployment and school-to-work transition

The youth unemployment rate in Spain is very high. Although the situation has improved considerably since 2013, the youth unemployment rate in 2021 was still 27%. This rate has remained two times higher than the EU-27 average since 2011.

Figure 11. Youth unemployment rate (15-29 years), EU-27 and Spain, 2008-2021



Source: Eurostat

1.2 The prevalence of traineeships in Spain

Existing data suggests that **the prevalence of traineeships in Spain is low**. There are various modalities of traineeships, grouped into: A) labour traineeships with a traineeship contract (equivalent to OMT), and non-labour traineeships, including both B) ALMP-related traineeships and C) extracurricular (voluntary) university traineeships.

- A) There is one labour contract devoted to **labour traineeships**, the so-called traineeship contract (*contrato en prácticas*): according to data on contracts provided by the national Public Employment Service (SEPE), the number of traineeship contracts (for those aged 16-29) increased from 55,665 in 2014 to 95,804 in 2018, but has since dropped to 70,000 in 2021. In 2021, the traineeship contract (all ages, no age detail at sectoral level available) was signed 30,672 times (one person may sign more than one contract in one year), 92% of which were in service sectors (e.g. education, hotellery and commerce).
- B) There is no readily available data on **ALMP-related traineeships** as provided by PES. However, while there is no data on non-labour traineeships without economic compensation, those non-labour traineeships that receive an economic compensation involve social security (SS) contributions and are thus recorded: according to data provided by the social security authorities, since 2014, the number of trainees registered with SS has increased steadily from 48,000 to 71,000 in 2019 and 2021, after the fall caused by the pandemic in 2020.
- C) **Extracurricular university traineeships** may or may not include an economic compensation (if they do include compensation, they are included in the data on B) ALMP-related traineeships). According to the Council of Universities, about 60,000 students carried

out an extracurricular traineeship in 2017/2018. There is no information on traineeship opportunities readily available.

Therefore, there is no official and regular data that shows the prevalence of the different modalities of traineeships in Spain. The LFS, elaborated by INE (Spanish Statistical Institute), does not include information about this, nor do the various registers of the Ministry of Labour or those of the universities.

2. National and regional legislation and policies relevant to quality traineeships

The national legislative framework in Spain is shaped by a set of regulations passed over the last 25 years. There have been some legislative changes between 2014-2020 and, more recently, at the beginning of 2022 (see Box 1 in the Annex).

Open market traineeships (OMTs)

There are two kinds of OMT in Spain: one is defined through labour contracts and the second one allows university students to undertake voluntary extracurricular traineeships:

- **Traineeship contract** for university or VET graduated students under 30 years of age aimed at getting a first work experience (RD 488/1998) (called 'training contract aimed at getting professional experience' after the recent labour market reform RD 32/2021, passed in February 2022 and in force in 30 March 2022);
- **Extracurricular traineeships for university students**, operated through the universities, that do not involve a labour contract (RD 592/2014). RD 1493/2011 stated that all trainees without a labour contract but with an economic compensation must be registered with the social security.

More recently, RD 28/2018 stated that all non-labour traineeships (i.e. without a labour contract), whether subject to economic compensation or not, must be registered with the social security authorities and pay social security contributions; yet, the development of the regulation is pending (foreseen for the end of 2022), so there is no register of non-labour traineeships. The most recent labour market reform (RDL 32/2021) has modified the traineeship labour contracts by: reducing the length of the contracts (from a maximum of two years to a maximum of one year); making compulsory that the traineeship contract is supervised by a qualified tutor (it was not the case before); reinforcing the need for individual training plans to be designed; and, significantly increasing the sanctions in cases of misuse of traineeship contracts. RD 32/2021 was enacted on 30 March 2022 and regulation of training content is pending. It is foreseen that a Trainee Statute (Estatuto del Becario, for university students) will be negotiated with social partners and youth organisations (Youth Council) and agreed upon in 2022.

ALMP traineeships

ALMP traineeships in Spain are not articulated through labour contracts, so they are called non-labour traineeships.

RD 1543/2011 governs traineeships that are aimed at young graduates (18-25, although older young people registered with the national system for the Youth Guarantee can also be targeted) with no or low employability due to lack of work experience. These traineeships need to be related to the qualification of the young graduated person and training providers that eventually hire these young persons can benefit from economic compensation for tutorship and monitoring costs. On the other hand, RD 694/2017 (article 24.3) regulates non-labour traineeships for unemployed persons registered with the PES. These traineeships are managed by national and regional PES²⁶⁶, that

²⁶⁶ While the legislation framework is defined at the national level, regional governments play a role in the implementation of ALMP-related traineeships as they manage regional PES. For example, in the region of Asturias, the maximum duration of a traineeship of

make the selection of young and older trainees respectively, in accordance with the needs of companies. The traineeships have to be part of training pathways subsidised by PES and be thus related to the previous training of the unemployed person.

3. Stakeholder views on traineeships

The views on traineeships differ among interviewed stakeholders. Although the QFT is not generally known, the debate on the quality of traineeships, in the context of precarious labour market for young people, has been intense in the last years.

There is a shared view among all interviewed stakeholders that it is positive to promote all types of traineeships as a measure that increases the employability of young people, trying to encourage companies to engage with the education system. However, beyond this consensus, the stakeholders interviewed expressed a range of different views.

Trade unions denounce the fraudulent use of traineeships, especially the use of traineeships to replace regular jobs. The **Spanish Youth Council, student representatives, the Labour Inspectorate** and also the **current government** are concerned about this issue. The latter explains the fact that the protection for trainees and reduction of abuse are explicitly mentioned in various recent official documents (e.g. the new Youth Guarantee Plus, the labour market reform).

While **employers** are in favour of good quality traineeships and against fraud and abuse, they reject the existence of a QFT at European level as a tool to promote quality, in the belief that European countries are very different in this respect and that it could work against companies as it may imply economic and bureaucratic costs. Neither the PES nor trade unions nor Youth Council share this view²⁶⁷. Employer representatives consider that companies will not be able to bear the economic and administrative costs of social security contributions of all non-labour traineeships (as it is being discussed for the Trainees' Statute -*Estatuto del Becario*). It is difficult however to estimate the cost per traineeship for employers. In addition to the economic compensation/wage and social security contributions of trainees, part of the cost for employers is the time devoted by a tutor to explain tasks to the trainee. The **administrative tasks involved (e.g. reaching agreements with PES or the university/training centre; managing available grants, etc.) are a burden, particularly for SMEs.**

Student representatives consider that traineeships are very important for the school-to-work transition. They are however concerned about quality issues of traineeships, including the use of traineeships to replace regular jobs. They are also concerned about the lack of traineeships in several fields of study, especially in arts and humanities. In this regard, they consider that **there is a need to find a solution to provide students with quality - but also enough - traineeships.**

Students consulted (focus group) shared this view, adding that in many fields of study a traineeship experience is almost a requirement to access a regular job in a concrete occupation. This concern explains why students do not demand quality standards for traineeships, as **they often prefer low quality traineeship before no traineeship at all.**

a registered unemployed (following RD 694/2017) is 250 hours, while in Aragón, it can be between 50 and 350 hours. The different characteristics regional labour markets may be behind the different needs of companies and trainees, reflected in the different conditions considered by regional governments. See, model of agreement between the regional PES and the training provider in Asturias at: <https://trabajastur.asturias.es/documents/36440/1046364/Convenioplal2021.doc/6b61c5a6-f812-26c5-ec04-3776087be825?t=1621511829580>

²⁶⁷ It should be taken into account that in the moment of elaboration of this case study social partners were carrying out negotiations for the Trainee Statute (*Estatuto del Becario*). This could have encouraged both, employer representatives and trade unions, to exaggerate their positions.

4. Actions taken in response to the QFT

Based on the information analysed for this report - including legislative texts, policy documents (for example, the ESF Operational Programme for Youth Employment), press notes from ministries and interviews - no evidence was found that any actions have been explicitly taken in response to the QFT in Spain. Nonetheless, as detailed in section 2, there have been changes regarding the regulation of traineeships since 2014, in particular in 2022 with the recent labour market reform (RDL 32/2021 – see Box 1 in the Annex) that modifies the traineeship labour contracts in line with QFT principles. As a result, Spanish **regulation complies with several QFT principles. However, in practice there are also many concerns regarding the implementation of the QFT and the actual quality of traineeships.**

As mentioned above, Spain did not take explicit actions in response to the QFT. Nonetheless, the national legal framework applicable to traineeships enshrines many QFT principles, both regarding OMT and ALMP traineeships, as set out below.

Open market traineeships (OMTs)

As noted above, OMTs are divided into two types: (1) labour traineeships and (2) extracurricular university traineeships. The degree of alignment with QFT principles of both types of traineeship is set out below.

(1) Labour traineeships

Alignment with the QFT: Labour traineeships are articulated through written labour contracts that have to be notified to the PES by the employer. The job post must be related with the studies or training in which the young worker has graduated (art 11.1.a RD 488/98), and knowledge, skills and competences acquired by the trainee recognised by the traineeship provider through a certificate that should state the duration, a description of the job post and the tasks performed (art 4 RD 488/98). However, traineeship providers did not have to assign a supervisor for the trainee until the recent labour market reform (RDL 32/2021), that now makes it compulsory.

Trainees with labour traineeship contracts are entitled to limits to maximum weekly working time, weekly rest periods and minimum holiday entitlements, since these contracts are subject to ordinary labour legislation, and also to full social security protection, including health and accident insurance and sick leave. The wage of the traineeship contract cannot be less than 60% or 75% of the wage of a similar worker²⁶⁸ in the company during the first and second traineeship year (article 11.2M of the Workers' Statute). The recent labour market reform states that the wage for the actual worked time shall be determined in collective agreements and shall not be below the statutory minimum wage.

Non-alignment with the QFT: The duration of labour traineeships used to be up to two years: the recent labour market reform has changed this limit to one year, thus still longer than recommended by QFT. However, if the trainee stays in the company after the completion of the traineeship, this cannot be as a trainee: thus the conditions for an extension or renewal of the traineeship are in line with QFT principles.

There is no specific regulation about the information on the conditions of the traineeships that traineeship providers should include in their vacancies.

With respect to regular follow-up and monitoring, labour authorities do not evaluate the effectiveness of labour traineeships contract and the impact on quality traineeships (they have been assessed once by scholars (de la Rica 2021, and Jansen 2018), but not on behalf of labour authorities). Labour authorities do however often discuss quality traineeships with employers' representatives, trade unions and other partners: indeed, the recent labour market reform was agreed with social partners. Yet no regular assessment or information on the compliance and impact on quality is yet established.

²⁶⁸ As defined by the collective agreement for a similar position than the trainee, without considering experience.

There are reporting mechanisms between providers and the PES, but these are not used to assess the quality of traineeships (although the labour inspection could intervene in cases of reported fraud or abuse).

(2) Extracurricular university traineeships

Alignment with the QFT: Extracurricular university traineeships involve written agreements (called Educational Cooperation Agreements) between the traineeship provider and the university, in which the relationship between the student, university and traineeship provider is stated. The content of the traineeship must be defined guaranteeing a direct relationship with the skills acquired during the trainee's university studies (art 6 RD 592/2014). The traineeship provider (first tutor) must prepare and give the university (the second tutor) an intermediate and final assessment; together with the trainee's assessment at the end, it will be the base for the acknowledgement and accreditation of the traineeship, according to the specific rules stated by the university. In order to ease EU mobility, a "European Supplement to the Degree" shall certify the traineeship (art 16, RD 592/2014).

The agreements for extracurricular traineeships for university students should clarify if the trainee is entitled to an economic compensation. Extracurricular university traineeships with an economic compensation are registered with the social security and enjoy full protection, with the exception of unemployment benefits. RD 28/2018 acknowledges this right also to trainees without an economic compensation, but it is not yet enacted. The education project that needs to be included in the Cooperation Agreement must specify the daily number of hours and time schedule.

Vacancies should include, as possible, the place where the traineeship takes place, the dates, the working time and training project (content, activities and skills to be developed) (RD 592/2014, article 17.4).

The duration of extracurricular university traineeships is recommended to be less than 50% of the academic year, which should be below six months, but this is still just a recommendation.

Non-alignment with QFT: There are no specific prescriptions for extracurricular university traineeships regarding the conditions for an extension or renewal in RD 592/2014.

According to a trade union, a youth council, student representatives and students consulted for this study, the difficulties that universities face in providing students with compulsory traineeships result in standardised and not very effective monitoring and assessment of the quality of traineeships.

ALMP traineeships

- **Alignment with the QFT:** Non-labour traineeships for young graduates are put in practice through two written agreements, as regulated in RD 1543/2011: one is signed by the traineeship provider and the PES, while the other is signed by the traineeship provider and the trainee. The first agreement sets up the framework conditions of traineeships in the company, while the second one complements this framework with concrete details of the traineeship to be performed by the trainee. The agreement must contain at least the specific content of the traineeship, duration, daily/weekly working time a timetable, the place, the tutorship system and the certificate that the person will receive. Trainees are entitled to cover for working accidents, sick leave, healthcare and retirement pensions, however, they do not contribute to unemployment benefits, the Fund of Guarantee of Salaries or training activities (Royal-Decree 1493/2011). All trainees must receive from the company an economic compensation of at least 80% of the IPREM (a reference standard for social benefits, which is EUR 579.02/month in 2022), to be negotiated through collective bargaining. Traineeship providers should provide the trainee a certificate with the training content, duration and period of the traineeship. PES should include these certificates in their information systems.

On the other hand, non-labour traineeships for registered unemployed engaged in training pathways, also managed by PES, involve a written agreement between the trainee and the traineeship provider and an agreement with the PES, whose content and conditions vary across regions, but would refer

to the traineeship duration, place and tasks²⁶⁹. In all cases, the traineeship must be linked to the training undertaken by the trainee and one or more tutors of the company should monitor and assess it. The duration of traineeships for registered unemployed varies across regions: for example, Asturias limits it to 250 hours (thus about three months based on daily working time of four hours), while Aragón limits it to 350 hours (thus about 4 months under the same conditions).

- **Non-alignment with the QFT:** The duration of ALMP-related non-labour traineeships for young graduates is three to nine months, thus longer than recommended in the QFT. There is also no information about how the young trainee or traineeship provider can terminate the traineeship, but the agreements between regional PES and companies (providers of traineeships for registered unemployed engaged in training pathways), would include some conditions for terminating the traineeships (in the mentioned example of Asturias, when the conditions agreed are no longer feasible, when the trainee signs a labour contract, among others).

Moreover, there are limitations in the information on the conditions of the traineeship in vacancies. The national and regional PES manage the vacancies posted by companies, and act as an intermediary with young people. Yet, this information is not readily available to candidates.

PES are responsible for monitoring and follow-up of ALMP traineeships in their respective regions. In the PES-Traineeship providers agreements, control and follow-up activities must be described so as to verify compliance with legislation and the improvement of trainee's employability. This said, there is no readily available information, at national level, on the traineeships managed by the national and regional PES. No official evaluations about effectiveness are available.

Summary

As described above, Spanish legislation is compliant with many of the QFT principles. However, **the duration of the traineeship** for both OMTs and ALMP traineeships and the lack of regulation regarding the **information on the conditions of ALMP traineeships in vacancies** are two of the **missing issues** in Spanish legislation.

Arrangements for effective enforcement and/or regular follow-up monitoring are also not sufficiently developed. Spain has not monitored either the delivery of the QFT, or the quality of traineeships. There is no official and regular statistic or registry data about the number of trainees according to the different types of traineeships that are defined by the Spanish regulations.

The Labour Inspectorate, belonging to the Ministry of Labour, is responsible for enforcing that traineeships (and all forms of work) comply with the current regulations. Therefore, it enforces that traineeships comply only with those QFT principles that are included in the Spanish Law (see above). **It should be noted that the QFT itself is not taken into account by civil servants in their inspection tasks**, unless the QFT principles are stated in Spanish Law, and often would not even know about the existence of the QFT.

Table 1 (see the Annex) summarises the alignment of both ALMP and OMT traineeships with the QFT principles.

²⁶⁹ See example of agreement form between regional PES and traineeship provider in the region of Asturias at <https://trabajastur.asturias.es/documents/36440/1046364/ConvenioPNL2021.doc/6b61c5a6-f812-26c5-ec04-3776087be825?t=1621511829580>

4.1 Implementation on the ground

As seen above, the national legal framework applicable to traineeships in Spain is aligned with most of QFT principles. However, our research shows that **concrete implementation of the QFT principles is lagging behind the legal framework.**

There are two main problems that have been mentioned by interviewed stakeholders and found in references. The focus group of students also revealed additional issues. These are described below.

Problem 1: Traineeships often replace regular entry-level jobs

There is evidence of traineeships replacing regular entry-level jobs for young people, as reported by the Labour Inspectorate. This concern is shared by other interviewed stakeholders, such as trade unions, student representatives or the Youth Council, who reported that some training companies would train young people (with PES subsidies) and provide non-labour traineeships in their own company; also, they would reach out to young people looking for traineeships, require them to register as unemployed and to register for a training course (no matter what, sometimes even with payment) and provide them with a low quality traineeship. The focus group with students also revealed this fraud, to the extent that some companies (called informally among them “*empresas cárnicas*” (meat companies)) are known in certain fields (such as ICT) for engaging young students as trainees, who actually develop mainstream tasks and replace regular workers.

Replacing regular jobs through traineeships is considered as fraud in Spain, and the issue is not new. The Supreme Court already focused on this problem in 1988. The Labour Inspectorate fights against this fraud through inspections, which involve court measures in many cases.

The main criterion to define that a traineeship replaces a regular job is the fact that **the traineeship provider (or employer) actually needs the work carried out by the trainee.** As reported by the Labour Inspectorate, other points to identify this fraud are:

- Trainees substitute regular workers, during their holiday period, or who are in sick or maternal/paternal leave. Traineeship vacancies might state this fact explicitly, as seen in this report;
- Trainees are able to carry out their work autonomously (i.e. do not require training);
- The lack of a credible training plan, or a training plan made up of tasks specific to the job, identified, for example, in the collective agreement;
- If the trainee is forced to enroll, or if there is a course that has been created ad-hoc for the traineeship;
- Wages being too high for a traineeship could suggest the existence of a regular job;
- When there is a high rotation of trainees, for example companies that regularly have a high share of trainees within their staff;²⁷⁰
- Activities with little qualification that do not allow specialised training;
- The lack of a tutor, or a tutor who is actually a manager.

However, this fraud does not mean that trainees do not learn or acquire skills, but that the trainee should be hired with a working contract, as s/he is actually performing the tasks of a regular job. Because of this, also in the belief that a traineeship is an asset when confronting a labour market

²⁷⁰ While high rotation of trainees per se may imply that the company's culture is prone to have good quality trainees when this point is combined, for instance, with tasks with little qualification, this could be a hint of fraud.

with very high youth unemployment rate, trainees would not denounce this situation. The Labour Inspectorate reported 1,193 cases in 2019 and 1,859 in 2020²⁷¹.

According to the Labour Inspectorate, the current regulation in Spain is too blurry and this is part of the problem. RD 1493/2011 stated that all trainees without a labour contract but with an economic compensation must be registered with the social security. This created the false image that traineeship rights are respected, no matter the quality of traineeship. Moreover, the blurry current regulation makes it more difficult for the Labour Inspectorate to identify whether there is a fraud or not, limiting its capability for enforcement.

In addition, according to most of the interviewed stakeholders, many employers in Spain do not have a corporate culture that considers the quality of traineeships as a relevant issue. Likewise, as identified during the focus group with students, most of trainees are not aware of their rights as trainees and usually do not know the differences between labour and non-labour traineeships and might consider as positive the experience of a traineeship that replaces a regular job, in the sense that they acquire skills through working experience. This is not unusual as nor the university, nor any other institution explain clearly these rights to them. The Labour Inspectorate is far away from university campuses. Still, students have often a feeling of unfairness about the conditions of their traineeships, such as long working hours, similar working conditions than regular workers of the same team (and half of the wage), carrying out the tasks of regular worker who are on holiday leave, or a lack of support from tutors. Some examples gathered during the student focus group for this study are set out below:

- **Example 1:** One trainee reported that during his/her traineeship the number of trainees in the company was higher than the number of employees.
- **Example 2:** One trainee reported that in his/her field (ICT) many companies are widely known for offering regular jobs as traineeships. In contrast, other ICT student had a very positive experience, with good tutoring and information, also provided by the university, and got eventually hired by the traineeship provider.
- **Example 3:** One trainee reported that in his/her field (translation) hotels are offering regular receptionist jobs as traineeships. Moreover, this trainee had a disability and the post was not adapted, nor was it modified when the trainee asked for it, making the experience more difficult.
- **Example 4:** In contrast with these experiences, one student (human health sector) reported that he/she was not allowed to carry out many tasks during his/her traineeships but just to observe how the tutor worked with patients.

Problem 2: The offer of traineeships is very limited

Most interviewed sources have reported that the offer of traineeships is very limited in Spain. Except in the case of technical universities, linked mainly to engineering, many students face difficulties to find quality traineeships. The pandemic made the situation even worse²⁷². Some factors have been identified that explain this:

- Employers find the regulatory framework complex and do not find the QFT principles suited to the high variety of situations in the Member States. They are concerned in particular about the administrative (having to register with social security) and economic costs (wage/economic compensation, social security contributions, tutors, etc.).

²⁷¹ [Memory of activities of the Labour Inspectorate. 2020](#). This is most recent memory published by the Labour Inspectorate to the date. Updates are available at the [link](#).

²⁷² Although curricular traineeships are not covered by this case study, it is worth mentioning that during 2020-21 some students could not even find curricular traineeships and thus were not able to graduate.

- Corporate culture in Spain. Many employers do not find the idea of offering traineeships attractive, considering trainees as a burden, unless they are regarded as regular (low-paid) workers, which points to Problem 1 (see above).

The limited offer of traineeships is also relevant for their quality. As reported by trade unions and the Youth Council, the scarcity of traineeship vacancies may lead universities to focus efforts on agreeing with companies a number of places and not so much on monitoring their quality. Likewise, for trainees the lack of traineeship offer reduces their demands on traineeship quality, especially in a context of permanent high unemployment rates.

It is not possible to assess the dimension of both problems due to the lack of statistical or registry information for traineeships. There are not regular surveys that aim to measure how many young workers are not able to find suitable traineeships either. The lack of a registry also limits the action of the Labour Inspectorate, who can only identify cases that are denounced.

Problem 3: The students do not feel supported by academic tutors or university

Students reported that academic tutors usually do not play an active role in ensuring the quality of their traineeships. They do feel that they can count on academic tutors if they encounter problems or issues during their traineeship experience. Some examples are set out below:

- **Example 1:** One student reported that he/she did not know who was his/her academic tutor.
- **Example 2:** One student with a visual disability asked for an adequate computer screen the traineeship provider, which was rejected. The student asked to be allowed to work from home, where he/she has an adequate screen. This was also rejected. After fighting with his/her traineeship provider he/she solved this issue, but without any support from his/her academic tutor.
- **Example 3:** Students often exaggerate the quality of their traineeship experiences in the report they must write for curricular traineeships, as they fear the university tutor could consider their traineeship experience, non-valid to graduate. Although this relates to curricular traineeships, it illustrates the climate at universities regarding the quality of traineeships, where students often regard to academic tutors as a danger rather than as a support.

Problem 4: Company tutors often do not have adequate teaching skills

Students reported that company tutors are usually regular workers who are not used to explain how they perform their tasks or teach trainees. Company tutors should receive training to enable them to acquire adequate training skills. This would also serve to raise their awareness of traineeship quality issues and trainee rights.

Problem 5: Some companies hire trainees as experts

Some employers hire trainees because they have certain skills that do not exist in the organisation. For example, hotels or tourist companies offer traineeships to translation students to translate texts or talk with customers in languages the tutor/other company employees do not even speak. Obviously these employers cannot provide quality training content to trainees.

4.2 Impact / influence of the Council Recommendation

The Council Recommendation has had limited observed impact in Spain. As mentioned above **there is no explicit reference to the QFT on regulations or policy documents in Spain**. The norms relevant to quality traineeships in Spain passed after 2014 (quoted in this report) do not mention the QFT. The ESF Operational Programme for Youth Employment, one the most relevant documents for youth employment policy in recent years, does not mention the QFT either, although it does mention other references to EU policies. The selection criteria of operations for the Youth Employment OP do not mention the QFT either. The intermediate evaluation of the Youth

Employment OP²⁷³ mentions the QFT as a guiding principle of the YEI, but does not provide further information about its impact or implementation.

Indeed, the **QFT is widely unknown among interviewed stakeholders in Spain**. Most of interviewed stakeholders had not heard about the QFT before, or barely did, but stated that most of their colleagues at their institutions do not know about it. **None considered that the QFT had an impact on Spain**.

Therefore, the changes in the legislation concerning the quality of traineeships since 2014 have not been directly due to the QFT Council Recommendation, but mostly to the various attempts to address (youth) labour precariousness and education quality.

5. Key evaluation findings

5.1. Effectiveness

As mentioned previously (see section 2.3), the QFT has not influenced directly national legislation or policies in Spain. **The QFT is not mentioned by norms or by main policy documents in Spain since 2014**. Norms reviewed in this report, such as the RD 592/2014 (passed in July of 2014 after the EQFT Recommendation), the RDL 28/2018 or more recently the RD 32/2021 (labour market reform) do not mention the QFT. The ESF Operational Programme for Youth Employment does not mention the QFT either, although it does mention other references of EU policies, as usually Spanish Operational Programmes do, such as the European Pillar of Social Rights or CSRs. Moreover, the QFT is widely unknown among interviewed stakeholders in Spain, and none considered that the QFT had an impact in Spain.)

Despite this, Spanish legislation is aligned with many of the QFT principles (see section 4)

However, as described above (see section 4.1) **there are problems in implementation in practice**. First, there is evidence of traineeships replacing regular entry-level jobs for young people (a fraud) as reported by the Labour Inspectorate and most of interviewed agents. Second, the offer of traineeships is very limited. Both problems are influenced by the precariousness of youth employment in Spain, as well as by a blurry legislative framework and by the corporate culture in Spain. Student representatives consider that many employers do not appreciate the added value of trainees, considering traineeships as a burden.

The Council Recommendation has had no observed impact in Spain and therefore it cannot be considered effective. Issues such as the replacement of regular entry-level jobs by traineeships, are not new²⁷⁴, and can by no means be considered as a negative effect of the QFT, but also there is no evidence that the QFT contributed to improve this situation. Due to this lack of impact of the QFT it cannot be argued that there have been sectors or (social) groups of young people for whom the QFT has been particularly successful or unsuccessful. Interviewed stakeholders point to the existence of fraud in all education levels, from university graduates in traineeships in big corporations to low-qualified jobs.

Cross-border traineeships were not mentioned as an issue in Spain by stakeholders.

²⁷³ https://www.mites.gob.es/uafse/ficheros/evaluacion/informes/poej/iae/inf_ev2018_iej.pdf

²⁷⁴ As mentioned above this issue reached the Supreme Court already in 1988.

There are **no actions to follow-up the application of QFT principles** in Spain. There is no regular sound assessment of the quality of traineeships at the national level either. This is linked to governance issues, as indeed there is not a reference institution at the national level that has the mission of ensuring, promoting or at least monitoring the quality of traineeships. Although each regional PES is responsible for ALMP traineeship quality monitoring, the external academic evaluations indicate that the monitoring system is not sufficient as it does not focus on traineeship quality as it should.

The QFT principles are not directly enforced in Spain. Enforcement in Spain is carried out by the Labour Inspectorate and limited to the Law, which does not acknowledge the QFT per se.

The low effectiveness of the QFT may be due to its status as a recommendation. A compulsory QFT would probably have been much more effective. This could have been done at least through EU schemes such as the Youth Guarantee. However, the critical level of youth unemployment rates, especially in the first half of the last decade when the QFT was published, explains that the priority was to create traineeships (or jobs) for the young, rather than ensuring the quality of traineeships.

5.2. Efficiency

Available data and literature do not enable to quantify the costs of the application of the QFT.

Views on efficiency differ among interviewed stakeholders. Employer representatives consider that companies will not be able to bear the economic and administrative costs of social security contributions of all non-labour traineeships. **Student representatives** consider that employers underestimate the added value of trainees, who can for example promote innovation and digital skills within some companies. Labour Inspectorate considers that traineeships are in fact used by employers to reduce the labour costs of regular jobs.

Beyond obvious costs, such as wages or social security contributions, **one of the main costs is probably the time needed by staff to teach and guide trainees**. This is regarded as an investment by some companies and as a cost by others. Interestingly, students from engineer studies enjoy a larger (and better quality) offer of traineeships. STEM companies might find the time spent in trainees as an investment mainly because of two reasons. First, the unemployment among STEM graduates is much lower (and therefore the difficulty for companies to find talent). Second, STEM studies are probably much more applied compared to other fields, which could increase the added value for employers from recently graduated trainees. Therefore it should be considered that **the efficiency of the application of QFT for interviewed stakeholders might differ across fields of study**.

It is difficult to assess the cost of providing traineeships from an employers' perspective. One approach can be through considering the subsidies available to companies. For example, as mentioned above, one call for grants offered to employers for non-labour traineeships funded through the Youth Guarantee in November 2020 provided between EUR 695 and EUR 811 monthly to employers, equal to 1.2 or 1.4 times the IPREM²⁷⁵, for persons without and with disabilities respectively. Employers who received grants must pay a wage equal to 80% of IPREM and social security contributions and justify the training content of traineeships ([Order of 17th November 2020 ICT/1095/2020; Article 7](#)). It is doubtful that this grant covers all traineeship costs for employers e.g. it does not cover the allocation of additional time to explain tasks to the trainee, administrative tasks to be done by HR or administration departments. Likewise, the recent labour market reform is very clear regarding the rights of trainees and the duties of supervisors/tutors (as employers). However, it does not acknowledge or regulate the implications that tutorship has for tutors (who are usually company employees) in terms of skills they should have or the workload (for instance the risk that

²⁷⁵ A standard for social benefits.

tutorship tasks might imply additional working hours for tutors). Another example of quantification is the case of registered unemployed engaged in training pathways, where training providers can receive up to EUR 6 per traineeship hour and per trainee, aimed at covering the tutorship, insurance and other costs.²⁷⁶

5.3. Coherence

The QFT is coherent with youth employment policies in Spain, including the Youth Guarantee, implemented through the ESF OP of Youth Employment, which plays a relevant role.

The main objective of youth employment policies over the last years has been to reduce high youth unemployment. The approach to reduce youth unemployment has been first to reduce early school-leaving rates, mainly promoting VET, and second providing to all graduates, both VET and university ones, better skills, in line with labour market demands, to increase their employability and ease school-to-work transition. For this, traineeships have been regarded as a positive measure.

However, as mentioned above, there are two main problems regarding traineeships in Spain: traineeships that replace regular jobs and a limited offer of traineeships. The combination of both problems is a conflict for policy. From one perspective, it is claimed that regulation should be more severe to ensure the quality of traineeships, or even forbid non-curricular traineeships to avoid potential fraud. This position is argued by trade unions in the current debate. From another perspective, a stricter regulation raises the concern that it could reduce an already limited traineeship offer. This position has been shared among students' representatives, who demand quality traineeships but also consider very important the existence of a sufficient traineeship offer.

5.4. EU added value

There is no evidence of the added value of the QFT, which could be considered as low. There is no evidence that the QFT has led to more quality traineeships (volume effects). In fact, there is no data regarding the quality of traineeships. The QFT has not broadened the focus of existing measures to include new areas or target groups (scope effects). Indeed, those furthest away from the labour market, such as NEETs that have been inactive for several years, are usually encouraged to enrol into education programmes rather than in traineeships by programmes such as Youth Employment OP.

The QFT has not led to structural changes in employment/education/training policy or frameworks (role effects). ESF Operative Programme for Youth Employment, which can be considered one of the most important programme in this field in the recent period, does not mention the QFT, nor interviews to the Managing Authority of Youth Employment OP regard the QFT as an instrument that has guided the implementation of the programme.

There is also **no evidence of the benefits to organisations implementing frameworks or delivering traineeships from being involved in QFT implementation** (process effects).

In the short-term there would be no likely consequences of discontinuing the QFT at EU level in Spain. Still, **the existence of a shared reference framework is useful to assess the quality of traineeships in all countries** and helps to highlight current quality limitations. Moreover, **the lack of EU added value does not mean a lack of relevance**, which can be considered high, as argued below in section 3.5. The potential EU-added value of the QFT in the future is indeed high as it could provide to young trainees a common framework for traineeships across Europe, making transnational mobility easier. To achieve this, the QFT should be strengthened in the future. This could be done by ensuring that MS apply the Quality Framework defined at the EU level rather than

²⁷⁶ In this case, the monthly amount granted would be of EUR 480 for a working time of 4 hours/day, but without the obligation of paying a compensation (as in RD 694/2017).

limiting it to a recommendation. Likewise, ESF and YEI frameworks, defined by the EC, have not been successful in ensuring that OPs, such as Youth Employment OP, actually implement the QFT.

The main weakness of the QFT in the Spanish case is not its content but its form. Its status as a recommendation and the lack of enforcement explains its limited impact. However, its enforcement could also reduce the offer of traineeships, as underlined by both employers' and students' representatives. Thus, in addition to enforcement, also support measures are needed. These may include, for instance, support to employers and awareness raising measures to change corporate culture of companies.

5.5. Relevance

QFT principles are relevant appropriate for getting young people into sustainable and quality employment in Spain.

A particularly important principle is that **tasks allow the trainee to work towards their learning and training objectives**. In Spain, the contents of educational programmes do not generally include all the skills needed in the labour market and education is often criticised because it does not sufficiently match labour market demands. Some of these skills, the so-called soft skills, are also becoming more relevant for employability in a more digitalised labour market. Therefore, the acquisition of practical skills is very relevant to increase the employability of young workers and thus facilitate their transition from education to employment. In this regard, the **recognition of the knowledge, skills and competences** acquired by the trainee through an assessment and a certificate (as recommended by the QFT) is very relevant and goes in line with the new approach of micro-credentials (currently promoted by the reforms of the VET and university system). Indeed, the approach of the QFT is very relevant for the understanding of traineeship quality by trainees, employers, PES or decision makers, which indeed has not evolved over time.

The limited duration of the traineeship (not to exceed six months, except when justified, according to QFT) is particularly relevant in Spain, where the use of temporary and precarious working schemes for the young has been an issue for many years, including the use of traineeships to replace regular jobs. This time limitation promotes that traineeships are used for learning and training objectives rather than to replace regular jobs²⁷⁷.

It is very relevant as well that traineeship providers include in their vacancies **information on the conditions of the traineeship**. The information shown in traineeship offers is often scarce. This information typically includes the company name, the post name, duration and related studies, but it does not often include information about the tasks or the learning content. One student even reported that he/she applied for a traineeship in one company, was accepted but finally was offered a different traineeship in a different company of the same holding.

Moreover, the **careers guidance services for students are very limited**, and usually young people do not turn to the PES.

Finally, the existence of **effective monitoring** is very important given the lack of available information about the quality of traineeships in Spain. Likewise, the existence of **effective enforcement** is just essential to tackle the use of traineeships to replace regular jobs. According to the Labour Inspectorate and to most sources, the prevalence of the use of traineeships to replace regular jobs is widespread. The limitations of current enforcement mechanisms do not allow to identify a high number of cases. The Labour Inspectorate is not entitled to carry out random inspections to companies to check whether traineeships are used to replace regular jobs, but can only investigate companies in response to a complain. However, students are often reluctant to

²⁷⁷ However, this is not the ultimate solution as traineeships can in fact also be used to replace regular jobs for just six months.

complain as they do not know their rights, where to complain and often accept illegal traineeship conditions due to lack of traineeship offer and the value they give to (even low quality) traineeships for school-to-work transition.

The pandemic has not modified the relevance of QFT principles to socio-economic needs and problems described above.

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UGT (trade union), 2020, Study on Fraud on non-labour traineeships, https://www.ugt.es/sites/default/files/estudio_sobre_el_fraude_en_las_practicas_no_laborales.pdf

Web resources

Additional documentation found in university web pages containing processes to assess quality of traineeships (curricular and extracurricular):

<http://deva.aac.es/include/files/deva/informes/resultados/INFORME%20SOBRE%20LAS%20PRACTICAS%20EXTERNA%20OBLIGATORIAS.pdf?v=2019827526>

https://www.eii.us.es/docs/secretaria/informe_final_empresa.pdf

<https://www.eii.us.es/docs/secretaria/encuesta-final-estudiante.pdf>

https://www.unia.es/images/micrositios/calidad/masters/P03_Procedimiento_Practicas_Externas.pdf

Statistical sources

Eurostat. Labour Force Survey.

National Public Employment Service (SEPE), Statistics on contracts (Estadística de contratos), several years.

Social Security: Data on affiliation to the social security (persons registered with the social security), including trainees with an economic compensation.

List of interviewed stakeholders

RUGE UGT trade union

CEOE, employers' association, Director of Education and Training Department, CEOE

Spanish Youth Council

National Public Employment Service (SEPE)

Labour Inspectorate, belonging to the Ministry of Labour and Social Economy,

UAFSE (Managing Authority of the ESF in Spain), belonging to the Ministry of Labour and Social Economy

CREUP (Platform of representatives of students from public universities)

Focus Group:

A focus group was carried out online on 12 September 2022. The group included three students who reported on their traineeship experiences. All of the students had university education. In addition to the group, a fourth student who could not eventually attend the online meeting was interviewed. The names and gender of participants are not reported due to privacy issues.

Annex

Box 1. Regulations in Spain relevant to quality traineeships (1998-2021)

Regulations in Spain relevant to quality traineeships (1998-2021)

- **RD 488/1998.** Royal Decree 488/1998, of March 27, which develops article 11 of the Workers' Statute regarding training contracts²⁷⁸.
- **RD 1493/2011.** Royal Decree 1493/2011, of October 24, which regulates the terms and conditions of inclusion in the General Regime of the Social Security of people who participate in training programs, in development of the provisions of the third additional provision of Law 27/2011, of August 1, on update, adaptation and modernization of the Social Security system²⁷⁹.
- **RD 1543/2011.** Royal Decree 1543/2011, of October 31, which regulates non-labor practices in companies²⁸⁰.
- **RD 592/2014.** Royal Decree 592/2014, of July 11, which regulates external academic internships for university students²⁸¹.
- **RDL 28/2018.** Royal Decree-Law 28/2018, of December 28, for the revaluation of public pensions and other urgent measures in social, labor and employment matters²⁸².
- **RD 694/2017.** Royal Decree 694/2017, of July 3, which develops Law 30/2015, of September 9, which regulates the Vocational Training System for Employment in the workplace²⁸³.
- **Order TMS/368/2019,** of 28 March, that develops RD 694/2017, that develops Law 30/2015, of September 9, which regulates the Vocational Training System for Employment in the workplace²⁸⁴.
- **RDL 32/2021.** Royal Decree-Law 32/2021, of December 28, on urgent measures for labor reform, the guarantee of employment stability and the transformation of the labor market²⁸⁵ (the last labour market reform).

Table 5. Summary of QFT principles enshrined in Spanish legal framework by type of traineeship

QFT Principle	OMT	ALMP
Traineeships based on written agreement	Fully/mostly compliant	

²⁷⁸ [Real Decreto 488/1998, de 27 de marzo, por el que se desarrolla el artículo 11 del Estatuto de los Trabajadores en materia de contratos formativos.](#)

²⁷⁹ Real Decreto 1493/2011, de 24 de octubre, por el que se regulan los términos y las condiciones de inclusión en el Régimen General de la Seguridad Social de las personas que participen en programas de formación, en desarrollo de lo previsto en la disposición adicional tercera de la Ley 27/2011, de 1 de agosto, sobre actualización, adecuación y modernización del sistema de la Seguridad Social.

²⁸⁰ Real Decreto 1543/2011, de 31 de octubre, por el que se regulan las prácticas no laborales en empresas.

²⁸¹ Real Decreto 592/2014, de 11 de julio, por el que se regulan las prácticas académicas externas de los estudiantes universitarios.

²⁸² Real Decreto-ley 28/2018, de 28 de diciembre, para la revalorización de las pensiones públicas y otras medidas urgentes en materia social, laboral y de empleo.

²⁸³ Real Decreto 694/2017, de 3 de julio, por el que se desarrolla la Ley 30/2015, de 9 de septiembre, por la que se regula el Sistema de Formación Profesional para el Empleo en el ámbito laboral.

²⁸⁴ Orden TMS/368/2019, de 28 de marzo, por la que se desarrolla el Real Decreto 694/2017, de 3 de julio, por el que se desarrolla la Ley 30/2015, de 9 de septiembre, por la que se regula el Sistema de Formación Profesional para el Empleo en el ámbito laboral, en relación con la oferta formativa de las administraciones competentes y su financiación, y se establecen las bases reguladoras para la concesión de subvenciones públicas destinadas a su financiación.

²⁸⁵ Real Decreto-ley 32/2021, de 28 de diciembre, de medidas urgentes para la reforma laboral, la garantía de la estabilidad en el empleo y la transformación del mercado de trabajo.

Written agreements indicate educational objectives, working conditions, whether an allowance or compensation is provided and how much, rights/obligations of all parties, duration		
Tasks allow the trainee to work towards their learning and training objectives		
Trainees' rights and working conditions under applicable law are respected including - limits to max weekly working time, weekly rest periods, minimum holiday entitlements		
Traineeship providers clarify if they provide trainees with: - health and accident insurance - sick leave		
The written agreement clarifies if the trainee is entitled to an allowance or compensation, and the amount.		
The knowledge, skills and competences acquired by the trainee are recognised by the traineeship provider through an assessment and a certificate.		
Traineeship providers assign a supervisor for the trainee	Partially compliant	Fully/mostly compliant
The conditions for an extension or renewal of the traineeship are clarified.		
The written agreement includes information on how the trainee/ traineeship provider can terminate the traineeship	Fully/mostly compliant	N/A – no information
Existence of effective enforcement and/or regular follow-up monitoring	Partly applied	Partly applied
The duration of the traineeship does not exceed six months, except when justified.	Non-compliant	Partially compliant
Traineeship providers include in their vacancies information on the conditions of the traineeship.	Partially compliant	N/A – no information

Source: Mapping matrix.

Annex 4: Consultation synopsis report

1. Outline of the consultation strategy

This document provides a synopsis of the stakeholder consultations conducted for the study supporting the evaluation of the Quality Framework for Traineeships (QFT). The consultation strategy for the study was developed on the basis of the Evaluation Roadmap.¹ The Roadmap indicates that the **aim of the consultation activities** is to collect relevant data and/or opinions from key stakeholders, in order to gather a meaningful picture of the state of play and evidence base, to inform the evaluation work. More specifically, the consultations focused on the extent to which the QFT principles have been adequately implemented across the Member States; the QFT principles and the nature of the QFT remain fit for purpose, and are adapted to a post-COVID-19 world and to a changing labour market. Furthermore, the consultations explored potential additional elements that would have an impact on the quality of traineeships and that are currently absent from the QFT; as well as the extent to which traineeships and the QFT implementation have had an impact on youth employment, and on young people and society at large.

A wide range of **stakeholders** were involved in the consultation process, including national and regional authorities responsible for education and training, and employment policies; social and economic partners; education and training providers; organisations representing young people and young trainees; former, current and potential future trainees; as well as other relevant stakeholders at European, national, regional level; and the general public.

To adequately reach these stakeholders, different consultation **activities and methods** were used:

- A **public consultation**, including position papers submitted by organisations responding to the public consultation;
- Targeted consultations, including:
 - Interviews with stakeholders on the EU and national level.
 - Case studies of seven countries² which also included additional consultations with key stakeholders in the form of in-depth interviews and, three focus groups in Bulgaria, Ireland and Spain.
 - An internet-based survey targeting former, current, and potential future trainees.
- **Other targeted consultations** including an expert meeting and a validation workshop to gather the views of selected consultees on the key findings on all evaluation criteria, and discuss lessons learnt.

2. Overview of consultation activities

The evaluation roadmap was open for consultation for four weeks between 28 July 2021 and 25 August 2021, with the aim of gathering the views of relevant stakeholders on the Commission's understanding of the problem and possible solutions and to share any relevant information that they may have on the implementation of the QFT and on traineeships.

The main aim of the **public consultation** was to provide an open channel for all interested stakeholders to provide their input. The consultation took the form of an e-survey with closed and

¹European Commission, <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13118-Quality-Framework-for-Traineeships-review-evaluation- en>

² Austria, Bulgaria, Greece, Ireland, Italy, Lithuania, Spain.

open questions, addressing the key evaluation criteria and tailored to the different stakeholder groups. The public consultation was open for 12 weeks from 21 March 2022 to 13 June 2022.

The **targeted consultations** aimed to gather more detailed input from stakeholders involved in the implementation of the QFT in different capacities. The targeted consultations consisted of five main sub-activities as described in the following sections.

Targeted interviews with EU and national level stakeholders focused on two key stakeholder groups: EU level stakeholders directly and indirectly linked to the education, training, and employment policies; and national level stakeholders responsible for education and training, skills, and employment policies (these included primarily Ministries of Employment and/or Social Affairs and Ministries of Education, as well as other stakeholders such as national-level socio-economic partners and youth or civil society organisations representing young trainees). The targeted semi-structured interviews were conducted from February 2022 to June 2022.

A selection of seven **case studies** were conducted as part of the evaluation research. As part of the case studies, additional in-depth interviews were conducted with representatives involved in the implementation and monitoring of the QFT, as well as three **focus groups** with young people/trainees. The case study interviews and focus groups were conducted from March to July 2022.

An **internet-based survey** was conducted. The survey targeted current, former and potential future trainees to gain an understanding of their experience and/or expectations of quality traineeships.

An **ex-ante expert meeting** was held online on 26 April 2022 to gather the views of selected consultees on preliminary findings on all evaluation criteria, identify examples of good and bad practices, and discuss ways forward to foster the implementation of the QFT, and quality traineeships more broadly, across the EU. Consultees included representatives of national authorities in charge of traineeships (i.e., Ministries of employment, social affairs and/or education); Public Employment Services; as well as representatives from social partners, and EU level civil society organisations and experts.

A **validation workshop** was held on 20 September 2022 as a final consultation activity to validate the study findings and for selected consultees to share their views on lessons learned and next steps. Consultees included representatives of national authorities in charge of traineeships (i.e., Ministries of employment, social affairs and/or education); Public Employment Services; as well as representatives from social partners at the EU and national level, and EU level civil society organisations.

2.1. Summary and reflection on challenges

The consultation methods were implemented as planned, in line with the agreed consultation strategy. The targeted interviews posed some challenges, such as delays due to the unresponsiveness of a number of national level stakeholders. Moreover, some national level stakeholders felt that they did not have the relevant expertise to contribute to the study. The impact of this on the consultation strategy was minimal, however, as the other targeted consultations conducted allowed the research team to still gather in-depth views of a range of stakeholders across the EU27.

3. Information on consultation activities and stakeholder groups consulted

All relevant stakeholders as identified in the evaluation roadmap were consulted through the consultation activities, as set out in Table 1.

Table 1 - Overview of stakeholders consulted in all consultation activities

Type of stakeholder	Public consultation	Evaluation roadmap	Targeted interviews	Trainee survey	Case studies	Expert meeting	Validation workshop
Ministries and institutions responsible for education and training policy	X	X	X		X	X	X
Ministries and institutions responsible for employment policies	X	X	X		X	X	X
Public Employment Services (PES)	X	X	X		X	X	X
Social and economic partners at national and EU level	X	X	X		X	X	X
Education and training providers	X	X	X		X		
EU level institutions/policymakers	X	X	X			X	X
Organisations representing young people and/or young trainees	X	X	X			X	X
Current, former, and potential trainees	X	X		X	X		
Research /academia and other international organisations	X	X	X		X	X	X
EU citizens	X	X					

3.1. Evaluation Roadmap

The evaluation roadmap targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national and EU level (trade unions and employer organisations); education and training providers; EU level institutions and policymakers; organisations representing young people and/or young trainees; current, former, and potential trainees; research /academia and other international organisations; and EU citizens. This consultation activity did not focus on any of the five evaluation criteria specifically, but rather aimed to gather feedback on key challenges and potential solutions related to the implementation of the QFT and quality traineeships.

The total number of respondents to the consultation on the evaluation roadmap was two from academic and research institutions.³

³ European Commission, Quality Framework for Traineeships review (evaluation): https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13118-Quality-Framework-for-Traineeships-review-evaluation/feedback_en?p_id=26017674

3.2. Public consultation

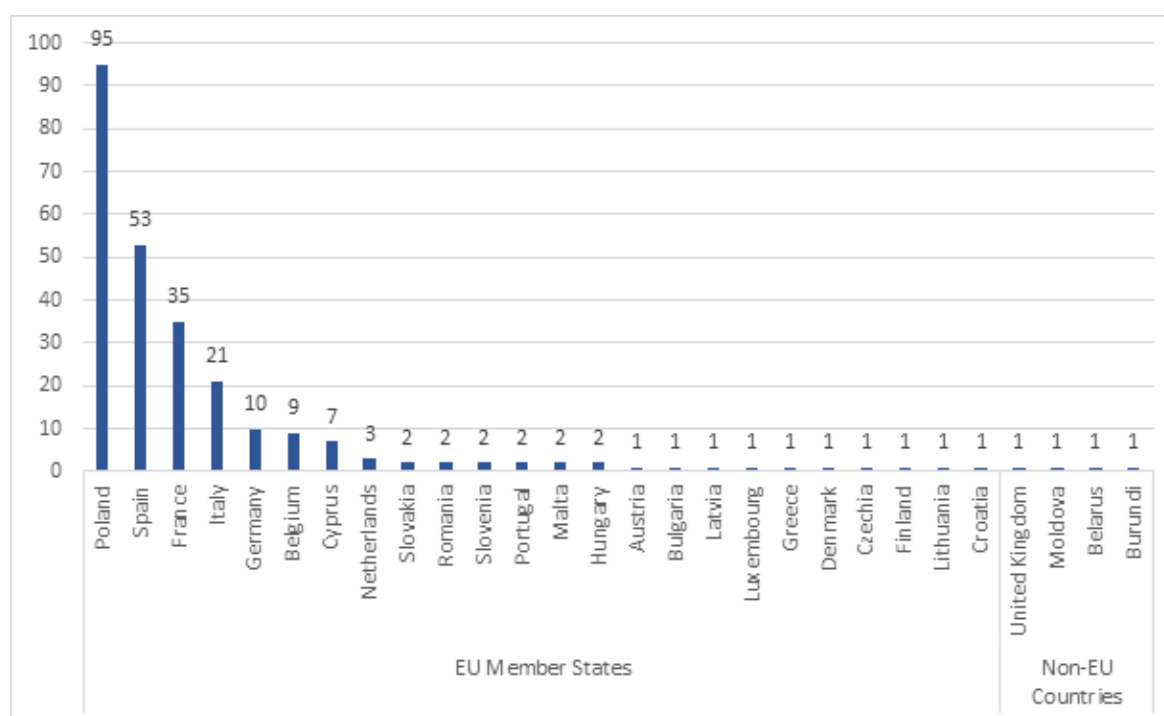
The public consultation targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national and EU level (trade unions and employer organisations); education and training providers; individual traineeship providers; EU level institutions and policymakers; organisations representing young people and/or young trainees; current, former, and potential trainees; research /academia and other international organisation; and EU citizens.

The public consultation included questions on effectiveness, efficiency, relevance, coherence, and EU added value, as well as questions on possible ways forward regarding quality traineeships.

The number of responses to the public consultation was 259. This included 169 listed organisations (65%), 70 individuals (27%), and 20 respondents representing groups other than those listed. Respondents were from 24 EU Member States and 4 non-EU countries. 89% (230 out of 259) of responses were received from seven of the 29 countries represented, showing a somewhat unbalanced geographic distribution of responses. These seven countries are Poland (95), Spain (53), France (35), Italy (21), Germany (10), Belgium (9) and Cyprus (7).

Figure 1 shows the number of responses from each country represented in the public consultation.

Figure 1. Breakdown of respondents by Member State



Source=QFT Public consultation 2022, N=259

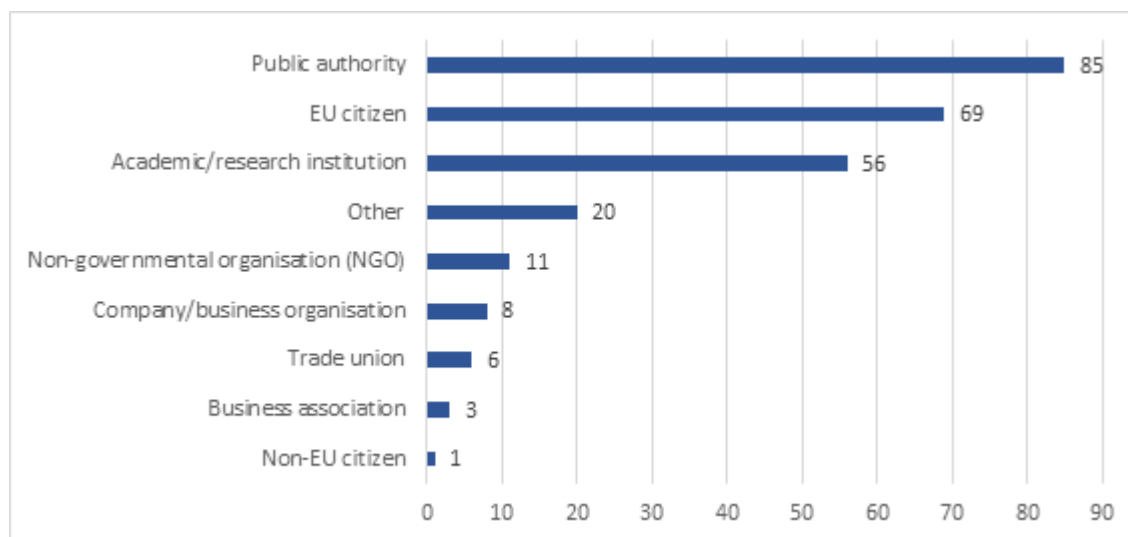
In terms of the type of respondents, the public consultation targeted the following main groups:

- Group A – Public authorities: national and regional ministries involved in employment, training, education, and labour market policies; public employment services;
- Group B – Economic and social partners: trade unions and employer organisations;
- Group C – Individuals: EU and non-EU citizens;

- Group D – Civil society organisations: NGOs, organisations representing young people/trainees
- Group E – Academic and research institutions

The **largest group of respondents was public authorities** (85 out of 259, 33%), with the majority of the authorities representing employment services (64 out of 85, 75%), and the remainder representing national, regional and local public authorities (12 out of 85, 14%), government bodies or ministries (7 out of 85, 8%), and training or education institutions (2 out of 85, 2%). The second largest group of respondents was EU citizens (69 out of 259, 27%), followed by academic/research institutions (56 out of 259, 22%) and those who indicated they belonged to a group not listed in the questionnaire (20 out of 259, 8%). The remaining respondents represented NGOs (11 out of 259, 4%), companies/business organisations (8 out of 259, 3%), trade unions (6 out of 259, 2%), business associations (3 out of 259, 1%) and a non-EU citizen (1 out of 259, 0.4%). Figure 2 provides a breakdown of respondents by main stakeholder groups.

Figure 2. Breakdown of respondents by main stakeholder groups



Source=QFT Public consultation 2022, N=259

3.3. Targeted interviews with EU and national stakeholders

The interviews targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national and EU level (trade unions and employer organisations); education and training providers; individual traineeship providers; EU level institutions and policymakers; organisations representing young people and/or young trainees; research /academia and other international organisations; and EU citizens.

The interviews included questions on effectiveness, efficiency, relevance, coherence, and EU added value, as well as overarching questions to investigate the current prevalence of traineeships, main characteristics of trainees, the public debate around the topic, as well as any relevant change since the adoption of the QFT.

A total of 124 interviews were undertaken. Of these, 17 were interviews with EU level stakeholders and 107 with national level stakeholders in all Member States.

Table 2. Targeted interviews completed

EU level		
Stakeholder	Number of interviews conducted	
DG EMPL (Units B3 and B1)	3	
DG EAC	1	
Eurofound	2	
Cedefop	1	
Association of European Chambers and Industry (EUROCHAMBERS)	1	
Business Europe	1	
European Trade Union Confederation (ETUC)	1	
European Confederation of Independent Trade Unions (CESI)	1	
IndustrialAll Europe	1	
European Youth Forum	1	
Fair Internship Initiative	1	
Interns Go Pro	1	
SPRINT project	1	
International Labour Organization (ILO)	1	
Total EU level interviews	17	
National level		
Type of stakeholder	Countries covered	Number of interviews conducted
National and regional ministries and government bodies responsible for employment or education policies	AT, BE, BG, CY, CZ, DE, DK, EE, EL, FI, FR, HU, IE, IT, LT, LV, MT, PL, RO, SI, SK	26
Public Employment Services (PES)	BE, BG, EE, ES, HR, IT, LT, LU, LV, MT, RO, SE, SI, SK	16
Employer organisations	AT, BG, CY, CZ, DE, DK, EE, EL, ES, FI, HR, HU, IE, IT, LT, LU, MT, NL, PL	22
Trade unions	AT, BG, CY, CZ, DE, EL, ES, FI, FR, HR, LU, LV, NL, PL, SI	16
Civil society/youth organisations	AT, BE, CY, EL, ES, FI, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, RO, SI	17
Other stakeholders (e.g., research institutes; education and training organisations, etc.)	AT, BG, HU, IE, LV, NL, PL, PT, RO	10
Total of national level interviews		107

Source: Ecorys, 2022

3.4. Case studies

The in-depth interviews and focus groups carried out in the framework of the case studies targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national level (trade unions and employer organisations); education and training providers; individual traineeship providers; organisations representing young people and/or young trainees; current, former, and potential trainees; research /academia and other international organisations; and EU citizens.

The in-depth interviews and focus groups carried out in the framework of the case studies included questions on effectiveness, efficiency, relevance, coherence, and EU added value, as well as overarching questions to investigate the current prevalence of traineeships, examples of good practices and/or potential misuses; the public debate around the topic, as well as any relevant change since the adoption of the QFT.

A total of 48 interviews and three focus groups (Bulgaria, Ireland, Spain) were conducted for the case studies, with stakeholders from the following categories:

- Ministries, governmental departments, and other public authorities responsible for employment and/or education and training policies
- Public Employment Services;
- Social partners (trade unions, employer organisations, chambers of commerce, chambers of employees);
- Civil society organisations, including youth organisations and youth representatives;
- Research institutions

3.5. Internet-based survey of trainees/potential trainees

The internet-based survey targeted current, former, and potential trainees. The survey focused on the effectiveness, relevance and EU added value of the QFT, through investigating target groups' experience with traineeships and their interest in and perceived challenges of undertaking traineeships, including cross border opportunities. For current and former trainees, the survey included questions on their background, their experience with finding a traineeship opportunity, as well as their working conditions, and the outcomes of their traineeship.

The trainee survey ran from 1 March 2022 to 25 March 2022 and a total of 3,814 responses were collected. Out of these, 1,836 (48.1%) were from respondents belonging to the core target group (i.e. 18-30 year olds with traineeship experience in EU Member States from 2014 onwards). The rest of the responses were as follows: 702 (18.4%) from respondents with no traineeship experience, 962 (25.2%) from respondents with only mandatory traineeship experiences, 65 (1.7%) from respondents with traineeship experience before 2014; 75 (2%) from respondents with traineeship experience from non-EU countries; 84 (2.2%) from respondents with traineeship experience in multiple EU countries and 90 (2.4%) from respondents with traineeship experience in the EU institutions.

3.6. Expert meeting

The expert meeting targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national and EU level (trade unions and employer organisations); EU level institutions and policymakers; organisations representing young people and/or young trainees; and research /academia and other international organisation.

The expert meeting investigated key questions on effectiveness, efficiency, coherence, EU added value and relevance, with a particular focus on national approaches to the implementation of the QFT.

The online expert meeting was attended by a total of 48 participants, 30 of these were representatives from 18 Member States (Austria, Croatia, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Ireland, Latvia, Lithuania, Malta, Netherlands, Poland, Romania, Slovenia, Spain). The remaining 18 were representatives from EU-level organisations (4), the European Commission (5) and the research team (8), and one non-EU participant.

3.7. Validation workshop

The validation workshop targeted the following stakeholder groups: national authorities responsible for employment, education and training policies; PES; social and economic partners at national and EU level (trade unions and employer organisations); EU level institutions and policymakers; organisations representing young people and/or young trainees; and research /academia and other international organisation.

The validation workshop investigated all evaluation criteria with questions and discussion on effectiveness, efficiency, relevance, coherence, and EU added value.

The online validation workshop was attended by a total of 49 participants, 29 of these were representatives from 15 Member States (Austria, Belgium, Bulgaria, Denmark, Estonia, Greece, Hungary, Italy, Lithuania, Malta, Netherlands, Portugal, Romania, Slovenia, Spain). The remaining 13 were representatives from EU-level organisations (7), the European Commission (5) and the research team (8). As a follow up to the validation workshop, three additional written contributions were received from EU level trade union (1) and EU level employer organisations (2).

4. Methodology for data processing

The feedback on the **evaluation roadmap** was conducted by carrying out a qualitative analysis of the responses to identify common trends and relevant insights.

For the **public consultation**, the analysis of results was carried out using both quantitative and qualitative methods. The quantitative data analysis included analysis of frequency distribution for each of the variables related to the closed-ended questions, and cross-tabulations between specific variables and characteristics of respondents and between specific variables, though the low number of responses has limited the possibilities for this. For the qualitative data analysis, information was classified by related variable (number of question) and analysed to identify additional information and trends.

For the **targeted interviews with EU and national level stakeholders**, the write-ups from the interviews were collected and exported into analytical grids, broken down by the different questions and by the respective evaluation criteria. The research team used the analytical grids to carry out an

in-depth analysis of the data to inform the relevant sections and annexes of the interim and final reports.

Information gathered from the **case studies interviews and focus groups** was used in the analysis of each country case study report. The case study reports were used to inform the analysis carried out by the research team for all sections of the final report.

The **trainee survey** was analysed using both quantitative (to analyse the frequencies of the closed answers) and qualitative methods (for the open questions, to analyse complex concepts and substantiate and interpret the quantitative data with relevant insights). The responses to the open-ended questions provided by the respondents in their native language were translated into English for better interpretation. Survey findings were used by the research team for all sections of the final report.

For the **expert meeting and validation workshop**, the outcomes of the discussions were collected in meeting reports drafted by the research team. These were used by the research team for all sections of the final report.

5. Overview of results of consultation activities

5.1. Effectiveness

National authorities responsible for education and training and employment policies, PES, social and economic partners at national and EU level (trade unions and employer organisations), EU and national level organisations representing young people and/or young trainees, and research /academia and other international organisations were all consulted on questions related to the effectiveness of the QFT, through the interviews, the public consultation, the case studies, the expert meeting and the validation workshop. While trainees were not directly asked about the effectiveness of the QFT, their feedback on their traineeship experience has been triangulated with the outcomes of the other consultation activities to assess the impact of the QFT.

The study showed that the **QFT principles have been implemented to varying degrees in national legislation** since 2014. This was confirmed by interviews with national authorities, trade unions and civil society organisations in particular, and by the legal review undertaken in the framework of the study. With regards to the implementation of the QFT on the ground, the majority (74%, 132 out of 178) of respondents to the public consultation representing organisations indicated that the traineeships they offer comply with the QFT to either a large or moderate extent. Among these, 100% of respondents from public enterprises (5 out of 5) reported that their organisation complied to a large degree with QFT principles, followed by the majority of civil society representatives (67%, 4 out of 6), 65% (40 out of 62) of respondents from employment services, and 33% (3 out of 9) of social partners. National authorities, youth organisations, and trade unions consulted during the interviews, the case studies, the expert meeting, and the validation workshop, however, highlighted several **elements that affect the implementation of the QFT on the ground**. These include lack of capacity of labour inspectorates or Public Employment Services (PES) to adequately monitor both open market and ALMP traineeships; lack of clarity with regards to the legal framework on and/or definition of open market traineeships leading to unclear roles and responsibility in relation to monitoring; different approaches to the involvement of trainees themselves in monitoring processes. On the other hand, interviewed **employer representatives** noted that excessive monitoring might discourage businesses from taking on trainees due to burdensome administrative and/or legal requirements or fear of sanctions (e.g., having to return subsidies received to offer traineeships).

In terms of the **impact of the QFT on trainees**, the responses to the trainee survey show a positive impact. The vast majority of respondents (70%, 1.285 out of 1.836) strongly agreed or agreed that they were involved in defining their learning objectives during the traineeship), with some disparities

depending on the education level at the time of the traineeship: for example, respondents with a tertiary or higher education level were more likely to strongly agree/agree when asked if they were involved in defining the objectives of the traineeship compared to those with lower secondary or below. Furthermore, 85% (1.561 out of 1.836) of trainees surveyed either strongly agreed or agreed that they acquired useful skills and knowledge through their traineeship, whilst 83% (1.524 out of 1.836) noted that they acquired real-life work experience. Trainees also saw positive progress in implementation of the QFT principles in their traineeships that can have a concrete impact on employability, with the majority of trainee surveyed stating they were involved in defining their learning objectives and that they had made progress towards achieving these objectives throughout their traineeship (70% or 1.285 out of 1.836, and 80% or 1.469 out of 1.836, respectively).

The public consultation, moreover, shows that half of all respondents (50%, 154 out of 259) reported that the **QFT helped young people move into stable employment** either to a large or moderate extent, with public authorities standing out as the respondent group more likely to report that the QFT helped young people to secure employment to a large extent (31%, 26 respondents out of 85) and to a moderate extent (48%, 41). Furthermore, evidence gathered through the interviews and case studies also found that participating in a traineeship has a positive effect on employability: in particular, national authorities, PES, employer organisations, trade unions, youth organisations, and representatives from other international organisations participating in the interviews and the case studies reported that, besides job-specific competencies, traineeships allow for the development of transversal skills (e.g., time management; organisational skills; team work; communication skills; self-confidence) that are key for young people entering the labour market. However, despite their positive impact on employability, these stakeholders overall agreed across all consultation activities that traineeships do not provide guaranteed access to the labour market. This is further confirmed by the results of the trainee survey, with the majority (58%, 1.065 out of 1.836) of respondents reporting they did not receive a job offer after their traineeships.

Evidence from the consultations points to **learning objectives and written agreements as the QFT principles that have a particularly positive impact** on fostering young people's stable labour market integration. EU and national level employer organisations and trade unions participating in the interviews, expert group, and validation workshop highlighted that traineeships are to be considered first and foremost educational experiences, and therefore underlined the importance of establishing learning objectives for trainees. Interviewed youth organisations, trade unions, and national authorities recognised the key role played by the written agreement in both ensuring transparency on rights and obligations and setting out learning objectives. In the public consultation, concluding a written agreement at the beginning of the traineeship was deemed as very important by the vast majority of respondents (77%, 200 out of 259).

With regards to **the impact of the QFT on sectors**, consulted stakeholders across all categories had limited views and/or knowledge on sectoral differences in relation to quality traineeships. For example, in the public consultation, 39% of respondents (69 out of 178) representing organisations responded that they did not know if the QFT had a positive impact in their sector. However, the trainee survey showed that respondents undertaking a traineeship in the financial and insurance sectors were more likely to report that they had been offered a job after their traineeship experience (60%), followed by those involved in the construction sector (56%). Conversely, respondents undertaking a traineeship in education, health and social work, and arts and entertainment, were the most likely not to have received a job offer following the completion of their traineeships (69%; 66%, 64%). Evidence from the interviews and case studies corroborates these findings as interviewed national stakeholders, employer organisations and trade unions noted that the media, social care, healthcare and arts sectors were more prone to precarious traineeships. Employer organisations particularly stressed that sectoral differences often are due to the different sizes of companies across sectors, with small and micro sized companies less able to guarantee quality traineeships given resource constraints.

In terms of the **impact of the QFT across social subgroups**, national authorities, youth organisations, trade unions, employer organisations consulted during the interviews, case studies, and the expert group reported that the QFT principles are less effective for vulnerable groups as they do not directly address the obstacles they face in accessing traineeship opportunities. These

stakeholders stressed that marginalised youth are less able to benefit from traineeships due to financial barriers to accessing traineeships (i.e., lack of financial compensation), or lack of specific measures to take into account intersectionality or address the challenges faced by specific groups (e.g. young people in rural areas; young people with disabilities; young people belonging to ethnic minorities). The trainee survey, moreover, revealed that trainees' own networks often play a key role in accessing traineeship opportunities, with 33% (606 out of 1.836) of respondents indicating that they had found their traineeship through their friend circle, acquaintances, or families. This can represent a disadvantage for more marginalised groups, as they may not have access to these networks.

Lastly, regarding **the extent to which the QFT has been effective in improving traineeship quality compared to the European Framework of Quality and Effective Apprenticeships (EFQEA)** on apprenticeship opportunities, EU and national level trade unions, youth organisations and employer organisations consulted through the interviews and the expert group considered that the EFQEA has had greater impact on quality. This is due to several factors including a more collaborative approach to apprenticeships, which generally see a higher level of cooperation between employers and education or training institutions as apprenticeships are embedded in education systems; a higher degree of regulation in apprenticeships and the fact that they are generally seen as employment contracts (as opposed to traineeships), which also resulted in the EFQEA having a clearer scope and more specific and concrete principles. Lastly, the establishment of the European Alliance for Apprenticeships (EAfA) was identified by interviewed EU level employer organisations, trade unions, and youth organisations as a success factors in promoting quality apprenticeships.

5.2. Efficiency

National authorities responsible for education and training and employment policies, Public Employment Services, social and economic partners at national and EU level (trade unions and employer organisations) and research /academia and other international organisations were all consulted on questions related to the efficiency of the QFT, through the interviews, the public consultation, the expert meeting and the validation workshop. Trainees were not asked about the costs of implementation of the QFT in the survey of trainees, given the fact that they are unlikely to have such knowledge. However, trainees and potential trainees were consulted on the benefits of traineeships and of QFT implementation through the survey of trainees and the case study focus groups.

Research activities undertaken for the study provided **limited evidence on the costs and benefits associated with the implementation of the QFT or quality traineeships**. However, qualitative information gathered through all stakeholders consultation activities identified the following **costs**:

- **Administrative costs for employers:** EU and national level employer organisations consulted through the interviews, public consultation, case studies, expert meeting and validation workshop highlighted some specific costs related to implementing the principles of the QFT. These included direct labour costs of identifying and training supervisors and certifying trainees' skills. National authorities consulted during the interviews and case studies and employer organisations and employers consulted during the interviews, case studies, and validation workshop noted that, while these costs are often subsidised or reimbursed, applying for financial support is costly in itself, and may represent a burden, particularly on small and medium companies with limited capacity. The majority of employer organisations and employers (7 out of 10, 70%) consulted in the public consultation agreed that there were administrative costs involved in implementing the QFT. 48% of all organisations responding to the public consultation (89 out of 184) pointed to administrative costs associated with the implementation of the QFT (i.e. paperwork, submission of reports, application of grants, cooperation with inspection by public authorities, etc.).

- **Adjustment costs national authorities:** Interviewees from national authorities mentioned costs incurred to adapt to the requirements of the QFT, including labour costs associated with designing and monitoring traineeship programmes, implementing new legislation in line with the QFT, investing in PES to monitor compliance; as well as costs associated with the provision of subsidies and grants. Moreover, 45% (37 out of 83) of public authorities representatives participating in the public consultation reported that there were costs associated with the QFT implementation – the highest share out of all groups of respondents.
- Furthermore, employer organisations and employers consulted during the interviews and case studies highlighted **other costs** associated with implementing **traineeships in general** which are not specifically required from the QFT, but are nonetheless a cost for implementing any type of traineeship in some countries. These include the costs of advertising traineeship opportunities, the costs of covering trainees with insurance against work accidents, and costs to cover a monthly allowance for trainees.

Measures introduced since the adoption of the QFT in 2014, and quality traineeships more generally, have been identified by all types of stakeholders consulted across all consultation activities as contributing to a range of benefits for young people, employers, and society. More than half of the organisations responding to the public consultation rated the benefits of implementing the QFT as quite high (44%, 77 out of 177) or very high (14%, 25 out of 177), with 47% of public authorities (37 out of 79) and 58% of academic/research institutions (32 out of 55) agreeing with this.

In terms of **benefits for young people**, trainees, national authorities, and trade unions mentioned reduced exploitation of trainees and, in turn, an increase in the number of quality traineeships as a clear benefit for youth during the interviews, and in responses to the trainee survey and to the public consultation. According to trade unions interviewed and consulted in the expert meeting and validation workshop, by establishing standards, particularly having a written contract that defines rights and obligations, the QFT has contributed to a higher level of protection for trainees. Employer organisations and individual employers consulted during the interviews, the case studies, the validation workshop and the public consultation confirmed these findings by identifying improved skills levels and skills recognition as a benefit. Lastly, 62% of trainees surveyed through the survey of trainees agreed that traineeships made their school-to-work transition easier. Similarly, EU level organisations interviewed and consulted during the expert meeting and validation workshop mentioned improved certification of skills as a clear benefit resulting in increased employability.

Turning to **benefits for employers**, national authorities consulted during the interviews argued that an improved understanding of the key features of quality traineeships is a direct benefit of the QFT as it allows businesses and PES to better structure their traineeship programmes. Employer representatives interviewed highlighted the reputational benefits of offering quality traineeships, which can result in higher number of skilled young professionals applying to work for them. They also commented that quality traineeships give employers the opportunity to assess the abilities of potential recruits without incurring in any major financial risk. Views of employer organisations and employers responding to the public consultation were also relatively positive, with 6 out of 10 (60%) reporting that the benefits of QFT were quite high and 2 out of 10 (20%) very high.

At **societal level**, all types of stakeholders consulted through all consultation activities, both at EU level and national level, mentioned the potential of quality traineeships to have a positive impact in the medium and long term, by **reducing youth unemployment and improving school-to-work transitions** through fostering young people's employability. However, national authorities interviewed stressed that the difficulties with isolating the specific effect of the QFT principles on traineeships make it harder to build a direct link between the QFT and broader societal impact.

The overall view of employer organisations and national authorities was that **costs linked with the QFT and/or quality traineeships are generally low whereas benefits, especially those expected to occur in the future, are potentially large**. However, national authorities in particular pointed out in the interviews that several factors can affect the cost-benefit ratio, including the fact that efficiency can only be achieved if the QFT results in quality traineeships, as low-quality opportunities would result in higher personal costs for trainees and lower benefit to employers.

5.3. Coherence

National authorities responsible for education and training and employment policies, Public Employment Services, and social and economic partners at national and EU level (trade unions and employer organisations) were consulted on questions related to the coherence of the QFT, through the interviews, the case studies, the expert meeting and the validation workshop. Given the specific national policy knowledge required to assess policy coherence of the QFT with national and EU policy, questions on coherence were not asked in the public consultation nor in the survey of trainees. This was a methodological choice to ensure both surveys remained short and relevant to the stakeholder groups concerned, so as to increase response rates, and in view of the fact that other consultation activities were able to gather sufficient evidence on this evaluation criterion.

National authorities, employer organisations, trade unions and youth organisations consulted through the interviews, the case studies, the public consultation, the expert group and the validation workshop overall agreed that there is a **good level of coherence between the QFT and relevant policies and strategies at national and regional level**. This overall coherence was considered to be largely due to a shared policy goal of providing young people with relevant, high-quality work experience and appropriate skills within a safe environment in which their rights are protected. However, stakeholders from national authorities highlighted in the interviews and case studies that there was generally a **greater degree of coherence with national and regional policy for ALMP traineeships than for open market traineeships**.

Moreover, factors contributing to good coherence include the following:

- **Implementation of the QFT principles prior to the adoption of the QFT:** in some Member States, national authorities consulted in the interviews and case studies considered that there is good coherence between national and regional policies and the QFT since the principles were already largely implemented prior to the adoption of the QFT, with some consultees (e.g. employers) suggesting that some national and regional policies go beyond the QFT principles.
- **Introduction of new policies to increase alignment:** in other Member States youth representatives and national authorities interviewed and consulted in the case studies considered that the introduction of new policies had led to improved coherence with the QFT.
- **The leverage of national and EU funding for traineeships:** interviewed stakeholders (national authorities, PES and youth organisations) stressed that national and EU funding (e.g. European Social Fund; Youth Employment Initiative) has been a driver for promoting coherence with the QFT, by supporting the implementation of QFT principles and bringing national and regional actors together to develop education and training, or employment measures.

Despite the overall positive feedback, a wide range of stakeholder groups consulted (national authorities, employer organisations, trade unions, youth organisations) also identified some **factors hampering or limiting coherence** with national and regional policies, including: lack of horizontal coordination mechanisms between policies and policy makers across relevant sectors (i.e., Ministries of education and employment); the relatively narrow scope of the QFT, which does not allow for cooperation between policymakers from different relevant fields; lack of harmonised vocational education and training systems which result in different quality criteria, monitoring procedures and approaches to work-based learning; lack of ambition of the QFT compared to other EU level instruments (e.g. European Pillar of Social Rights) or national and regional policies, which limits coherence as national and regional measures may be more advanced.

Furthermore, national authorities, EU and national level social partners and youth organisations consulted in the interviews, case studies and expert meeting shared the view that the QFT has a **good degree of coherence with other related EU policies and funding mechanisms** (e.g., Youth Guarantee, Youth Employment Initiative, European Social Fund) and that there is no duplication or

overlap, and good complementarity. However, all stakeholders pointed to some avenues in which coherence and synergies could potentially be improved, including through improving the visibility and awareness of the QFT (employer organisations, youth organisations, trade unions); providing more guidance to implement the QFT principles in practice (employer organisations, trade unions); cross-referencing the QFT in relevant EU policies (national authorities, PES); streamlining the QFT principles in monitoring and evaluation processes related to other of key EU instruments for example, the Youth Guarantee (national authorities, PES, civil society organisations)

5.4. EU added value

National authorities responsible for education and training and employment policies, PES, social and economic partners at national and EU level (trade unions and employer organisations), EU and national level organisations representing young people and/or young trainees, research /academia and other international organisations were all consulted on questions related to the EU added value of the QFT, through the interviews, the public consultation, the case studies, the expert meeting and the validation workshop. Trainees were not asked about the EU added value of the QFT in the trainee survey given the fact that they are unlikely to have such knowledge and the priority given to simplifying the trainee survey in order to maximise response rates from this stakeholder group.

The perception of EU added value resulting from the implementation of the QFT was overall positive, as evidenced in the consultations with national authorities, PES youth organisations, trade unions, and employer organisations through the interviews, the public consultation, the case studies, the expert meeting and the validation workshop.

Interviewed national authorities, civil society, youth organisations, and trade unions recognised the **value of the QFT in setting out common guidelines**. Moreover, national authorities from Member States with less developed systems stressed that the added value brought by the QFT in **fostering policy and legislative changes at national level**. Furthermore, employer organisations participating in the interviews and the validation workshop praised the **flexibility of the QFT** in allowing Member States to decide how and to what extent to implement its principles. Furthermore, the public consultation confirmed this positive views as most respondents stated that the implementation of the QFT produced added value to a large extent or moderate extent by **increasing the number of quality traineeships** (71%, 119 out of 169), with public authorities standing out as the respondent group expressing the highest support for the QFT in this area; and **encouraging young people to take up traineeships** (71%, 119 out of 169), strongly supported by respondents from academic/research institutions.

However, a number of consultees despite recognising the important role of the QFT in providing overarching standards, questioned the extent to which the QFT had direct impact on legislation and the reality of traineeships on the ground. These views were held by interviewed national authorities from Member States where legislation and frameworks on traineeships existed prior to 2014. According to these stakeholders the added value of the QFT lies mostly in **fostering more dialogue and increasing the debate around quality traineeships**. Some employer organisations consulted in the interviews and the case studies also argued that **existing differences between labour markets across the EU mean that overarching instruments as the QFT bring little added value in practice**. Views from respondents to the public consultation seem to align with these concerns as only 22% of respondents (32 out of 169) indicated that the QFT has prompted structural policy changes at the national level.

- Lastly, **stakeholder views on discontinuing the QFT at the EU level were mixed and varied both across and within consulted groups**. A number of social partners, national

authorities, and youth organisations consulted through the interviews, case studies, and validation workshop commented that **discontinuing the QFT or continuing as it stand would have no impact as its principles have been embedded into national legislation** in most Member States. Other consultees from the same stakeholder categories and participating in the same consultation activities, however, commented that **discontinuing the QFT would likely result in a loss of guidance and impetus for the further development of national frameworks**. These stakeholders, moreover, called for the QFT to be strengthened, with some employer organisations and national authorities highlighting the need to invest in supporting actions (e.g., promoting awareness raising and mutual learning); and youth organisations and trade unions stressing the importance of adding new principles to the QFT and reconsidering its non-binding nature.

5.5. Relevance

National authorities responsible for education and training and employment policies, PES, social and economic partners at national and EU level (trade unions and employer organisations) and research /academia and other international organisations were all consulted on questions related to the relevance of the QFT, through the interviews, the public consultation, the case studies, the expert meeting and the validation workshop. While trainees were not directly asked about the relevance of the QFT in the trainee survey, their feedback on their traineeship experience through the trainee survey has been triangulated with the outcomes of the other consultation activities to assess the relevance of the QFT.

There is strong agreement across stakeholders consulted that the **QFT continues to be highly appropriate to fostering the labour market integration of young people**, with the learning content and the written agreements standing out as the QFT principles considered to be the most relevant. There is agreement across all stakeholder groups that **establishing the learning objectives is key in increasing young peoples' employability**. 98% (254 out of 259) of respondents to the public consultation identified learning and training objectives as either very important or important to ensure the quality of traineeships. There is agreement on this between trade unions and employer organisations, with 88% (7 out of 8) of companies/business organisations and 100% (6 out of 6) of trade union respondents to the public consultation identifying the learning component as particularly important. The importance of traineeships as educational experiences was stressed particularly **in the context of a changing labour market** where the skills demands of employers are constantly evolving.

Moreover, PES and national authorities interviewed in particular highlighted that the **written agreement is a “bedrock” of the traineeship** as it gives young people access to information on their relationship with employers and allows them to understand what is required from them. Transparency on the rights and obligations of trainees is seen as particularly relevant by interviewed national authorities and PES given that a traineeship is likely a young person's first experience on the labour market. The public consultation further supports this: concluding a written agreement was identified as a key element increasing traineeship quality by 77% (200 out of 259) of respondents, with 71% (24 out of 34) of former or current trainees identifying the existence of a written agreement as very important for quality traineeships.

Furthermore, during the interviews, a number of representatives from national authorities, PES, youth organisations, and trade unions highlighted that **the QFT's exclusive focus on open market and ALMP traineeships might affect its relevance** as traineeships that are part of formal education or training programmes, which are commonplace and equally relevant for young people's employability, are excluded. However, both the **employer organisations** present in the validation workshop and the national authorities that shared their views on this issue during the validation workshop stressed that broadening the scope of the QFT would result in clashes with existing legislation regulating compulsory traineeships and/or traineeships that are part of education.

Stakeholder views converge around the continued relevance of the QFT with all types of stakeholders agreeing that the QFT is **still very relevant to respond to needs within the EU in terms of supporting young people to enter the labour market**. However, adjustments to ensure that the QFT can respond to new challenges may be warranted. For example:

- Employer organisations at EU and national level participating in the interviews and validation workshop stressed that there is room to increase the relevance of the QFT in tackling skills mismatches through an increased focus on the learning component of the QFT. According to these stakeholders, this could entail increased efforts by traineeship providers to map their own skills needs to offer more targeted opportunities; greater focus on skills recognition; and greater support and guidance for employers to carry out skills assessments and provide adequate supervision.
- Consulted stakeholders also noted that the push towards **remote and hybrid work** brought about by the pandemic may require adjustments for the QFT to remain relevant. EU level stakeholders and national authorities, trade unions, and PES taking part in the interviews, the case studies, and the expert group reported that remote/hybrid traineeships present risks (e.g., digital learning not suit the individual learning styles of all trainees; lack of socialisation negatively affecting motivation and engagement, and, in turn, trainees' wellbeing; further marginalisation of disadvantaged groups lacking digital skills and/or access to adequate ICT equipment; increased costs for traineeship providers) which the QFT should address. However, EU level employer organisations participating in the validation workshop mentioned that the current lack of data on the prevalence remote traineeships across sectors means that no additional principles on remote working should be included in the QFT to increase its relevance.

Stakeholders **views on the non-binding nature of the QFT as a Council Recommendation remain polarised**. Youth organisations, trade union representatives, as well as a minority of national authorities consulted through the interviews, expert group, and validation workshop held the view that the **non-binding nature of the QFT leaves excessive room for Member States to decide whether and how to implement the QFT**, undermining its relevance and not leading to concrete legal changes. EU and national level employer organisations as well as the majority of national authorities participating in the same consultation activities, on the other hand, stressed that a **non-binding tool allows Member States to retain sufficient flexibility** to take into account existing national industrial relations and education and training practices.

Lastly, the consultations showed differences in views on the need to include additional principles to increase the relevance of the QFT, with stakeholder groups clearly split around the issue of trainee remuneration and access to social protection as follows:

- Trade unions, youth organisations and EU and international agencies participating in the interviews, the case studies, the expert group, and the validation workshop agreed that **a requirement to pay and/or reimburse trainees would increase the relevance of the QFT**, as paid traineeships would result in higher productivity, better reputation of employers, higher take up and retention rates, and ensure increased accessibility for all groups of young people. The trainee survey confirmed that trainees themselves view pay as highly relevant, with 87% (1.597 out of 1.836) of respondents reporting that being paid for their traineeship was essential or important for them. Even those trainees who received an allowance during their traineeships indicated that their compensation was either sufficient to a small extent (40%, 734 out of 1.836) or not sufficient at all (22%, 404 out of 1.836) to cover basic living costs. The public consultation further supports these views, as 76% (198 out of 259) of respondents stated that ensuring trainees are paid would increase the quality of traineeships to a large extent, including the majority of public authorities (91%, 77 out of 85), trade unions (100%, 6 out of 6), and current/former trainees (74%, 25 out of 34).
- Employer organisations at the national and EU level consulted through the interview programme, the case studies, and the validation workshop, however, cautioned against the potentially **negative consequences and/or the challenges of trainee pay**. These include

further blurring the distinction between trainees and workers, interfering with national labour law; as well as additional costs for traineeship providers (e.g., HR and administrative costs), potentially discouraging employers from offering traineeship opportunities at all. Costs could disproportionately impact SMEs, which tend to be the majority of traineeship providers, as the trainee survey found that the vast majority of trainees undertook their traineeship in medium (50%, 478 out of 956) or small size companies (24%, 229 out of 956), as opposed to large employers (17%, 162 out of 956). Negative views, however, were not unanimous as a minority of employer organisations participating in the interviews recognised the benefits that paid traineeships can bring to traineeship providers, including avoiding reputational damage from offering unpaid opportunities and cultivating a greater sense of ownership from trainees, leading to higher productivity. Furthermore, the responses to the public consultation show that the majority of enterprises offering traineeships (60%, 3 out of 5) consider that ensuring trainees are paid would increase the quality of traineeships to a large extent.

Lastly, consultees from trade unions, youth and civil organisations at the national and EU level participating in the interviews and the expert group highlighted that a new principle on **access to social protection would increase the relevance of the QFT by setting trainees on a positive trajectory in the world of work**. The trainee survey confirmed that social protection is important for trainees themselves, with 84% (3.181 out of 3.787) of respondents consider being covered by health and sickness benefits as essential or important; and 78% (2.954 out of 3.787) of trainees surveyed indicated that having access to minimum income support is either essential or important. The public consultation somewhat reinforced these findings, as ensuring access to a variety of additional benefits received broad support from respondents: health and sickness benefits (84%, 217 out of 259), minimum income (78%, 202 out of 250), pension rights (76%, 197 out of 259). However, as with trainee pay, employer organisations, particularly at EU level, consulted through the interview programme and participating in the validation workshop, stressed that **a principle on social protection would affect the flexibility that the QFT warrant, and result in increased costs and administrative burden** discouraging businesses, from offering traineeships. Furthermore, when it comes to access to specific benefits, the public consultation showed that respondents from enterprises offering traineeships were the group most frequently held the view that access to unemployment benefits would increase the quality of traineeships only to a small extent (40%, 2 out of 5).

Annex 5: Report from the expert meeting

26 April 2022 (14:30 – 17:30 CET)

1. Welcome and Introduction

Vicki Donlevy from Ecorys welcomed the participants to the Expert Group and provided an overview of the context and objectives of the meeting. She explained that the Expert Meeting is part of the targeted consultations planned for Ecorys' study supporting the evaluation of the 2014 Council Recommendation on a Quality Framework for Traineeships (QFT), with the aim to gather further evidence to address gaps in the research, identify good and less good practices, and discuss potential next steps.

Max Uebe, Head of Unit at DG EMPL, welcomed the participants and set the scene by presenting key policy developments on EU policy priorities on youth employment and the school-to-work transition, as well as the objectives of the evaluation of the QFT. Mr Uebe highlighted that the European Commission has made youth one of their key priorities. The reinforcement of the Youth Guarantee in 2020, the decision to make 2022 the European Year of Youth, and the high level of EU funding made available to support young people are evidence of this strong commitment. As part of this the Commission has committed to the review of the QFT in the European Pillar of Social Rights Action Plan and to respond to concerns raised by stakeholders and the European Parliament in relation to young people's access to quality traineeships to ease their school-to-work transition.

Lastly, Mr Uebe invited the participants to contribute to the public consultation on the evaluation of the QFT launched by the European Commission, which will remain open until 13 June.

2. Study overview

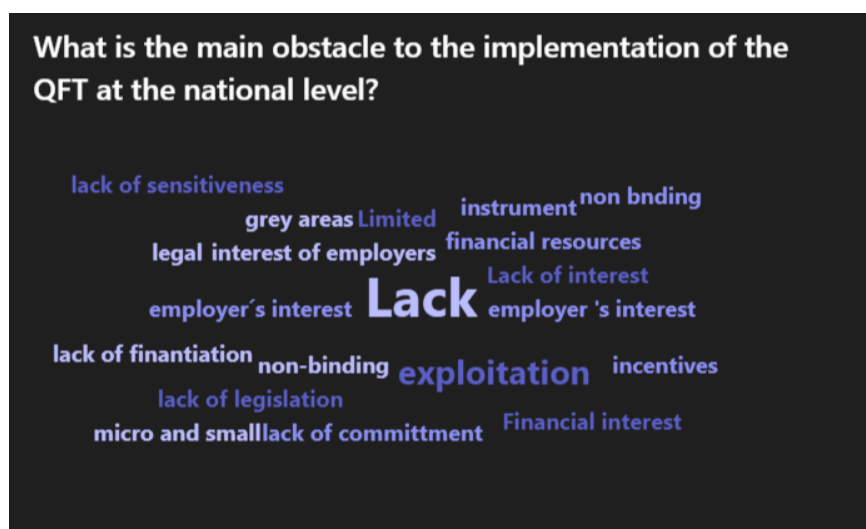
Vicky Donlevy from Ecorys provided an overview of the study, outlining key objectives and main challenges, and providing a brief explanation of the main research activities undertaken by the Research team. She explained that the study is currently in its interim stage and mentioned that further evidence is being gathered. The draft findings of the study will be discussed in a validation workshop after the summer.

3. Session I - National approaches to implementation of the QFT

Łukasz Sienkiewicz, High-Level Advisor for the study supporting the evaluation of the QFT, introduced the session outlining that discussion would focus on examining national approaches to the implementation of the QFT through both plenary and breakout room discussions.

To set the scene, Łukasz introduced Marianna Georgallis from Ecorys, who presented the preliminary findings of the trainee survey conducted by Ecorys. The aim of the survey was to gather the opinions of trainees on the prevalence and quality of traineeships in the EU. Ecorys received 1,836 responses from respondents within the core target group and 3,787 responses overall. While the analysis of the survey responses is still preliminary, the key trends are outlined in the presentation attached to this report.

Word Cloud: Łukasz then asked the participants to reply to the following question through the Word Cloud: What is the main obstacle to implementing the Quality Framework for Traineeships at the national level? The results of the Word cloud are presented below:



Some of the main obstacles that emerged included a lack of interest from employers as well as the non-legally binding nature of the QFT.

Breakout Groups I: After the Word Cloud exercise, participants were divided into breakout groups and invited to discuss the following questions:

- What have been the **main obstacles** to effective implementation of the QFT, or specific QFT principles, into national policies, frameworks and/or legislation in your country? How can these be overcome?
- What have been the **main success factors** in the implementation of the QFT, or specific QFT principles into national policies, frameworks and/or legislation in your country? Is there any good practice that you can share?
- What is the **impact of implementation** of quality traineeships/QFT principles in your country on:
 - Young people?
 - Traineeship providers (employers)?

Feedback from the group discussions

Group 1: Participants of the first group highlighted that there are challenges related to the different types of traineeships (open-market, ALMP and student-traineeships), either because not all types of traineeships exist in all countries or because of a lack of awareness on open market traineeships, especially by employers and a lack of agreement of the main features of a traineeship. Representatives from youth organisations mentioned that, from their perspective, the main obstacles are low remuneration, the risk of misuse of traineeships and that traineeships often do not lead to an employment contract, which can lower the motivation for young people to engage. Another challenge that emerged was a lack of monitoring. The main success factors mentioned were financial support of companies not only throughout the traineeship but also afterwards, to facilitate the transition to stable employment by the company.

Group 2: Challenges to the implementation of the QFT discussed in this group were the lack of political will and employers' interest to provide quality traineeships. The lack of sufficient public resources to support quality traineeships was also mentioned: employers do not receive enough subsidies to be incentivised to provide quality traineeships, and trainees are not interested in taking up traineeship opportunities due to limited financial compensations. From a trade union perspective, the non-binding nature of the QFT reduces its effectiveness and many stakeholders are not aware of it.

Participants also highlighted that there is a need to change the narrative around traineeships. Quality traineeships are a win-win for everyone involved and their benefits should be clearly communicated. Participants considered the cooperation between different stakeholders and collective agreements to be key to ensure a successful implementation. Furthermore, to avoid heavy administrative burdens, measures should be accompanied by resources and capacity building.

Group 3: From a trade union perspective, the main obstacles are the non-binding nature of the QFT and the incoherent implementation across Member States, as well as the lack of interest by employers in training people. The participants of the group shared best practice examples from the tourism sector in Greece, which recognises the added value of traineeships and pays trainees accordingly, as well as actions taken by Romania to adopt legislation to implement the QFT.

However, the group agreed that the QFT had little impact and that Member States have not taken sufficient action to implement it. Lack of remuneration has an impact on living standards and can lead to social inequalities, as only those with financial means can benefit from training opportunities. The Group suggested to follow a similar bottom-up approach as the Youth Guarantee and to strengthen the QFT through targeted actions via the European Semester process.

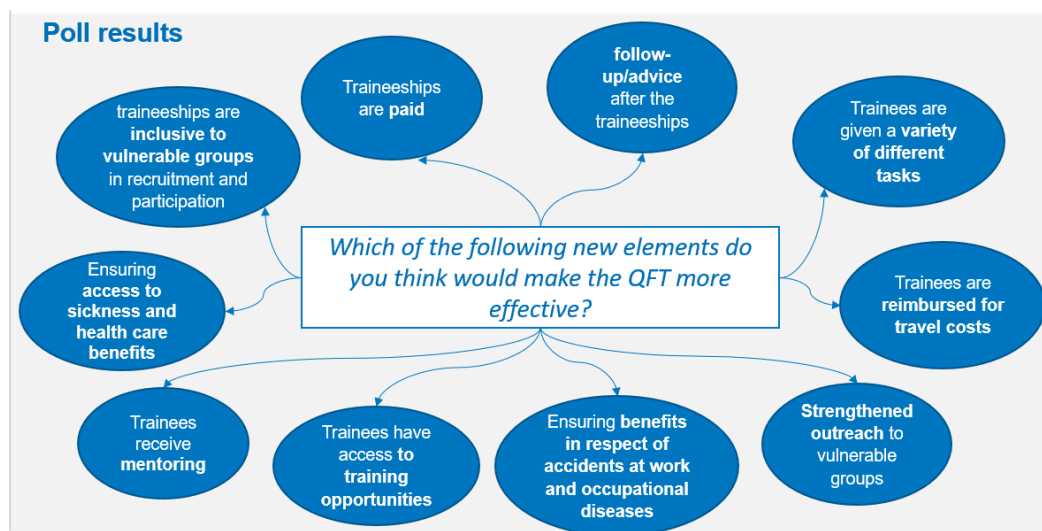
Group 4: The main obstacles that emerged in the discussions were a lack of uptake of traineeships by young people, the risk that traineeships replace jobs and a lack of financial incentives for employers to train and mentor trainees. The need for a change in mentality and for efforts to be put into raising awareness of the benefits of traineeships were mentioned as potentially effective.

The Group generally agreed that a key success factor to implement quality traineeships is providing remuneration. In the examples shared, the salary was paid either by the state (MT), or the employers directly because they recognise the importance of training (EL – tourism sector) or because the national legislation requires that trainees to be paid a salary that cannot be lower than the national minimum wage. While the Group shared that in many countries the principles of the QFT are implemented to a large extent by Member States as they are enshrined in national legislation, and that the traineeships are of good quality, the participants did however not necessarily agree that there was a direct link between governments taking action and the QFT coming into force. Lastly, it was suggested that traineeships could play a more important role in addressing the skills mismatch.

4. Session II - Looking forward: policy priorities for the evaluation of the Quality Framework for Traineeships and quality traineeships

Elvira Gonzalez Gago, High-Level Advisor for the study, introduced the session focusing on sharing ideas on priorities and next steps for the future in relation to the QFT and quality traineeships.

Poll exercise: Elvira explained that, ahead of the Expert Meeting, participants were asked to select up to 5 potential new elements to be added to the QFT to make it more effective from a list provided. Elvira presented the results of this first survey, sharing the 10 most voted options.



After presenting the results of this first poll, Elvira asked the participants to further narrow down their choices and select the 3 potential new elements that they would prioritise out of the 10 listed. The three most voted options were:

- Ensuring trainees receive mentoring
- Traineeships are paid
- Ensuring access to sickness and health care benefits

Breakout Groups II: After the poll exercise the participants were divided into the same four breakout groups and invited to discuss the following questions:

1. Are there any additional dimensions that were absent in the original QFT that would increase its relevance and impact?
2. What can be done to better support Member States to implement the QFT?
3. What can be done to better engage employers to provide quality traineeships?
4. What needs to be changed in the future to make sure quality traineeships are provided, also in light of recent developments (e.g., digital transformation; Covid-19 pandemic; conflicts)?

Feedback from the group discussions

Group 1: The Group mentioned that the QFT would benefit from the inclusion of the following additional dimensions: access to remuneration and social protection and access to collective agreements. Some participants called for clearer definitions of the different types of traineeships to help Member States implement the QFT, including resolving some translation issues, for e.g., there is no term for QFT in Croatian. Other participants of the group highlighted that there is a need to recognise that each Member State might have a different system in place, which makes definitions and coverage by collective agreements difficult in practice. It was also mentioned that efforts to improve education should be strengthened and that education should be tailored to the labour market needs, so that young people do not need to go through a traineeship.

Representatives from youth organisations mentioned the need to increase the efforts to collect data on traineeships, and involve relevant stakeholders (e.g., trade unions, youth organisations, but also labour inspectorates). Moreover, it was suggested that making access to EU funds such as the

European Social Fund+ (ESF+) conditional to meeting the quality standards of the QFT would make its implementation more effective.

To better engage traineeship providers, the Group proposed to effectively communicate the added value of traineeships for employers, as well as supporting them financially (especially SMEs) and to involve employer organisations in the conversation. The European Alliance for Apprenticeships was pointed out as a positive example.

Group 2: The Group mentioned the following themes as either absent from the original QFT or not sufficiently strong: ensuring a safe and healthy workplace, without any discrimination; limiting overtime and the number of trainees within a company; and ensuring compensation and transparency. Furthermore, the Group highlighted that the implementation of the QFT principles should be monitored and that there may be a need to change the non-binding nature of the QFT.

To better support Member States in the implementation of the QFT, the Group suggested increased EU-level data collection, stronger monitoring of the implementation and better sharing of good practices. When it comes to better engaging employers to provide quality traineeships, two main themes emerged from the discussion: providing subsidies and raising awareness. The participants highlighted that these subsidies, however, should not be used to finance precarious working conditions. Some proposed initiatives included quality certificates and tax exemptions and subsidies for companies offering an employment contract after a traineeship. There was also common agreement on the need to develop a better communication strategy targeted at SMEs (e.g., social media and promotional campaigns) to raise awareness.

The Group also discussed different measures to ensure traineeships better adapt to broader changes in the labour market and society including the impact of the pandemic and digitalisation. These included digital traineeships and teleworking, promoting cross-border traineeships and using the knowledge of EURES and the European Labour Authority (ELA) to increase monitoring and promote the sharing of information and good practices.

Group 3: The Group mentioned the following additional dimensions that would increase the relevance and impact of the QFT: access to remuneration and social protection, better data collection, preventing the exploitation of trainees through e.g., the limitation of the maximum number trainees per company and the allocation of more resources to labour inspectorates.

To better support Member States implementing the QFT, the Group proposed to integrate the QFT into the European Semester and make sure that access to EU funds (e.g., ESF+ and the Recovery and Resilience Facility) is conditional to implementing key aspects of the QFT. Building stronger partnerships between educational institutions and social partners, to guarantee coherence between education and the labour market was mentioned as another possible solution. Moreover, the Group highlighted that there is a need to increase awareness of the rights of trainees who engage in cross-border traineeships.

To better engage employers the Group agreed that a holistic campaign to promote success stories would be needed. This would include delivering the message that offering quality traineeships can be beneficial for employers too, by improving the reputation of the company and the sector it operates in. For example, it was mentioned that the tourism sector in Austria does not have a good reputation which reduces the interest of young people in engaging in a traineeship, whilst employers face skill shortages.

The Group highlighted that, in order to ensure that traineeships can adapt to current and future developments, it is important that trainees are properly equipped for telework and receive appropriate guidance and mentorship. Participants mentioned that poor quality traineeships,

especially traineeships that are not adequately remunerated, perpetrate inequalities, as these learning opportunities are only accessible to young people with sufficient financial means. They underlined that this is an important lesson to take into account in relation to the impact of the covid-19 crisis: the pandemic has further reinforced existing inequalities, therefore it is even more important to ensure that high-quality traineeships are provided and that they are accessible to all young people. Lastly, employers should be incentivised to train young people in green and digital skills, rather than expecting them to already have them.

Group 4: The Group mentioned the following additional dimensions that would increase the relevance and impact of the QFT: adequate remuneration and ensuring that traineeships are of an educational nature, including by investing in training mentors. Beyond including new elements, most participants mentioned that the impact of the QFT will remain low if its non-binding nature is not changed, and if it is not further strengthened by adding new elements and ensuring that its content is further specified (e.g., it would not be sufficient to say that trainees should be paid – a revised QFT should include quality criteria on the level of payment too). The Group agreed that the QFT already provides a good level of guidance to Member States, and that therefore it's a question of ensuring that there is enough willingness to implement it, rather than focusing on providing additional support. However, it was mentioned that the implementation of the QFT would benefit from a stronger involvement of labour inspectorates.

The Group agreed that to better engage employers to provide quality traineeships, a shift in the narrative is necessary. The Group stressed that awareness raising around the benefits and the added value of traineeships would be important and that hiring trainees should be seen as an investment rather than a cost. Moreover, the Group agreed that financial support should be provided to companies only under certain conditions and if quality standards are respected. However, the Group highlighted the need for more diverse and comprehensive set of incentives.

The Group mentioned that it is difficult to identify what the necessary changes would be to adapt to current and future developments. The Group agreed that changes in the labour market need to be addressed in a broad and holistic manner, as they do not affect young people exclusively. Greater investment in lifelong learning and training at the workplace would be an important first step. To this end, it would be good to consider opening up traineeships to older people, as a tool for reskilling – this is however an issue in some countries where specific age limits exist, and traineeships are only available to youth. Lastly, the Group mentioned that having a stronger QFT, followed by coherent and efficient national measures would provide a good safety net should new crises arise in the future.

5. Closing remarks

Vicki Donlevy from Ecorys provided a brief overview of the next steps for the study and invited the participants to contribute to the ongoing public consultation on the QFT as well as to promote it within their networks.

Shui Beam Lam from DG EMPL thanked the participants for sharing their ideas and feedback on the QFT and mentioned that the European Commission took note of the input.

6. Attendance

The meeting was attended by 35 participants (excluding DG EMPL and Ecorys).

Organisation	Type of stakeholder	Country
ETBI	Education And Training Provider	Ireland
EUROCHAMBERS	Employer Representative	Belgium
Employers' Confederation Of Latvia	Employer Representative	Latvia
Confederation Of Finnish Industries	Employer Representative	Finland
Spanish Confederation Of Employers' Organizations	Employer Representative	Spain
SBB	Expert	Netherlands
Ministry Of Family And Social Policy	Ministry	Poland
MINISTRY OF LABOUR AND SOCIAL AFFAIRS	Ministry	Greece
Ministry Of Labour, Pension System, Family And Social Policy	Ministry	Croatia
Ministry Of Social Affairs	Ministry	Estonia
Ministry For Finance And Employment	Ministry	Malta
Ministry For Innovation And Technology Of Hungary	Ministry	Hungary
Ministry Of Social Security And Labour Of the Republic Of Lithuania	Ministry	Lithuania
Federal Ministry Of Labour And Social Affairs (Germany)	Ministry	Germany
Ministry Of Social Security And Labour Of The Republic Of Lithuania	Ministry	Lithuania
SEPE - EMPLOYMENT SERVICES MINISTRY OF LABOUR-SPAIN	PES	Spain
National Agency For Employment	PES	Romania
ANPAL	PES	Italy
Jobsplus	PES	Malta
Public Employment Service	PES	Malta
Lithuanian Public Employment Service	PES	Lithuania
Arbeiterkammer Wien	Trade Union	Austria
General Workers' Union	Trade Union	Malta
The Central Organisation Of Finnish Trade Unions SAK	Trade Union	Finland
ETUC - European Trade Union Confederation	Trade Union	Belgium
Federation Of The Chemical, Energy And General Workers' Unions	Trade Union	Hungary
CNSLR Fratia	Trade Union	Romania
CGIL - Italian General Confederation Of Labour	Trade Union	Italy

Sindikat Mladi Plus (Trade Union)	Trade Union	Slovenia
UGT Spain	Trade Union	Spain
CCOO	Trade Union	Spain
Hak-İş	Youth Organisation	Other
European Youth Forum	Youth Organisation	Belgium
European Youth Forum	Youth Organisation	Belgium
UNML	Youth Worker	France
DG EMPL	European Commission	
DG EMPL	European Commission	
DG EMPL	European Commission	
DG EMPL	European Commission	
DG EMPL	European Commission	
Ecorys	Research Team	
Ecorys	Research Team	
Ecorys	Research Team	
Ecorys	Research Team	
Ecorys	Research Team	
High Level Advisor	Research Team	
High Level Advisor	Research Team	
High Level Advisor	Research Team	

Annex 6: Report from the Validation Workshop

20 September 2022 (9:30 – 12:30 CET)

1. Welcome and Introduction

Vicki Donlevy from Ecorys welcomed all participants briefly outlined the agenda and overall objectives of the validation workshop.

Max Uebe, Head of Unit at DG EMPL, thanked the participants in advance for their contribution and provided a short overview of the aim of the study supporting the evaluation of the Quality Framework for Traineeships (QFT), as well as the broader policy context surrounding it. Mr Uebe stressed that the QFT study is expected to identify strengths and weaknesses of QFT, as well as lessons learned for the way forward, so that it can play an important role in upcoming policy developments in the area of school-to-education transitions. Mr Uebe, moreover, highlighted that the European Commission's decision to celebrate 2022 as the European Year of Youth, as well as the upcoming European Year of Skills in 2023 represent important opportunities to further discuss potential steps to be taken to support young people entering the labour market.

Vicki Donlevy from Ecorys presented a brief overview of the study, outlining key objectives and main challenges, and providing a short description of the main research activities undertaken by the Research team. She explained that the study is currently in its final stage and mentioned that the feedback gathered at the validation workshop will be included in the draft final report.

2. Session I - Has the QFT been successful to date? If so, to what extent and why?

Key findings and lessons learned

Marianna Georgallis and Vicki Donlevy presented the draft findings from the study on effectiveness, efficiency, coherence, as outlined in the Input Paper shared with participants ahead of the workshop.

After outlining the main draft findings from the study, Marianna and Vicki presented the main lessons learned related to these as outlined in the Table below.

Table 1. Preliminary lessons learned on effectiveness, efficiency, and coherence

Topic	Lessons learned
Boosting implementation	<ul style="list-style-type: none"> Beyond legal/national frameworks whose alignment with the QFT needs to be increased in many countries, particular attention needs to be paid overall to practical QFT implementation on the ground. More tailoring of provision, outreach and targeted support for employers and young people would contribute to allowing young people in all their diversity to have access to quality traineeships. Creating better linkages between quality frameworks for traineeships and apprenticeships both at policy and implementation level could provide benefits for both young people and employers and increase the quality standards of both. Employers could be encouraged to offer both traineeships and apprenticeships. Ensuring more links with the skills needs of local labour markets can help to increase the quality, relevance, and number of traineeships opportunities.

	<ul style="list-style-type: none"> Recommendations in the current QFT could be more direct to increase their effectiveness.
Scope of traineeships under the QFT	<ul style="list-style-type: none"> The term “traineeship” refers to a very diverse range of realities in most Member States. Future quality standards could define in more detail the scope of traineeships which are covered by for example, including a list of specific traineeship schemes/legislation in each Member State that are covered. There could be benefit in exploring the potential of extending the scope of the QFT to cover other types of traineeships, particularly those which are part of education or VET curricula.
Funding to support quality traineeships and the QFT	<ul style="list-style-type: none"> More signposting could be provided for national and regional stakeholders on the EU funds available to support implementation of quality traineeships. A range of financial incentives could be offered to support employers in the implementation of quality traineeships.

Source: Ecorys 2022

Andrew McCoshan, High Level Expert for the study, moderated the plenary discussion. Participants were asked whether they agreed with the findings and/or lessons learned, and to share their experiences and feedback with regards to the effectiveness, efficiency, and coherence of the QFT.

Confederation of Danish employers (DK): They mentioned that social partners play an important role in Denmark both in relation to traineeships and apprenticeships. However, the approach tends to be different: for apprenticeships, agreements are negotiated between social partners and the government, whereas for ALMP traineeships the involvement of social partners is limited to monitoring the career progression of individuals undertaking these training opportunities. Lastly, they mentioned that market traineeships do not exist in the Danish labour market.

MLADI plus (SI): They mentioned that the draft study findings match the issues that trade unions have raising over the years, and specifically the fact that low quality traineeships are driving labour standards down. According to Tea, measures should be implemented to avoid traineeships contributing to a race to the bottom when it comes to labour standards. This could be done, for example, by making sure that employers who hire trainees have access to additional financial benefits. Moreover, they highlighted that initiatives such as the European Pillar of Social Rights are more ambitious than the QFT, and that non-legally binding quality standards rarely influence legislation at the national level. According to MLADI plus, a legally binding framework would encourage the implementation of regulations in Members States and better ensure fair and quality traineeships.

Business Europe (EU): They stressed that employers see the value of traineeships as a way to ‘try out’ potential new hires. Moreover, he highlighted that the focus should be on the learning outcomes and education trajectory that a traineeship provides, rather than building a direct link between QFT and more structured labour market integration. The lack of data on the impact of traineeships, however, makes it difficult to draw conclusions and limits future proposals. They also stressed that lack of/low remuneration (e.g. compared to unemployment benefits) should not be seen as a barrier discouraging young people from taking up traineeship opportunities, as the focus should be on ensuring that traineeships enhance employability, and therefore the attractiveness of this form of work-based learning. Furthermore, according to Business Europe, a legally binding QFT would not be useful as there needs to be flexibility to allow for different national approaches. Lastly, the proposal to broaden the scope of the implementation of QFT to cover more traineeships is complex as different types of traineeships (i.e., compulsory versus open market traineeships) vary significantly on compensation, for example.

SMEUnited (EU): They highlighted that open market traineeships are helpful to support transitions into the labour market and secure work; however, it would be useful to know how many young people undertake open market traineeships as opposed to apprenticeships or compulsory traineeships part of education pathways, to better determine whether the scope of the QFT should be further

broadened. For SMEs it can be more difficult to offer traineeships due to extra costs. To increase the offer of traineeships among SMEs, it will be useful to have more transparency between the employer and trainee, as well as further awareness raising at the national level for SMEs about QFT and traineeships. Lastly, according to SMEUnited, the QFT should not be made a legally binding directive.

Ministry of Education (NL): They mentioned that broadening the scope of the QFT to include compulsory traineeships would probably create additional barriers in the Netherlands, due to labour market regulations not being in line with education guidelines. Education institutions in the Netherlands operate autonomously, so it would be difficult for the government to intervene on how they are organised.

Austrian Chamber of Labour (AT) They stressed that the effectiveness of the QFT would benefit from the addition of more legal requirements, as well as from ensuring that labour inspectorates are better equipped to carry out more thorough checks of traineeship standards, which in Austria are very poor. The example of the tourism sector was given; this is a very traineeship dependant sector which is leading young people leaving the sector in search of a more stable work contract elsewhere. As a result, young people face poor conditions, and the Austrian tourism sector suffers from a skills shortage.

European Youth Forum (EU): They highlighted that, in order for the QFT to achieve its full potential and result in quality traineeships and better working conditions, it would be necessary to have a legally binding framework. There has recently been a surge of youth unemployment (14%) and brain drain from countries with the highest levels of youth unemployment, which guaranteed quality working conditions could help to alleviate. When it comes to costs to businesses, she mentioned that reputational costs should not underestimated, as employers will be affected if they are not seen as ensuring quality standards to trainees.

UGT Spain (ES): They stressed that, for trade unions in Spain, establishing legally binding conditions through an EU directive is crucial to ensure minimum quality standards in all Member States. She mentioned that legislation is lacking in Spain, and that not enough is being done to monitor the quality of traineeships provided by employers. Given the lack of measures at the national level, legislation needs to come from the EU.

3. Session II: Has the QFT been successful to date? If so, to what extent and why?

Key findings

Marianna Georgallis and Vicki Donlevy presented the findings on relevance and EU added value, as outlined in the Input Paper shared with participants ahead of the workshop. After outlining the main draft findings from the study, Marianna and Vicki presented the main lessons learned related to these.

Table 2. Preliminary lessons learned on relevance and EU added value

Topic	Lessons learned
Content of the QFT, including QFT principles	<ul style="list-style-type: none"> An additional principle ensuring the remuneration of trainees and their access to social protection could be considered to address the main concerns of young people and make traineeships a more accessible opportunity. There is a need to integrate an equality perspective into the design and implementation of the QFT e.g., guidance on how to ensure traineeships

	<p>are accessible to young people with a disability, young people from ethnic minorities, and young people that with lower educational attainment etc.</p> <ul style="list-style-type: none"> • Future quality frameworks for traineeships need to clearly address and incorporate recent and emerging key trends including the impact of the Covid-19 pandemic, the new forms of working (e.g., distance working) and employment (e.g. platform work) and learning, and the digital and green transitions, by for example, including principles on 'remote traineeships'.
Cooperation and mutual learning to support QFT implementation	<ul style="list-style-type: none"> • Further mechanisms could be implemented at EU level to bring key national stakeholders together to oversee, monitor and seek to overcome obstacles to the successful implementation on the ground of the QFT. • The implementation of the QFT could benefit from the support of a network of committed stakeholders across the EU, as is the case for the support provided by the European Alliance for Apprenticeships (EAfA). • More EU level mutual learning could help inspire key stakeholders, increase compliance and improve the provision of quality traineeships. • Increased cooperation between all key stakeholders involved in traineeships at national, regional and local level, including trainees and organisations representing young people, can assist in monitoring and supporting implementation.
Further research	<ul style="list-style-type: none"> • Further research could be carried out on the obstacles to employers to offering quality traineeships; on the barriers preventing young people from taking up traineeships; on differences in the rights and conditions of traineeships across different sectors; and on the impact of the Covid-19 pandemic on the quality of traineeships and the evolution of means of traineeships (e.g., digital traineeships).

Source: Ecorys 2022

Plenary discussion: effectiveness, efficiency, and coherence

Łukasz Sienkiewicz, High Level Expert for the study, moderated the plenary discussion. Participants were asked whether they agreed with the findings and/or lessons learned, and to share their experiences and feedback with regards to the relevance and EU added value of the QFT.

Spanish confederation of employer organisation (ES): They highlighted that the focus of traineeships should be on learning and gaining experience, rather than on ensuring remuneration. According to them, it is important to stress that trainees are supposed to learn, and therefore they should not be earning the same amount as the employee who is training them. They also stressed that traineeship regulation in Spain has just been extended, particularly with regards to trainee rights and remuneration, and that inspections in Spanish companies have shown that businesses are not taking advantage of young trainees as cheap labour.

Confederation of Danish Employers (DK): They mentioned that the QFT needs to be revised, as it was adopted as a reaction to the 2008 economic and financial crisis and to respond to high levels of youth unemployment. However, the issues that the labour market is facing are difficult nowadays, and mostly relate to labour shortages. Employers are making efforts to engage with young people before they even start their careers to ensure sufficient labour supply: for example, in Denmark, companies try to cooperate with education institutions to talk to students about employment opportunities and traineeships.

Business Europe (EU): They highlighted that the added value of the QFT is that it is a framework for Member States to use as a starting point. However, Member States need to have the flexibility to adopt regulations that work for their specific national context. For example, when it comes to access to social protection for trainees, different countries have different rules on accessing these benefits (e.g., length of traineeship), and these differences should be respected.

Furthermore, they added that, when it comes to hybrid or remote traineeships, it would be relevant to look at the learning experience of the trainee and how this may be affected by doing the traineeship remotely/with little physical presence. Linked to this, it would be important to investigate whether

trainee mentors actually have the skills to provide the training online. Lastly, according to Business Europe, a more structured approach to the QFT, for example through the establishment of a network of interested stakeholders, could be useful. However it would be important to avoid carbon copying the European Alliance for Apprenticeships (EAfA), as apprenticeships and traineeships are different.

MLADI plus (SI): They stressed that the QFT should include clearer and more all-encompassing principles, such as fair remuneration and guidance to ensure these quality standards. They also highlighted that providing flexibility for employers often means precarity for trainees.

European Youth Forum (EU): They highlighted that the outcomes of the Conference on Future of Europe included a call on the EU to adopt legislation to ban unpaid traineeships.

European Trade Union Confederation (EU): From research conducted by the ETUC by speaking to trainees from across the Member States, a key gap in QFT is that there are no channels through which trainees can complain about the standards of their traineeship. This is important as labour inspectorates often do not have the capacity to investigate bad traineeships as they always receive recommendations rather than regulations. This means that they end up picking which recommendations to follow through on in inspections and these rarely prioritise the needs of young people. There therefore needs to be a regulation at EU level that forces labour inspectorates to investigate traineeship conditions more thoroughly. Ultimately in labour market analyses, young people are always worst off.

4. Session III: Looking forward

Participants were split into three breakout rooms based on what organisation they represented (national authorities; employer organisations; civil society and trade unions) and invited to discuss the following questions.

1. Potential new QFT principles:
 - a. What would be the impact of introducing remuneration and or social protection as quality principles for traineeships? Would there be any obstacles? What would be their cost?
 - b. Is there a need to introduce other new principles to the QFT? Which ones? What would be their impact?
2. To what extent do the objectives and measures addressed by the QFT continue to require action/support at EU level? What kind of support would be warranted? (E.g. an increased role for the European Labour Authority; increased EU wide data collection processes; greater space for cooperation and mutual learning).

The main contributions gathered in each breakout group are outlined in the sections below.

Group 1: National authorities

Ministry of Social security and Labour (LT): They mentioned that, while remuneration would be a positive change for trainees, it would be a financial burden for Member States. However, she also highlighted that there are already some measures in place that can provide support. For example, in Lithuania trainees undertaking ALMP traineeships receive a grant. Moreover, additional measures include employer subsidies to cover for remuneration costs. Lastly, she stressed that young people need practical experience and skills, and that open market traineeships, ALMP traineeships, and apprenticeships can cater for these needs, however all these instruments are different, with apprenticeships being more regulated and complex, and providing additional obligations for employers.

Flemish PES (BE): They mentioned that he agrees that remuneration should be one of the QFT principles, but that, in practice, the level of remuneration tends to vary depending on the type of traineeship, and the extent to which trainees contribute to the work of the traineeship provider. Furthermore, he explained that all traineeships in Flanders are required to be remunerated. Through these traineeship contracts, remuneration is provided by the employer, although it is not always paid directly to trainees: for example, in the case of ALMP traineeships, remuneration is provided through the PES, that, where necessary, can top up the amount paid by the employer. According to Peter, there is a key difference in the approach to remuneration: from the employer perspective, remuneration depends on the contribution of the trainee, while the PES acts as a 'buffer' by ensuring that all trainees receive at least the minimum wage. Furthermore, they highlighted that, while increasing the number of cross-border traineeships would be important positive as it would allow employers to reach a higher number of possible candidates, many legal issues exist around trainee mobility. The Flemish PES is reluctant to send trainees abroad as they know that the trainees might end up in a legal vacuum, and it is uncertain how Belgian contracts will be perceived by another labour inspectorate. To this end, he mentioned that it would be useful to have an EU recognised contract (as opposed to bilateral agreements between countries) and limiting the use of such contract to recognised institutions. Lastly, on the issue of the non-binding nature of the QFT, they concluded that introducing stricter rules (might be counterproductive, and that flexibility is preferred as it allows different types of traineeships to occur and for young people to find what they are looking for.

Agency for Higher Education (ES): They mentioned that the QFT principles should be based on the different types of existing traineeships. If trainees are learning, they should be entitled to conditions that are specific to learning, i.e., variable salary. However, they stressed that all trainees should have access to the same level of social protection.

Unemployment Insurance Fund (EE): They mentioned that in Estonia remuneration for trainees tends to be low. As a consequence, young people often would rather seek low-skilled jobs as these provide a guaranteed wage than invest in learning and gaining more skills through a traineeship. Employers are also in need of fixed employees and are more ready to offer a job rather than a traineeship experience. Aileen stressed that both sides need to be more aware of traineeships and their benefits. To encourage more traineeships, it would be useful for employers to be dealing with simpler regulations, and trainees to receive higher remuneration. Lastly, she mentioned that it would be useful to regulate traineeships in a similar way to apprenticeships.

Ministry of Education (NL): They shared that the main issue in the Netherlands is that education institutions and the labour market are autonomous from one another. According to them, as many countries have a decentralised system, a one rule fits all approach is not easy to implement in this context. Due to these differences, there should not be any binding legislation at EU level. Instead, exchanges between Member States are more productive, as they allow different countries to further their thinking and learn from one another.

Group 2: Employer organisations

Confederation of Danish employers (DK): They stressed that it would not be useful to introduce remuneration or access to social protection as QFT principles, due to open market traineeships not being so common. Furthermore, they highlighted that the European Labour Authority (ELA) has a clear mandate and that this should not be extended to cover traineeships. According to them, the focus of QFT should be more at the national level rather than at the EU level.

Business Europe (EU): They stressed that while it is important to have a guiding framework such as the QFT, and that its principles are relevant, flexibility in national approaches must be preserved, as a more rigid approach might discourage employers from offering traineeships. In relation to the issue of remuneration they mentioned that traineeships are about learning to gain experience and increase employability and this needs to be further highlighted. He mentioned that

trainees' expectations should be managed when it comes to remuneration and social protection. Furthermore, according to Business Europe, the QFT should not mention remuneration, but focus on compensation as a principle. This term better reflects that compensation will vary from country to country and that the main purpose of a traineeship is to gain experience rather than an employee salary. More broadly, it would also be worth considering conducting further research on whether paid traineeships have better outcomes in terms of employability. Lastly, with regards to trainee mobility, they highlighted that cross-border traineeships make up a very small proportion of traineeships, and therefore it difficult to identify issues, or the extent to which these issues are affecting a significant enough number of trainees to require cross-border labour inspections as part of the QFT. According to him, the mandate of the ELA does not apply as inspections are carried out at the national level.

SME United (EU) : They stressed that there is no need for new principles in the QFT, and that it is important to maintain a clear distinction between trainees, apprentices, and workers.

Lastly, participants to Group 2 had a brief discussion around remote/hybrid traineeships, and on whether trainees might be more susceptible to the challenges posed by hybrid/remote working. However, among the employer organisations, the consensus was that remote working principles do not need to be included in QFT, as there is not sufficient evidence on the number of traineeships being offered remotely, and that the prevalence of this type of traineeships would also be dependent on the sector.

Group 3: Trade Unions and Civil Society

European Trade Union Confederation (EU): They stressed that remuneration should be one of the QFT principles, as trainees are not just learning, but also doing work. According to ETUC, remuneration and social protection cannot stand in a vacuum, there needs to be regulation to ensure these become obligations for employers.

Spanish confederation of employer organisation (ES)¹: They highlighted that the costs to companies offering traineeships are significant: they must develop internal competencies on how to teach and mentor trainees, ensure they are protected from any health and safety hazards, and provide a salary. Therefore, trainees and workers should not have the same remuneration because traineeships are more costly and investment heavy for employers. Providing the same salary as normal workers would mean that the costs would not be proportionate.

Austrian Chamber of Labour (AT): They mentioned that the Austrian Chamber of Labour tried to follow the apprenticeship example, as these are very well regulated in Austria, to negotiate remuneration in collective bargaining agreements for traineeships. However, this has posed several challenges, as apprenticeships are different (i.e., they last longer, and salary progression is foreseen for apprentices over the course of their experience). In general, the Chamber advocates for trainees to get the minimum entry level salary in the sector where the traineeship takes place.

Ministry of Labour, Social Security and Social Solidarity (EL)²: They mentioned that there is no specific regulation for traineeships in Greece, so theoretically these should fall under general labour law and should be based on a contract. On the contrary, apprenticeships are very well regulated in Greece. A reason for this is due to apprenticeships lasting longer than traineeships, and because apprentices are considered as workers rather than learners which means that a percentage of the minimum wage is provided to apprentices. Despite these differences, trainees should be remunerated and have access to social protection.

European Youth Forum (EU): They stressed that remuneration should be a principle of the QFT: traineeships represent a steppingstone for young people in their careers, often replacing regular

¹ Please note that, due to technical difficulties, this stakeholder was included in Group 3 instead of Group 2.

² Please note that, due to technical difficulties, this stakeholder was included in Group 3 instead of Group 1.

employment, and therefore they should be paid. This is especially important when considering inclusion, as adequate remuneration will guarantee that all groups of young people can have access to traineeships. Furthermore, the outcomes of the European Youth Forum's Collective Complaint against Belgium, highlight how even when regulation exists, there are often gaps in the law that allow for unpaid traineeships to happen. Therefore, aside from remuneration, the QFT revision has to be an opportunity to focus more on enforcement. According to the European Youth Forum, moreover, the QFT should also include a principle on traineeship data. Currently, the 2013 Eurobarometer on traineeships still represents the most comprehensive data on the issue, but this is an old tool and needs updating. Civil society and trade unions do not have the resources to monitor traineeships on their own, therefore support at EU level would be helpful. On cross-border traineeships, Jessica highlighted that the QFT provides a standardised approach across the EU, and that this is particularly important in relation to Russia's invasion of Ukraine, to support the integration of young Ukraine refugees into the EU labour market and ensure their experience complies with quality standards.

They mentioned that another useful QFT principle would be ensuring "break periods" between hiring trainees, or quotas, so that employers do not over-rely on trainees. To this end, additional financial support could be provided to employers to then hire young people who have completed their traineeship. For example, the SME Relief Package recently announced by the European Commission could be used for this purpose.

5. Closing remarks

Shui Beam Lam from DG EMPL thanked the participants for sharing their ideas and feedback on the QFT and said that the European Commission took note of the input.

6. Written Contributions

Participants to the validation workshop were given the opportunity to share written feedback on the key findings from the study, as summarised in the Input Paper shared ahead of the meeting. A total of three written contributions were submitted. These are summarised below.

1. Written contribution from the European Trade Union Confederation (ETUC)

In its written contribution, ETUC highlights that, when it comes to potential new QFT principles, it would be worth exploring the limit on the duration of traineeships, as well as establishing clearer rules on the number of traineeships that can be undertaken in the same sector. According to ETUC, these additions could bring an end to bad practices where employers hire already well-trained young workers for traineeships positions.

2. Written contribution from Business Europe

In its written contribution, Business Europe mentions that they consider the existing QFT principles to be valid, and that the Council Recommendation remains the right tool for simultaneously improving the quality of traineeship offerings and the learning outcomes of trainees, which helps to advance their employability and foster employment opportunities, while avoiding putting additional pressure on employers, discouraging them from offering traineeships as a result of excessive costs or administrative burden being placed upon them by regulations.

On effectiveness, Business Europe stresses that the real added value of the QFT is in ensuring that traineeships are a learning experience and are structured in a way that helps to train people in the skills needed on the labour market. However, Business Europe questions the provisional finding

that where traineeships are paid at a lower amount than unemployment benefits, young people are discouraged from undertaking them. According to them, traineeships are not jobs and therefore trainee compensation should be lower than unemployment benefits. Furthermore, traineeships as learning experiences enhance employability and employment prospects, eventually leading to increased earning potential. Furthermore, Business Europe highlights the importance of gathering additional data, particularly on open market ones, as well as on the number of applicants and the supply-demand relationship in order to better assess the need for action and further implementation of the QFT.

On efficiency, while agreeing with the overall findings, Business Europe mentions that the study should not suggest that all employers see traineeships as a way to reduce recruitment and staff costs, as in their view the main benefits of traineeships that employers concern the possibility of identifying, attracting and retaining potential new recruits and future staff.

On coherence, Business Europe stresses that the focus of the QFT on open market and ALMP traineeships continues to be appropriate and should not be broadened further.

Lastly, on relevance and EU added value, Business Europe's written contribution mentions that the existing QFT principles remain relevant and up-to-date and do not need to be adapted. Moreover, in Business Europe's view remuneration should not be considered as a criterion to assess the quality of traineeships, the content and learning outcomes of a traineeship in terms of the improved skills and knowledge of the trainee, are the determinant of the labour market chances of trainees. Furthermore, Business Europe proposes that the current Recommendation should be complemented with additional supporting actions (e.g., mutual learning activities) to raise awareness of the QFT, and foster implementation through the exchange of good practices. According to Business Europe, this could be achieved through the creation of a dedicated group of Member States and relevant stakeholders, but without creating a new permanent structure.

3. Written contribution from SMEunited

In its written contribution, SMEunited recognises the positive role of traineeships for fostering employability of young people and the EU added value of the QFT. However, they state that the QFT should remain sufficiently flexible to be adapted to the diverse types and sizes of enterprises, respect subsidiarity, and clearly ensure that traineeships remain focused on learning outcomes. To this end, SMEunited insists that an overly prescriptive approach, or legally binding measures should be avoided, as these would create more adverse effects (e.g., increased administrative and financial burden on small enterprises acting as disincentives for SMEs).

Furthermore, SMEunited's written contribution highlights the following aspects:

- Limiting the scope of the QFT to open-market and ALMP traineeships.
- The implementation of the QFT is costly for micro, small and medium enterprises, in particular in terms of administrative costs. Increasing the level of awareness of and providing financial incentives to small employers could be potential ways forward.
- The status of "trainee" and "worker" should remain distinct. Moreover, using the term 'remuneration' for trainees should be replaced by 'compensation'.
- The QFT should not include any principle on hybrid/remote traineeships as the COVID-19 measures have been lifted in most Member States.
- The ELA mandate should not be extended to cover cross-border traineeships, as there is At no sufficient data to define the need for specific policy interventions.
- There is a need to incorporate traineeships into EU wide data collection processes, to be used to inform the possible revision of the QFT.

7. Attendance

The validation workshop was attended by 36 experts and the DG EMPL and Ecorys research team.

Organisation	Country
Ministry for Technology and Industry	Hungary
Ministry of Education, Netherlands	Belgium
CNSLR Fratia	Romania
UWV/NCO EURES	Netherlands
Employment and Vocational Training Institute (Public Employment Service)	Portugal
SPANISH CONFEDERATION OF EMPLOYERS ORGANIZATIONS	Spain
Estonian Unemployment Insurance Fund	Estonia
Ministry of Labour and Social affairs	Greece
Ifjúsági Paktum Egyesület (Pact for Youth Association)	Hungary
Confederation of Danish Employers	Denmark
Confindustria	Italy
Ministry of Universities	Spain
Ministry of Labour and Social Solidarity	Romania
VDAB	Belgium
Confartigianato Imprese	Italy
UGT Spain	Spain
Ministry for Finance and Employment	Malta
Servicio Público de Empleo Estatal	Spain
Ministry for Finance and Employment	Malta
The Ministry of Social Security and Labour of the Republic of Lithuania	Lithuania
Jobsplus	Malta
Pact for Youth Association	Hungary
Federal Chamber of Labor / Arbeiterkammer	Austria
Ministry of Social Security and Labour	Lithuania
Inspección de Trabajo y Seguridad Social (Labour and Social Security Inspectorate)	Spain
Eesti Tööandjate Keskliit /Estonian Employers'Confederation	Estonia
SBB	Netherlands
MTRM	Malta
ANECA - National Agency for Quality Assessment and Accreditation	Spain
ANECA - National Agency for Quality Assessment and Accreditation	Spain
Ministry of Social Affairs	Estonia
Public Employment Service	Romania
SMEunited	EU
Eurofound	EU

BusinessEurope	EU
ETUC, European Trade Union Confederation	EU
European Youth Forum	EU
European Youth Forum	EU
Eurochambres	EU
Friedrich-Ebert-Stiftung	EU

Annex 7: Factual summary report on the public consultation for the evaluation of the Council Recommendation for a Quality Framework for Traineeships

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1. Introduction

As part of the evaluation of the Council Recommendation on a Quality Framework for Traineeships (QFT), an online public consultation was launched from 21 March 2022 to 13 June 2022. The public consultation was one of the key data collection activities of the evaluation; it aimed to gather feedback on the implementation of the QFT across Member States, its effectiveness, efficiency, relevance, coherence, and EU added value, as well as questions on possible ways forward regarding policy on quality traineeships. This report is a summary of the responses from the public consultation which gathered views from the following stakeholder groups:

- National and regional ministries involved in employment, training, education, and labour market policies
- Public employment services
- Social partners at EU and national levels
- Individual traineeship providers
- Organisations representing young people
- Trainees and young people who have had a traineeship experience or may be interested in becoming a trainee.
- EU citizens

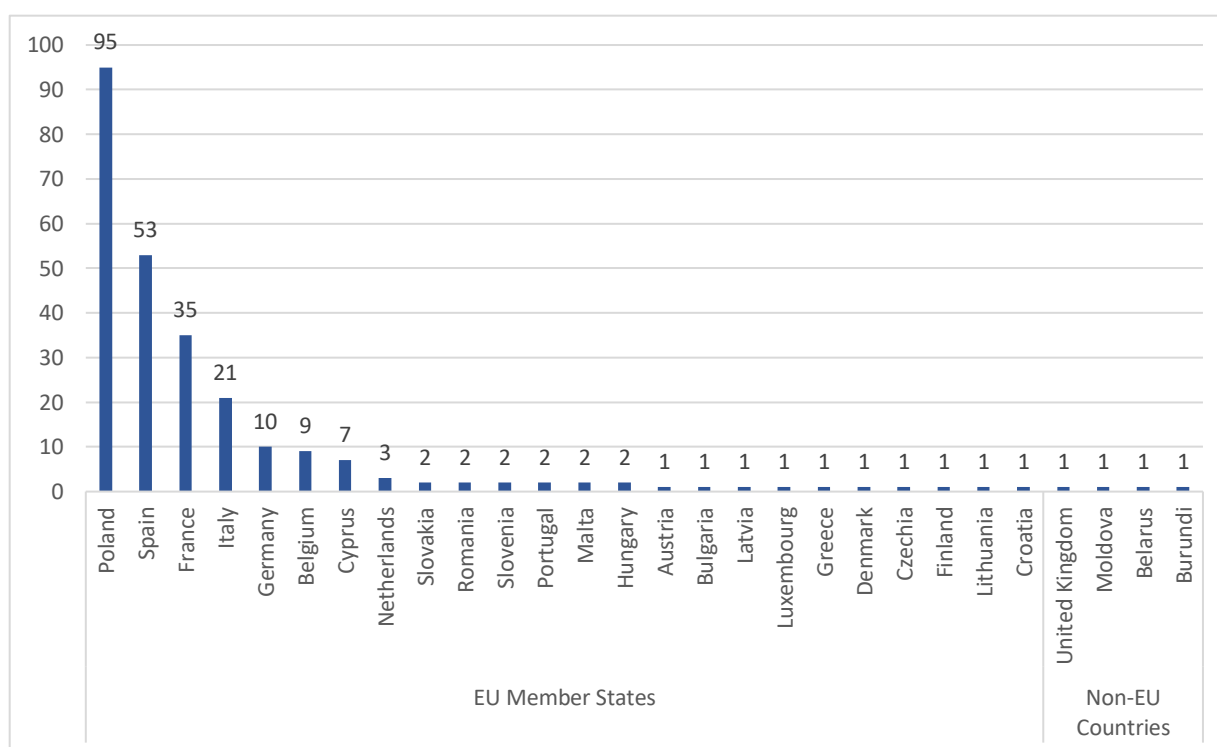
The survey included closed and open-ended questions that were filtered and routed, where necessary, to tailor the relevance of the survey to each stakeholder group. The survey was available in the 24 official languages of the EU.

Cross-tabulations between specific variables and characteristics of respondents (e.g. type of stakeholder categories, type of organisation, type of trainee and jobseeker) were also conducted, where possible, though the low number of responses has limited the possibilities for this and where this has been done results still need to be interpreted with a high degree of caution and cannot be considered representative. The responses to the closed questions of the questionnaire were analysed using Excel and R. The statistical significance of the differences observed in responses could not be further tested due to the low number of responses received.

2. Who participated in the public consultation?

This public consultation had **259 respondents**. This included 169 listed organisations (65%), 70 individuals (27%), and 20 respondents representing groups other than those listed. Respondents were from 24 EU Member States and 4 non-EU countries. 89% (230 out of 259) of responses were received from seven of the 29 countries represented, showing a somewhat unbalanced geographic distribution of responses. These seven countries are Poland (95), Spain (53), France (35), Italy (21), Germany (10), Belgium (9) and Cyprus (7). Figure 1 shows the number of responses from each country represented in the public consultation.

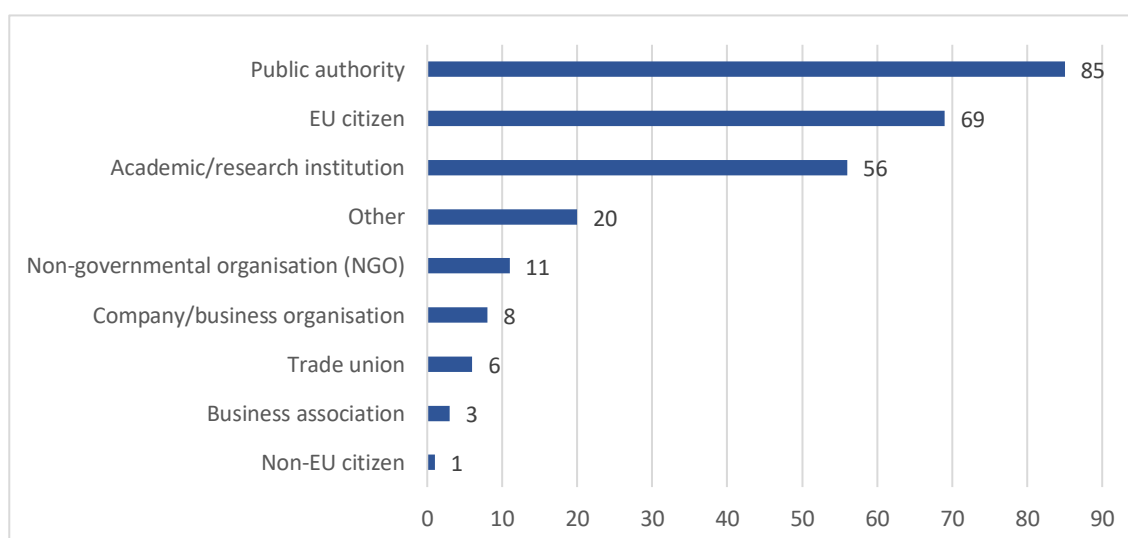
Figure 1. Breakdown of respondents by Member State



Source=QFT Public consultation 2022, N=259

The **largest group of respondents was public authorities** (85 out of 259, 33%), with the majority of the authorities representing employment services (64 out of 85, 75%), and the remainder representing national, regional and local public authorities (12 out of 85, 14%), government bodies or ministries (7 out of 85, 8%), and training or education institutions (2 out of 85, 2%). The second largest group of respondents was EU citizens (69 out of 259, 27%), followed by academic/research institutions (56 out of 259, 22%) and those who indicated they belonged to a group not listed in the questionnaire (20 out of 259, 8%). The remaining respondents represented NGOs (11 out of 259, 4%), companies/business organisations (8 out of 259, 3%), trade unions (6 out of 259, 2%), business associations (3 out of 259, 1%) and a non-EU citizen (1 out of 259, 0.4%). Figure 2 provides a breakdown of respondents by main stakeholder groups.

Figure 2. Breakdown of respondents by main stakeholder groups



Source=QFT Public consultation 2022, N=259

Organisations were asked to specify the **size of their organisation**. Of the 189 organisations that responded to the consultation, most represented medium-sized organisations with 50 – 249 employees (65 respondents; 34%). The following most represented category was small organisations with 10 to 49 employees (62

respondents; 33%), followed by large organisations with 250 employees or more (46 respondents; 24%) and micro-organisations with 9 employees or less (16 respondents; 8%). The 85 public authorities that responded were asked to indicate the **scope** of their work: 45 indicated that their organisations have a local scope (53%), 23 indicated a regional scope (27%), and 17 indicated a national scope (20%).

Individuals were asked to specify in what capacity they responded to the consultation. Of the 70 individuals that responded, 34 were either **current or former trainees** (49%). The traineeships of 22 of these respondents (65%) are/were part of an education or training programme, 3 traineeships (9%) are/were supported by an employment service, and 9 traineeships (26%) did not fit in either of those categories. 15 of the trainees had one of their traineeships at least partly abroad (44%), while 19 responded that they did not (56%).

15 of the 70 individuals (21%) that responded were individuals working in an organisation providing traineeships with 4 (27%) in a management role and 11 (73%) in a non-management role. 6 of the 70 individuals (9%) were prospective trainees or interested in doing a traineeship. The remaining individuals were jobseekers in education or training (5 of 70, 7%), in a category other than those represented in the survey (4 of 70, 6%), not looking or not available for work and not in education or training (3 of 70, 4%), or jobseekers not in education or training (3 of 70, 4%).

The public consultation also received four position papers from Fundación Secretariado Gitano (FSG), ETUC, the group of Spanish Universities and the Coimbra Group.

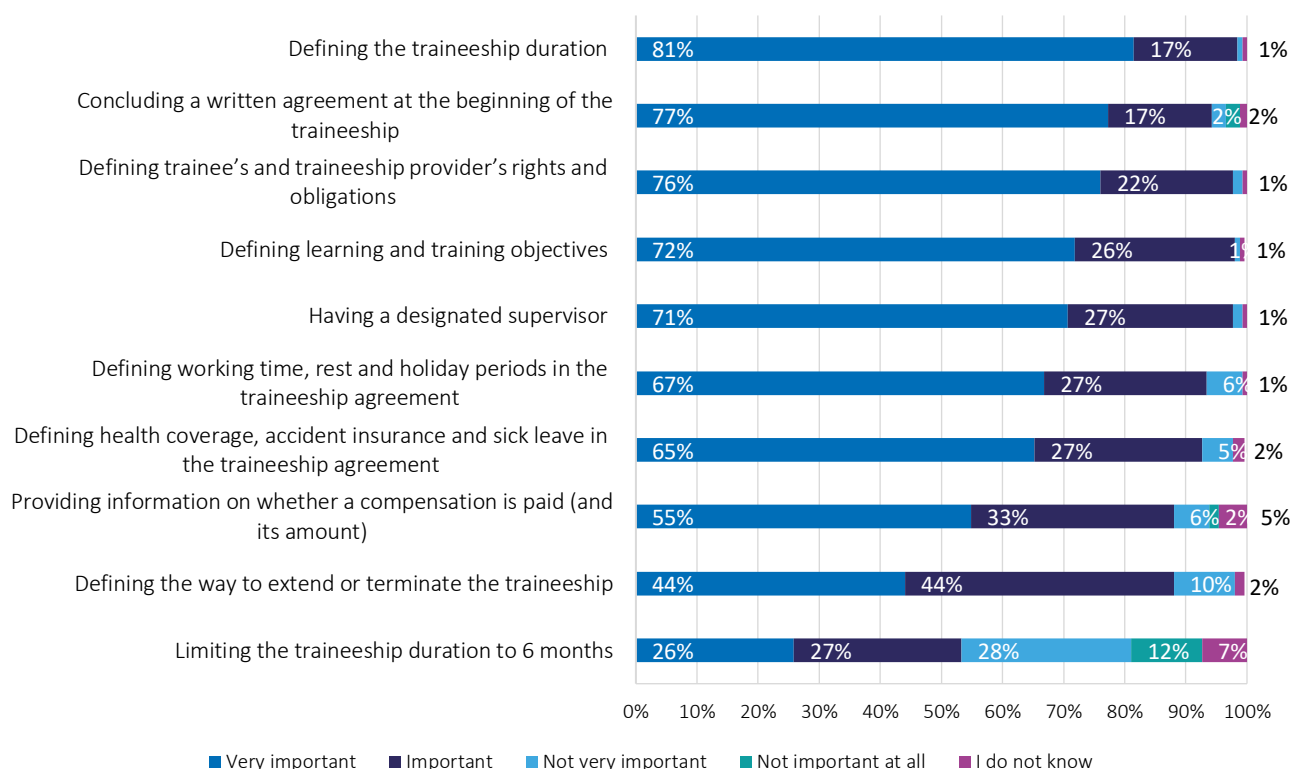
3. Responses to the consultation

3.1. How relevant is the QFT?

Respondents were asked about the perceived importance of each of the ten principles of the current QFT in order to assess the overall relevance of the Recommendation as well as possible additional quality principles currently not covered by the QFT.

Agreement between trainee and traineeship provider

Figure 3. How important are the following principles for increasing the quality of traineeships in your country/the EU? - Agreement between trainee and provider



Source=QFT Public consultation 2022, N=259

As regards to the agreement between the trainee and the traineeship provider, figure 3 shows that defining the traineeship duration was the principle most frequently deemed very important (211 respondents out of 259, 81%), followed by concluding a written agreement at the beginning of the traineeship (200 out of 259, 77%) and defining trainee's and traineeship provider's rights and obligations (197 out of 259, 76%). The principle most frequently deemed not important at all was limiting the traineeship duration to 6 months, with 30 respondents out of 259 (12%) selecting this option. However, this principle was also the one for which most respondents (19 out of 259, 7%) chose "do not know".

An in-depth analysis of the scope of the organisations taking part in the consultations highlights that at the **national level**, the majority of organisations (94%, 16 out of 17) considered that defining traineeship duration and the learning and training objectives as very important. Limiting traineeship duration to 6 months was not considered very important by 2 respondents (12%) or not at all important by one (5%). Organisations at the **regional level** were more likely to indicate that defining trainees' and traineeship providers' rights and obligations and having a written agreement were very important (87%, 20 out of 23). Similarly, limiting traineeship duration was believed to be not very important (26%, 6 out of 23) or not important at all (4%, 1 out of 23). In comparison, at the **local level** organisations most frequently selected defining trainee's and traineeship provider's rights and obligations as very important (93%, 42 out of 45) whilst having a written agreement was not considered important at all (7%, 3 out of 45).

Most respondents representing **public authorities** (77 out of 85, 91%) considered defining trainees' and traineeship providers' rights and obligations very important followed by defining the traineeship duration, which was selected by 74 respondents (87%). In comparison, limiting the traineeship duration to 6 months was considered not very important by 18 respondents within this group (21%) or not important at all (4 out of 85, 5%).

Among **academic/research institutions**, 45 out of 56 (80%) found defining traineeship duration as very important followed by having a written agreement (43 out of 56, 77%). In contrast, 19 out of 56 (34%) in this group considered that limiting the traineeship duration to 6 months was not very important and 12 thought it was not important at all (21%).

Similarly, two out of three (67%) **business associations** reported that defining traineeship duration as very important as well as providing information on compensation is paid (67%). Limiting the traineeship duration to 6 months was again found as not very important by two respondents (67%). Seven out of eight **companies/business organisations** (88%) indicated that defining learning and training objectives and providing information on compensation is paid were very important. In terms of the principles considered not very important, four respondents (50%) expressed a similar opinion that limiting traineeship duration was not very important and one rated it as not important at all (13%). Among the five respondents representing **enterprises** offering traineeships, two (40%) stated that defining the way to extend or terminate the traineeship was very important, two (40%) that it was important whilst one (20%) found this principle not very important. All five respondents representing enterprises providing traineeships found defining working time, rest and holiday periods either important (3, 60%) or very important (2, 40%).

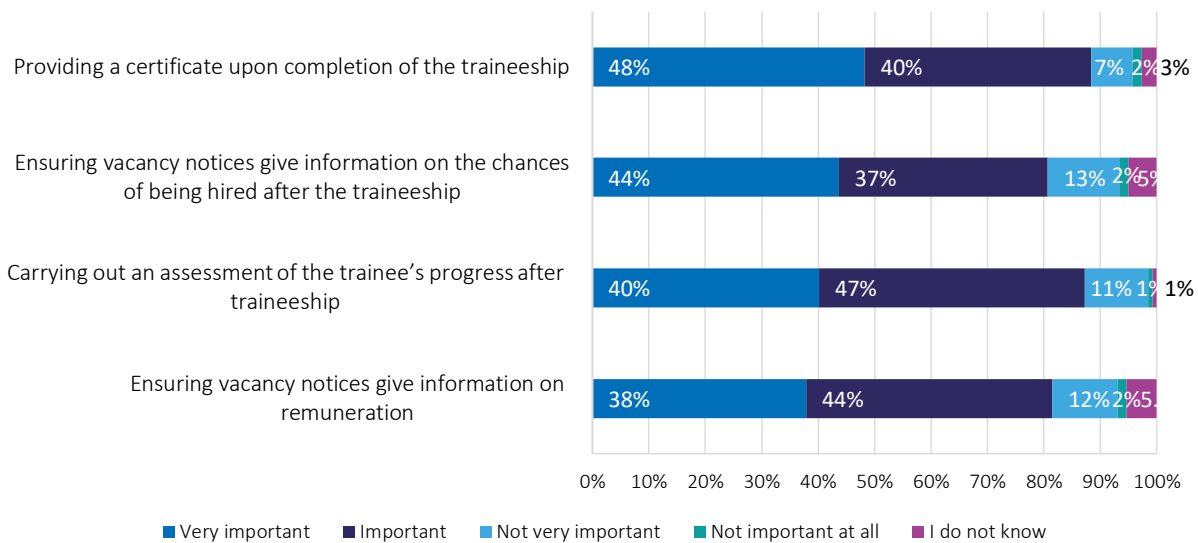
All **trade union representatives** reported that defining health coverage, accident insurance and sick leave was very important (6, 100%), as well as specifying learning and training objectives (6, 100%). Two respondents out of 6 (33%) thought that limiting the duration to 6 months was not very important and one (17%) considered that defining how to extend or terminate the traineeship was not very important.

The majority of **former or current trainees** (82%, 28 out of 34) indicated that defining traineeship duration was very important, followed by providing information on compensation is paid (24, 71%) and having a written agreement (24, 71%). Defining learning and training objectives was the principle most selected as 'important' (15 out of 34, 44%). Trainees considered that defining the way to extend or terminate the traineeship (7, 21%) and limiting the traineeship duration to 6 months (7, 21%) were not very important. Furthermore, 21% (7) also reported that limiting the duration was not important at all. Among **prospective trainees** and those interested to undertake a traineeship, 5 out of 6 (83%) indicated that defining the traineeship duration is very important and 4 (67%) thought that defining trainee's and traineeship provider's rights and obligations was important. Limiting the traineeship duration to 6 months was considered not very important (4, 67%) and not important at all (1 out of 6, 17%).

Among **jobseekers**, those in education or training reported that receiving information on whether compensation is paid (5 out of 5, 100%) and having a written agreement (5, 100%) was very important. All jobseekers who reported not being in education or training rated all principles as very important (3 out of 3, 100%), with the exception of having a designated supervisor which two respondents (67%) selected as very important, and limiting traineeship duration to 6 months which was considered very important by one jobseeker (33%). However, limiting the duration was also reported as not very important by one jobseeker not in education or training (1 out of 3, 33%) and not important at all by one in education or training (1 out of 5, 20%).

Traineeship providers

Figure 4. How important are the following principles for increasing the quality of traineeships in your country/the EU? - Regarding traineeship providers



Source=QFT Public consultation 2022, N=259

Providing a certificate upon completion of the traineeship was the principle that most respondents found very important (125 respondents out of 259, 48%), followed by ensuring vacancy notices give information on the chances of being hired after the traineeship (113 respondents out of 259, 44%). Carrying out an assessment of the trainee's progress after traineeship was the principle most frequently deemed as important (112, 47%). In contrast, ensuring that the vacancy notices give information on the chances of being hired was also thought to be not very important by 13% (33) of respondents.

Among representatives of **public authorities**, 43 out of 85 (51%) considered that ensuring the vacancy notices give information on the chances of being hired was very important, whilst carrying out an assessment of trainee's progress was most frequently selected as 'important' (48, 56%). Ensuring the vacancy notices give information on remuneration was considered not very important by 12% of respondents in this group (10 out of 85).

More than half of **academic/research institutions** (34 out of 56, 64%) taking part in this public consultation indicated that providing a certificate upon completion was very important, followed by carrying out an assessment (28, 50%). Ensuring the vacancy notices give information on the chances of being hired after the traineeship was most likely to be considered as not very important (12, 21%) or not important at all (3, 5%).

Two out of three respondents (67%) representing **business associations** reported that providing a certificate upon completion and carrying out an assessment were important, whilst giving information on the chances of being hired in the vacancy notice was not very important (2 out of 3, 67%). Among **companies/business organisations**, three out of eight (38%) respondents thought that carrying out an assessment was very important, whilst six (75%) indicated that giving information on remuneration was important. However, among this group one respondent (13%) also considered that this principle is not important at all. Four out of five respondents (80%) representing **enterprises** providing traineeships found the provision of a certificate upon completion of the traineeship as important, whilst one (20%) found this not very important.

The representatives of **trade unions** were more likely to select that providing a certificate upon completion and carrying out an assessment of trainee's progress as 'very important', with 67% (4 out of 6 respondents selecting this). None of the principles were rated as not very important or not important at all.

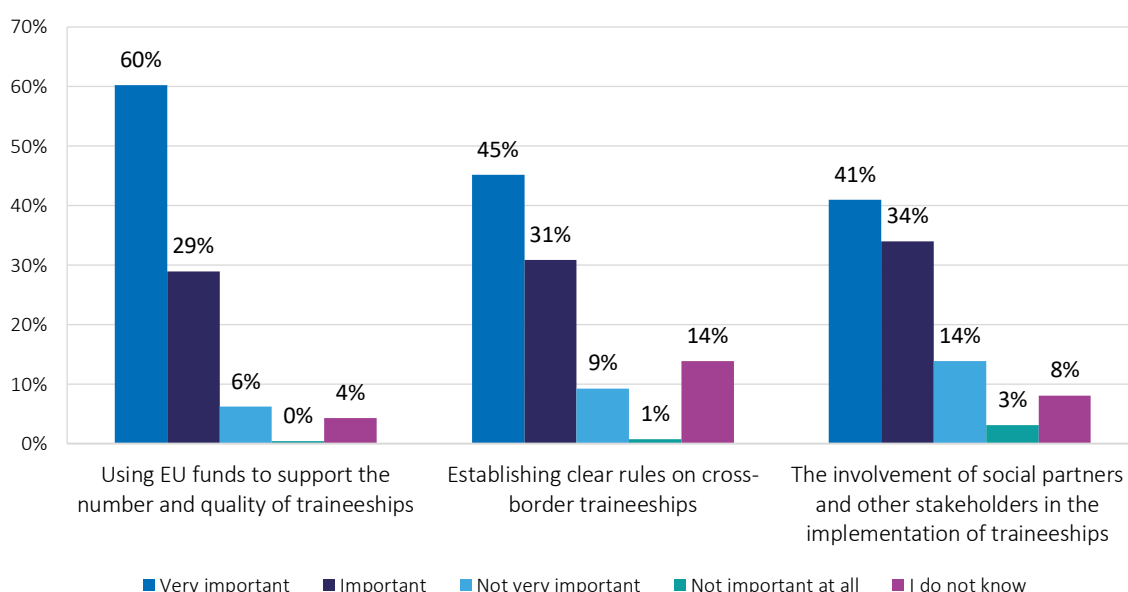
Almost half of **former or current trainees** (14 out of 34, 41%) stated that vacancy notice giving information on the chances of being hired after the traineeship was very important as well as providing a certificate upon completion (14, 41%). Carrying out an assessment was most frequently rated as important by respondents in this group (17, 50%). However, providing a certificate upon completion was also selected as not very important by most trainees (9, 26%).

Half of **prospective trainees** (3 out of 6) rated all principles regarding traineeship providers as very important, with the exception of carrying out the assessment which was considered very important by 2 prospective trainees (33%). Giving information on the chances of being hired in the vacancy notice was rated as not important at all by one respondent (17%).

Among **jobseekers not in education or training**, all respondents considered the principles listed as very important. Similarly, most jobseekers (4 out of 5, 80%) participating in education or training rated all principles as very important. One exception was 'carrying out an assessment of the trainee's progress after traineeship' which was most frequently reported as 'important' (3 out of 5, 60%).

Governance of traineeships

Figure 5. How important are the following principles for increasing the quality of traineeships in your country/the EU? – Governance of traineeships



Source=QFT Public consultation 2022, N=259

As regards the governance of traineeships, the majority of respondents (60%, 156 out of 259) stated that using **EU funds** to support the number and quality of traineeships was very important. This was followed by establishing clear rules on cross-border traineeships, which 45% (106) of respondents rated as very important. The involvement of social partners and other stakeholders was most frequently rated as 'important' (34%, 88).

The majority of **public authorities** (52 out of 85, 61%) represented stated that using EU funds to support the number and quality of traineeships was very important, whilst the involvement of social partners and other stakeholders was most frequently rated as important (32, 38%). However, the involvement of other stakeholders was also more likely to be rated as not very important (14, 16%) or not important at all (5, 6%).

Similar views were shared among **academic/research institutions**. The vast majority (41 out of 56, 73%) considered using EU funds as very important and 41% (23) rated the involvement of social partners and other stakeholders as important. This principle was also selected as not very important by 9 respondents within this group (16%).

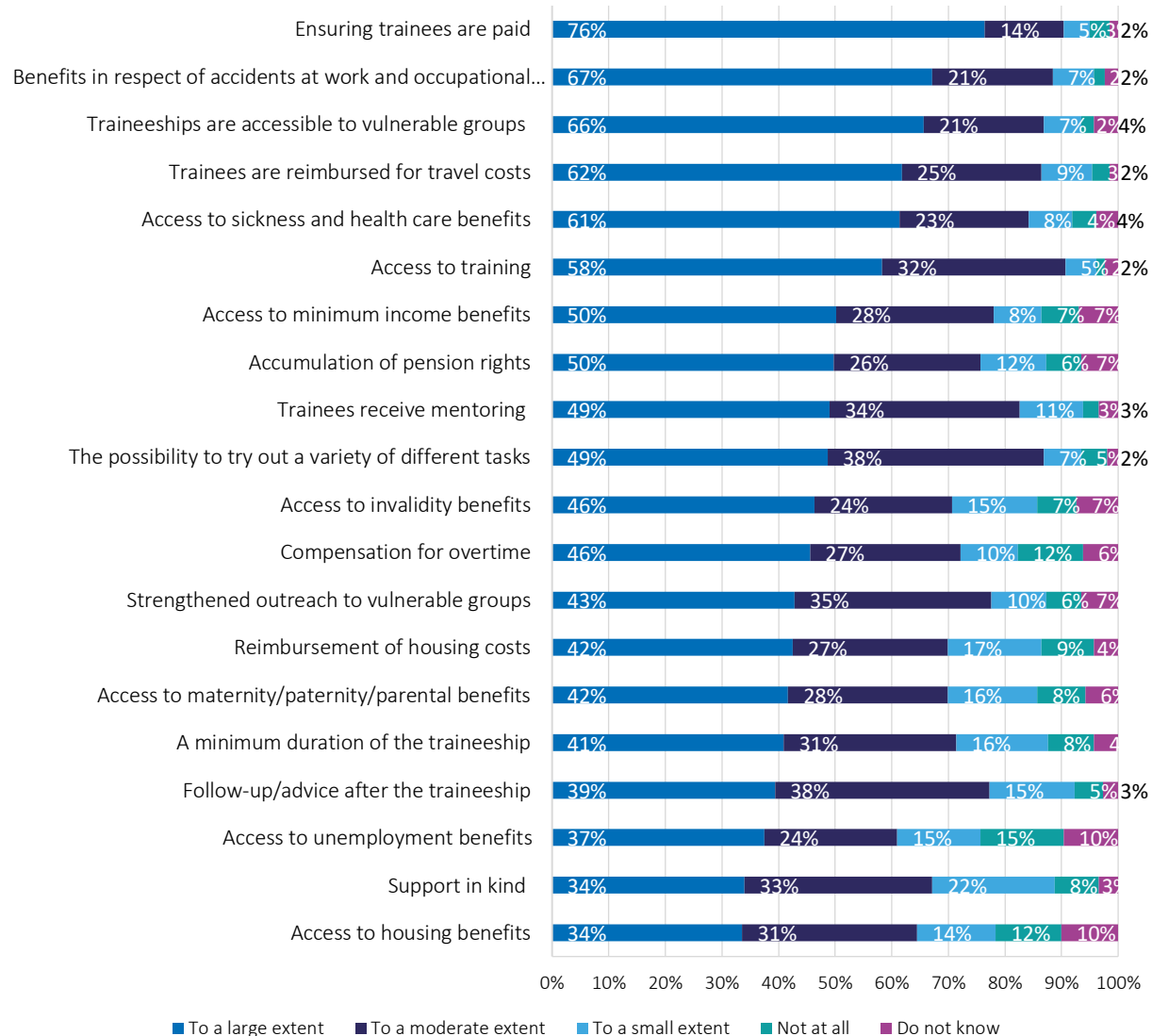
Among **business associations**, two out of three respondents (67%) thought that the involvement of relevant stakeholders as very important, while the same percentage considered that establishing clear rules on cross-border traineeship was not very important. Furthermore, six respondents out of eight (75%) representing **companies/business organisations** indicated that using EU funds to support the supply and quality of traineeships and establish clear rules on cross-border traineeships as very important. One respondent (13%) rated each of the four principles concerning the governance of traineeships as not very important.

All **trade union representatives** (6 out of 6, 100%) considered the involvement of social partners and other stakeholders as very important for the implementation of traineeships. None of the principles were rated as not important.

Among former or current **trainees**, 14 out of 34 (41%) considered that using EU funds to support the number and quality of traineeships was very important, while the involvement of social partners and other stakeholders was most frequently selected as important (12, 35%). In comparison, only one respondent within this group (3%) rated the involvement of relevant stakeholders and use of EU funds as not important at all.

Additional principles not included in the QFT

Figure 6. Would any of the following elements, currently not required by the QFT, increase the quality of traineeships?



Source=QFT Public consultation 2022, N=259

The survey also asked about views on principles not included in the current QFT, that would increase the quality of traineeships. 76% of respondents (198 out of 259) stated that ensuring trainees are paid would increase the quality of traineeships to a large extent, including three out of five (60%) enterprises offering traineeships. Access to unemployment benefits was the element not included in the QFT that respondents most frequently declared would not at all increase the quality of traineeships (38 out of 259, 15%).

Among **public authorities**, the vast majority of respondents (77 out of 85, 91%) considered that ensuring trainees are paid would increase the quality of traineeships by a large extent. In comparison, providing compensation for overtime was most frequently selected as not improving the quality at all (15, 18%).

Representatives of **academic/research institutions** considered that benefits in respect of accidents at work or occupational diseases (39 out of 56, 70%) and ensuring that traineeships are accessible to vulnerable groups (39, 70%) are to a large extent contributing to the enhanced quality of traineeships. Offering access to unemployment benefits was not considered to improve traineeship quality at all (11, 2%).

Two in three **business associations** (67%) taking part in the consultation considered the elements ensuring that traineeships are accessible to vulnerable groups as improving the quality to a large extent. Within **companies/business organisations**, 6 out of 8 respondents (75%) rated access to training as contributing to a large extent. Access to maternity/paternity/parental benefits (3 out of 8, 38%) was most frequently selected as not enhancing traineeship quality at all. The view most frequently held among **enterprises** offering traineeships was that access to unemployment benefits would increase the quality of traineeships to a small extent (2 out of five, 40%).

All **trade union** representatives (6 out of 6, 100%) rated the following elements as improving the quality of traineeships to a large extent: access to minimum income benefits, access to sickness and health care benefits, access to unemployment benefits and ensuring trainees are paid. One respondent reported that support in kind (17%) would not enhance the quality at all.

Among the 34 former or current **trainees** consulted, 26 (76%) found that offering benefits in respect of accidents at work or occupational diseases would increase the quality of traineeships to a large extent. This was followed by: ensuring trainees are paid (25, 74%) and ensuring traineeships are accessible to vulnerable groups (25, 74%). Eight out of 34 respondents (24%) in this group considered that access to unemployment benefits with not increase the quality at all.

Most of the **prospective trainees** (5 out of 6, 83%) selected reimbursement of housing costs at contributing to the traineeship quality to a large extent. The element most frequently selected at not at all enhancing the quality was ensuring a minimum duration of the traineeship (3 out of 6, 50%).

All **jobseekers** not in education or training rated all elements listed as improving traineeship quality to a large extent. The exceptions were reimbursement of housing costs which was thought to contribute to a moderate extent by one jobseeker (33%) and support in kind which was selected as only enhancing quality to a small extent (1, 33%). Among those in education or training, ensuring trainees are paid (5 out of 5, 100%) and accessibility to vulnerable groups (5, 100%) was considered as a contributing factor to a large extent. In comparison, the following elements were each selected by one jobseeker (20%) as not enhancing quality at all: access to sickness and health care benefits, follow-up/advice after the traineeship, strengthened outreach to vulnerable groups and mentoring.

Position papers were submitted in response to the consultation by the European Trade Union Confederation (ETUC) and the Friedrich Ebert Stiftung's Competence Centre on the Future of Work. Their campaign advocates for the creation of a binding legal tool to ban unpaid "open market traineeships"¹ and ensure that internships do not replace entry-level jobs². Furthermore, the Coimbra Group also argued in their position paper that a minimum element that should be mandatory is that trainees should be paid.

¹ Open-market traineeships are defined as non- mandatory, bilateral, and private agreements between a trainee and an employer. These have no formal connection to either a recognised education or training course or an active labour market policy.

² Entry level jobs are defined as either a role that requires no experience or related education, or an entry point to a career that requires minimum education and experience in order to qualify.

Potential trainees were then asked why they had not yet participated in a traineeship. The reason most frequently given was that the traineeship(s) found was/were unpaid or not paid enough (3 responses out of 6, 50%). Each other reason ("I was looking for/I have applied for a traineeship, but I was not selected", "I was supposed to do a traineeship, but opted for something else at the time", "The duration of the traineeship(s) I found was not in line with my needs") was selected by one respondent out six (17%).

Box 1: Analysis of other elements that would increase the quality of traineeships

A total of 68 responses were received to this open ended question. Most responses (17) considered that better pay, either matching minimum wage or being closer to the minimum wage, would enhance the quality of traineeships. Among these, 6 were public authorities, 6 EU citizens, 3 other organisations, 1 NGO and 1 trade union.

Prioritising trainee learning was another element mentioned by 4 EU citizens, 3 academic/research institutions and 1 NGO. Ensuring employment opportunities following the traineeship was rated by public authorities (4) as an element that would increase the quality of traineeships, as well as by 2 EU citizens and 1 NGO. Across different stakeholders, ensuring trainees are not used as a form of cheap labour was mentioned as a factor enhance traineeship quality (1 NGO, 2 EU citizen, 1 trade union and 1 company).

Other elements mentioned were a stronger enforcement of traineeship policies (5), enhancing the accessibility of traineeships (3) and incenting organisations offering traineeships (3).

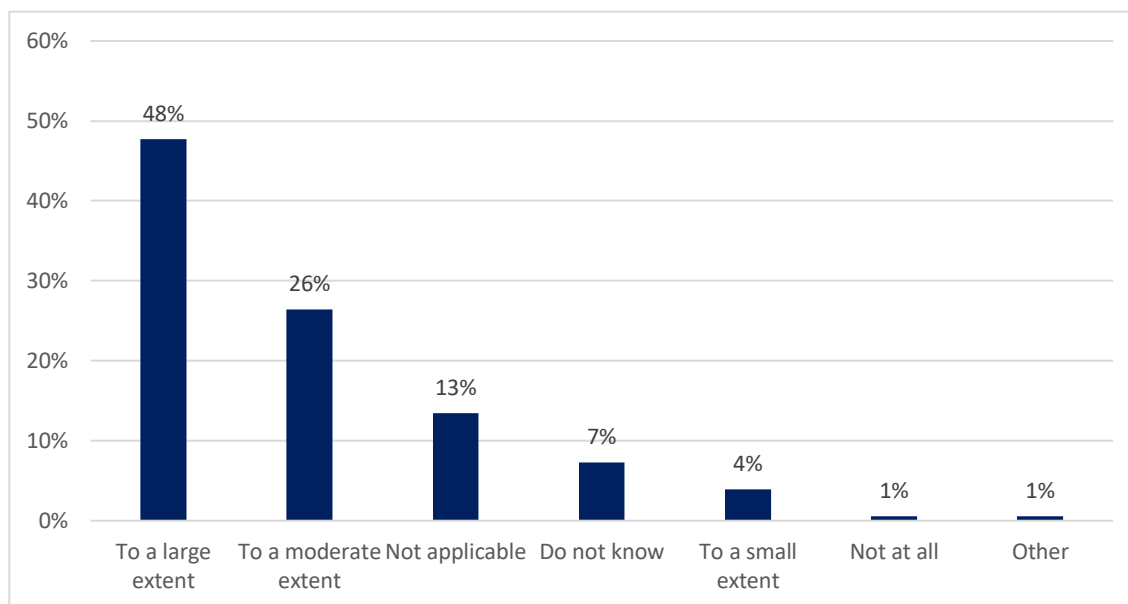
3.2. How effective is the QFT?

To determine the effectiveness of the QFT, the public consultation asked respondents to assess the extent to which QFT principles are present in national legislation or quality frameworks and the degree to which there are mechanisms in place to ensure employers comply with legislation. However, no responses were received for these two questions.

The survey then asked respondents representing **organisations** to rate the extent to which traineeships in their organisation complied with the QFT principles. A total of 178 responses were received, including 81 responses from public authorities, 54 from academic/research institutions, 20 from other organisations than those listed, 8 companies/business organisations, 7 NGOs, 5 from trade union representatives and 3 business associations.

The majority of respondents indicated that traineeships complied with the QFT principles to either a large extent (48%, 85 respondents) or moderate extent (26%, 47). A small share (5%, 8) considered that traineeships in their organisation complied only to a small extent or not at all, whilst 13% (24) selected not applicable.

Figure 7. To what extent do traineeships in your organisation comply with the QFT principles?



Source=QFT Public consultation 2022, N=178

The responses to this question were further disaggregated by type of **organisation**. This variable was created by analysing the number of responses to the following question: *'Can you specify further the capacity in which you are replying to this questionnaire?'*. A total of 104 responses were received from the following types of organisations: employment services (62), other public authority (10), social partners (9), government body (7), NGOs (6), private enterprise (5), vocational Education and Training / Higher Education institution (4) and other training institution (1).

Among **employment services**, 65% (40 out of 62) considered that the traineeships in their organisation complied with QFT principles to a large extent, while 18% (11 out of 62) thought it complied to a moderate degree. Only a small share (1 out of 62, 2%) considered that the traineeships provided by their organisation did not comply at all with the principles.

Respondents from **government bodies or ministries** were more likely to select 'not applicable' (3 out of 7, 43%), whilst 29% indicated that their organisation complied to a moderate extent (2 out of 7). 40% of respondents (4 out of 10) representing **other public authorities** reported that their organisation complied to a moderate extent, 20% (2 out of 10) to a large extent and 30% (3 out of 10) indicated that it was not applicable to them.

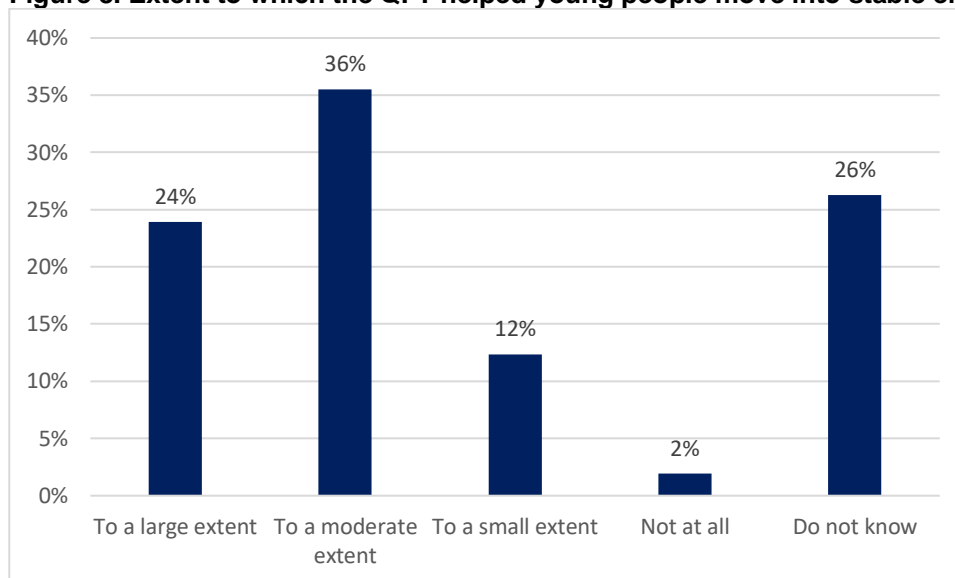
The majority of **NGOs** representatives (4 out of 6, 67%) reported that their organisation complied to a large extent with the QFT principles and 17% (1 out of 6) considered that their compliance was to a moderate degree.

Around a third of **social partners** (3 out of 9, 33%) represented in the public consultation reported that the traineeships in their organisation complied with the principles to a large extent; 22% (2) rated their compliance to a moderate extent and 11% (1) to a small extent.

Based on the analysis of responses, traineeships in the **vocational education and training/ higher education institutions** taking part in the consultation complied to a large extent as rated by 25% (1 out of 4) of respondents and to a moderate extent as reported by 50% (2) of respondents.

Finally, all respondents (5 out of 5) from **public enterprises** believed that their organisation complied to a large degree with QFT principles. Less than 1% (1 out of 104) of respondents across all types of organisations considered their traineeships complied only to a small degree or not at all.

Figure 8. Extent to which the QFT helped young people move into stable employment



Source=QFT Public consultation 2022, N=259

More than a third of all respondents to the public consultation (259) reported that the QFT helped young people move into stable employment to a moderate extent (36%, 92), whilst 26% (68) did not know. A smaller share (24%, 62) thought the QFT helped young people to large extent to find a job and around 14% (37) considered the QFT to have contributed to a small extent or not at all.

Among the types of stakeholders who participated in the consultation, **public authorities** were more likely to report that the QFT helped young people to secure employment to a large extent (31%, 26 respondents out of 85) and to a moderate extent (48%, 41). Only 6% (5) indicated that the QFT only supported to a small extent.

The majority of **business associations** (67%, 2 out of 3) indicated that the QFT helped to a moderate extent whilst the remaining one third (33%, 1 out of 3) reported that they did not know. **Companies/business organisations** were more likely to select 'to a moderate extent' (50%, 4 out of 8), whilst a quarter (25%, 2) considered the QFT had contributed to a large extent and 13% (1) thought it helped to a small extent.

In comparison, 83% of respondents representing **trade unions** indicated that the QFT helped to a small extent or not at all (5 respondents out of 6). Only 17% (1 out of 6) considered that the framework supported young people moving to employment to a large extent. EU citizens were more likely to report 'do not know' (41%, 28 out of 69).

When asked whether the implementation of the QFT had a positive effect on traineeships in their sector, 39% of respondents representing organisations (69 out of 178) agreed that the QFT had a positive impact. However, the same percentage of respondents also selected 'do not know' when asked this question. Only 6% (10 out of 178) considered that the QFT did not have a positive impact.

Among **public authorities**, 38% of respondents (31 out of 81) thought that the framework had a positive effect. This was followed by 35% (28) who did not know how to assess its impact and 23% (19) who selected 'not applicable'.

Academic/research institutions were more likely to indicate that they did not know whether the QFT had a positive impact (49%, 26 out of 53). However, 40% (21) of respondents in this group did consider that the framework had a positive impact.

The vast majority of **business association** representatives (67%, 2 out of 3) did not consider the question applicable for their sector and the remaining 33% (1) thought the implementation had positive effects on traineeships. More than half of **companies/business organisations** (63%, 5 out of 8) did not know whether the QFT had a positive impact, 25% (2) gave a positive answer and 13% (1) did not consider the framework to have had a positive effect.

More than half of **NGOs** (57%, 4 out of 7) considered that the QFT had a positive effect, whilst 43% (3) selected 'do not know'. Half of **trade union** respondents disagreed with the statement (50%, 3 out of 6). However, 33%

(2 out of 6) considered that the QFT implementation had a positive effect in their sector. One in six (17%) did not know how to assess its impact.

The consultation further asked **organisations** whether the QFT had a negative impact on traineeships in their sector. A total of 169 responses were received to this question. The largest share of respondents (42%, 71 out of 169) concluded that the QFT did not have a negative impact and 40% (67 out of 169) did not know. Only 3% (5 out of 169) of respondents believed that the framework had a negative effect within their sector.

Only one percentage (1 out of 76) of **public authorities** considered that the QFT implementation had a negative effect on traineeships. In comparison, 42% (32 out of 76) disagreed with the statement and 37% (28) did not know how to assess its impact. A further 20% (15) indicated that the statement was not applicable.

Almost half of the respondents (48%, 25 out of 52) representing **academic/research institutions** reported that the QFT implementation did not have a negative effect. A slightly smaller share (40%, 21) selected 'do not know' and 2% (1) considered that the implementation had a negative effect.

Most **business associations** (67%, 2 out of 3) did not consider the statement applicable to their sector and 33% (1) reported that the implementation did not have any negative impact. More than half of **companies/business organisations** (57%, 4 respondents out of 7) did not agree that the QFT had a negative impact on traineeships in their sector.

A similar view was shared by NGOs, in which case 57% of respondents (4 respondents out of 7) did not consider that the implementation had a negative impact on traineeships. The remaining three respondents (43%) did not know how to assess the impact of the framework.

There were mixed views among **trade union** respondents with 20% (1 out of 5) indicating that the QFT had a negative effect whilst the same share disagreed and 40% (2 out of 5) selected 'do not know'. The remaining 20% (1) considered the statement not to be applicable to their organisation.

Box 2: Analysis of open-ended answers on positive/negative effects of QFT

The analysis of qualitative responses highlights the role of the QFT as a point of reference to guide company practices and providing more clarity for relevant stakeholders (11 respondents including 6 public authorities, 2 NGOs, 1 academic/research institutions and 1 other organisation than those listed) as well as promoting the quality of traineeships (10) which was mentioned by a mix of public authorities, businesses, trade unions and academic institutions. Respondents also considered that the QFT had influenced certain Member States and sectors (4) and overall streamlined the implementation of traineeships (2).

Whilst most respondents emphasized the positive impact of the framework, some indicated that the QFT had little impact (6) as it is not binding, or it was not implemented. Among these, there were 2 trade unions, 2 academic/research institutions, 1 public authority and 1 NGO. Respondents also indicated that additional provisions are needed (7 incl. 4 EU citizens and 3 public authorities). The analysis also highlighted that in some cases there was not sufficient data to determine the negative effects (6 incl. 5 public authorities and 1 academic/research institute). Finally, 1 respondent highlighted a possible negative impact on employees who might become less motivated, and 1 respondent thought that too many provisions might discourage employers from providing traineeships.

3.3. How efficient is the QFT?

The public consultation asked respondents representing organisations to assess the efficiency of the QFT by determining the level of costs and benefits and the extent to which the QFT contributed to achieving these benefits. A total of 184 responses were received to this question.

Almost half of the respondents out of 184 (48%, 89) concluded that there were administrative costs associated with the implementation of the QFT (i.e. paperwork, submission of reports, application of grants, cooperation with inspection by public authorities, etc.), while 20% (37 of 184) did not consider that there were any costs incurred in the implementation process. Around 16% (30 out of 184) did not have knowledge on the administrative costs and 15% (28 out of 184) selected 'Not applicable'.

Public authorities (45%, 37 out of 83) were more likely to report that there were costs associated with the implementation. Less than a quarter of respondents (23%, 19) indicated that there were no costs, 16% (13) did not know and 17% (14) indicated that it was not applicable.

More than half of the **academic/research institutions** (30 out of 55) acknowledged there were costs incurrent from the QFT implementation; 20% (11) reported no costs; 16% (9) did not know and 9% (5) selected 'not applicable'.

Among **business associations** the same percentage of respondents (33%, 1) reported there were costs associated with the QFT, no costs (33%, 1) and one respondent thought the statement was not applicable. The vast majority of **companies/business organisations** (75%, 6 out of 8) agreed that there were administrative costs involved, 13% (1) did not know and 13% (1) selected 'not applicable'.

The majority of **NGOs** (67%, 6 out of 9) agreed that the QFT implementation led to administrative costs, 22% (2) did not know and 11% (1) thought it was 'not applicable'.

Half of **trade union** representatives (3 out of 6) indicated that the statement was not applicable for their organisation, 33% (3) agreed that there were costs incurred whilst 17% (1) disagreed.

The respondents who considered that there were costs associated with the implementation of the QFT (89) were then prompted to assess how high these costs were. More than a third of them reported that the costs were quite high (37%, 33 out of 89) and very high (4%, 4 out of 89). Moreover, 18% of the 89 respondents did not know the cost level and a small share (6%, 5 out of 89) thought the administrative costs were very low.

Further analysis by stakeholder group showed that there were mixed views among **public authorities** in regard to how high the costs were: 38% (14 out of 37) of public authorities selected 'quite high' whilst 32% (12) of the same group indicated that the costs were 'quite low'.

Furthermore, 40% (12 out of 30) of **academic institutions** reported the costs to be 'quite high' whilst 33% (10) selected 'quite low'. 13% (4) of respondents indicated that they did not know.

One **business association** (out of 1) reported that it did not know how high these costs were. The majority of **company/business organisation** representatives indicated that the costs were quite high (67%, 4 out of 6), followed by very high (17%, 1) and quite low (17%, 1).

Half of the **NGOs** responding to this question considered the costs to be quite low (50%, 3 out of 6) whilst 17% (1) thought they were quite high and 17% (1) very low.

Among **trade unions**, half of respondents reported the costs to be quite low (50%, 1 out of 2) whilst the remaining half did not know how to assess these costs.

The organisations responding to the consultations were asked to rate the benefits of implementing the QFT for their organisation. A total of 177 responses were received to this question. More than half of the **organisations** rated the benefits of implementing the QFT as quite high (44%, 77 out of 177) or very high (14%, 25 out of 177). Around 20% (36 out of 177) of respondents indicated that they did not know and 15% (26 out of 177) selected 'Not applicable'. Only 8% (13 out of 177) rated the benefits for their organisation as quite low or very low.

Almost half of **public authorities** (47%, 37 out of 79) rated the benefits of implementing the QFT as quite high, 11% (9) thought they were very high, 4% (3) reported them as quite low, whilst 25% (20) did not know and 13% (10) thought the question was not applicable to them.

The majority of **academic/research institutions** indicated that the benefits were wither very high or quite high (58%, 32 out of 55). A smaller share (9%, 5) rated them as quite low and 2% (1) thought the benefits were very low.

There were mixed views among **business associations** as half of respondents (1 out of 2) reported that the benefits of QFT were quite high and the remaining half thought they were quite low. The vast majority of **companies/business organisations** rated the benefits as either very high (25%, 2 out of 8) or quite high (63%, 5). No respondent within this group considered that the benefits were low.

Half of **NGOs** representatives rated the benefits associated with the QFT implementation as quite high (4 out of 8), whilst 25% (2) thought they were quite low and 25% (2) selected 'not applicable'.

Most of **trade union** representatives (93 out of 6) reported that the question was not applicable to their situation, 33% (2) considered the benefits as quite high and the remaining 17% (1) rated them as high.

Furthermore, the survey requested organisations to rate the costs of implementing the QFT as compared to

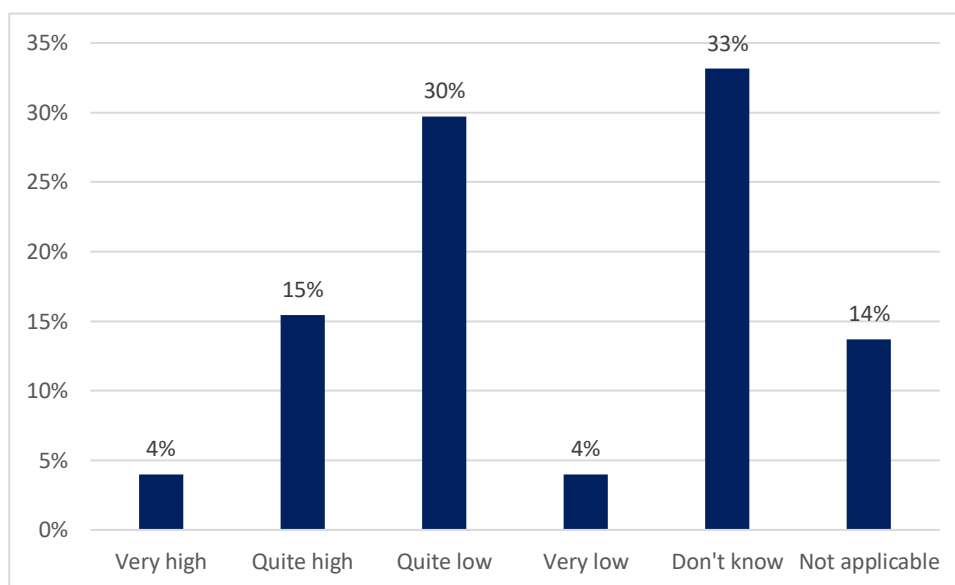
Box 3: Analysis of open-ended answers on the costs and benefits of the QFT

The main benefit of implementing the QFT was the provision of a framework of rules and objectives for organisations and setting clear expectations for all stakeholders involved (11, incl. 7 public authorities, 2 academic/research institutions and 1 NGO). Respondents also emphasized the role of the QFT in enhancing the quality of traineeships (8, including 4 public authorities, 2 academic/research institutes, 1 NGO and 1 trade union) by promoting fair working conditions and setting minimum requirements and benefits for trainees (5, including 3 public authorities and 2 NGOs), which include more awareness of their rights, better preparation and learning opportunities and additional protections in place. Other benefits mentioned were the higher employability of trainees (3) and the possibility of cross-border cooperation (2).

Among the main costs highlighted by respondents in the open-ended questions were the expenses related to reporting and documentation (7) and personnel costs (4). The administration of ERASMUS traineeships (2 academic/research institutions) and using intermediaries to find traineeship providers (2 academic/research institutions) were also associated with the QFT implementation.

the benefits. A total of 175 responses were received.

Figure 9. Proportionality of costs as compared to the benefits of implementing the QFT



Source=QFT Public consultation 2022, N=175

As illustrated by figure 9, in terms of the proportionality of the costs incurred from the QFT implementation, the highest share of organisations (34%, 59 out of 175) rated the costs when compared to the benefits as quite low or very low. A third of organisations (33%, 58 out of 175) did not know how to rate these administrative costs. Around 19% (34 out of 175) still considered the expenses as quite high or very high.

Within different stakeholder groups, 27% (21 out of 78) of **public authorities** rated the costs as quite low compared to the benefits, whilst 13% (10) thought these costs were quite high and 8% (6) very high.

Among **academic/research institutions**, 26% (14 out of 54) thought the costs were quite high; 22% (12) rated them as quite low and 39% (21) did not know how to assess these costs.

All **business association** representatives (2) indicated that they did not know how to assess these costs. The majority of **companies** (63%, 5 out of 8) considered the costs to be quite low while the remaining 38% (3) did not know.

Most of **NGOs** rated the costs as either quite low (64%, 5 out of 8) or very low (13%, 1) and the remaining 25% (2) thought the question was not applicable to them.

Half of **trade union** representatives (3 out of 6) indicated the costs incurred were quite low compared to the benefits. The same percentage of respondents (17%, 1) selected 'don't know' or not 'applicable'. 17% (1) considered the costs to be very low.

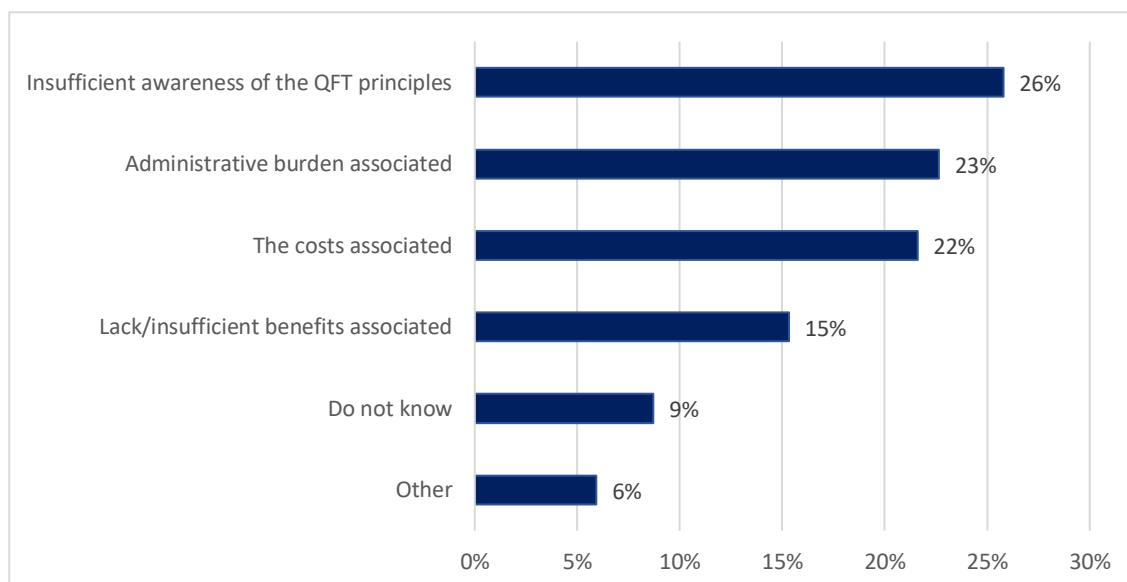
When prompted whether they would consider or continue to offer traineeships if these were paid/remunerated, the majority of organisations (59%, 103 out of 175) gave a positive response. While 22% (39 out of 175) thought it was not applicable for their situation and 15% (27 out of 175) did not know, only 3% (6 out of 175) reported that they would not offer traineeships if these were paid/remunerated. A further analysis of the organisations which thought this question was not applicable to them indicated that 20 were public authorities, 7 other type of organisation, 7 academic/research institutions, 2 trade unions, 2 business associations and 1 NGO.

Across all groups of stakeholders, the majority of respondents indicated that they would offer traineeships if these were paid with the exception of VET/Higher Education institutions (33%, 1 respondent out of 3) who disagreed with the statement.

The public consultation further asked organisations what are the main obstacle preventing employers from offering quality traineeships compliant with the QFT. A total of 180 responses were received. The question allowed for multiple answers. Among the types of organisations which responded, there were 54 academic/research institutions, 19 other type of organisations, 8 companies, 8 NGOs, 6 trade unions and 2 business associations.

As figure 8 shows, 26% (74 out of 287) of the responses to the consultation indicated that insufficient awareness of the QFT principles is the main obstacle preventing employers from offering quality traineeships which are compliant with the QFT. As such, other challenges encountered by organisations were: the administrative burden associated with the traineeship implementation (23%, 65 out of 287), costs incurred by employers (22%, 62 out of 287) and a lack or insufficient benefits visible (15%, 44 out of 287). Only 9% (25 out of 287) respondents did not know any obstacles and 6% (17 out of 287) reported other challenges such as lack of financial resources (4), employer willingness to offer quality traineeships (4), obligation to hire trainee after traineeship (3) and lack of sufficient incentives (1).

Figure 10. Main obstacles preventing employers from offering quality traineeships compliant with the QFT (multiple choices allowed)



Source=QFT Public consultation 2022, N=180

When asked how the QFT has helped employers to offer quality traineeships, 23% (61 out of 270³) of respondents indicated that the framework directed more EU/national funds towards traineeships and 21% (57

³ Multiple answers were allowed for this question.

out of 270) thought it raised awareness of the principles of quality traineeships. Similarly, 21% also considered the QFT supported employers by providing more practical guidance on the principles of quality traineeships. A smaller percentage (16%, 42 out of 270) regarded the QFT implementation as facilitating the establishment of national legislation or national quality frameworks for quality traineeships. Around 17% (47 out of 270) were not aware of how the QFT helped employers.

Among **public authorities**, 28% (34 out of 122) responses highlighted that the framework supported by directing more EU / national funds towards traineeships and 22% (27 out of 122) considered that it provided more practical guidance on the principles of quality traineeships.

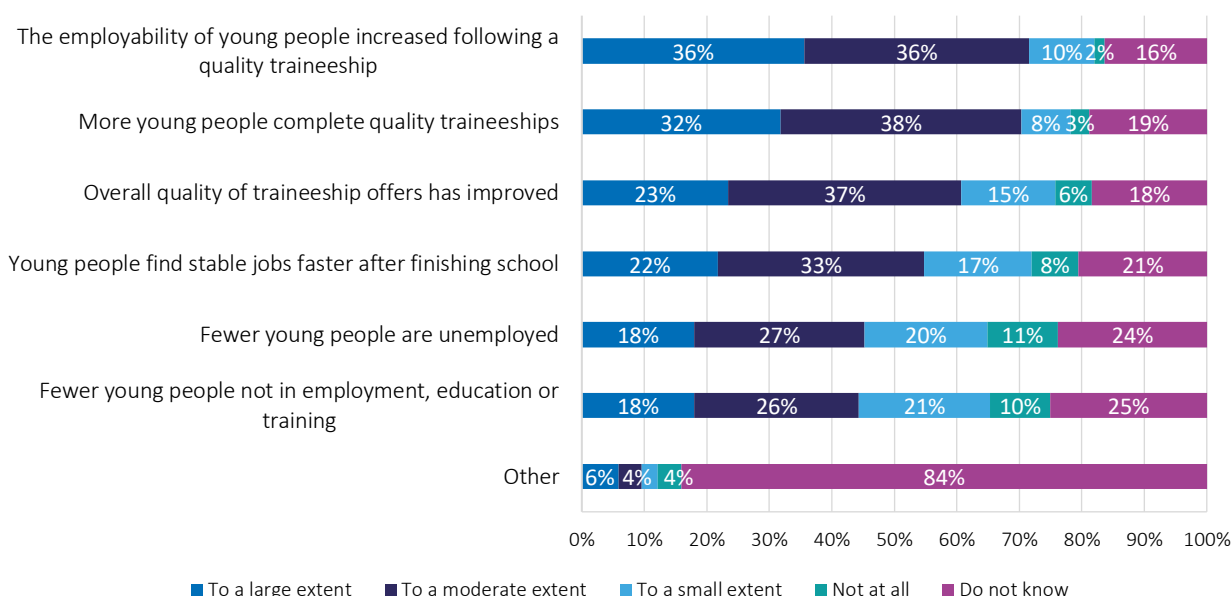
Most responses within the group of **academic/research institutions** considered that the QFT supported employers by providing more practical guidance (21%, 18 out of 85) and 22% reported that it facilitated the establishment of national legislation on / national quality framework.

Around 31% (4 out of 13) of responses among respondents representing companies/business organisations thought that the QFT raised awareness of the principles of quality traineeships and 23% (3 out of 13) that it provided more practical guidance on the principles of quality traineeships.

Finally, among trade union representatives 36% of responses (4 out of 11) considered that the QFT helped by directing more EU / national funds towards supporting traineeships and 18% (2 out of 11) indicated that it contributed to each of the following: raising awareness of the principles of quality traineeships, providing more practical guidance and facilitating the establishment of national legislation on / national quality frameworks for quality traineeships.

When asked to assess the extent to which the QFT contributed to the benefits across the Member States and the EU, a total of 239 responses were received.

Figure 11. In your opinion, to what extent has the QFT contributed to the following benefits in your country/the EU?



Source=QFT Public consultation 2022, N=239

72% (171 out of the 239 respondents that answered this question) considered to a large or moderate extent that the QFT increased the employability of young people following a quality traineeship and 70% (168 out of 239) thought to a large or moderate extent that more young people are completing quality traineeships. In contrast, 31% (74 out of 239) rated that the QFT contributed to a small extent or not at all to fewer young people being unemployed, and 31% (73 out of 239) thought to a small extent or not at all that fewer young people are not in employment, education or training, as illustrated by figure 9 below.

Among **public authorities**, respondents most frequently indicated that the employability of young people increased following a quality traineeship (42%, 35 out of 85) to a large extent and to a moderate extent (48%,

41). Seven out of 85 public authorities (8%) did not consider the QFT led to fewer young people not in employment, education or training.

Almost half of the **academic/research institutions** considered that the employability of young people increased following a quality traineeship (38%, 21 out of 56). Fewer young people being unemployed was the statement most selected as the impact for which the QFT had not contributed at all (7%, 4 out of 56).

Two out of three **business associations** (67%) considered that the framework supported to a moderate extent to increasing the employability of young people and helping young people finding stable jobs. Half of the **companies** (4 out of 8) considered that the QFT led to more young people completing quality traineeships to a large extent, whilst (3%, 2 out of 8) indicated that it did not contribute at all to having fewer young people not in employment, education or training or being unemployed.

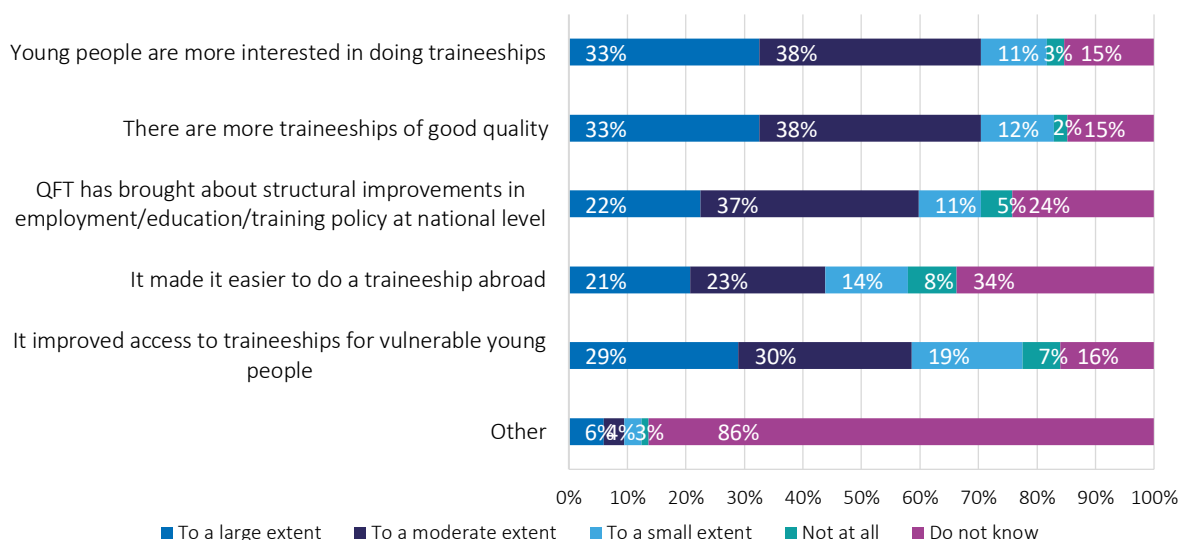
Half of the trade union representatives (3 out of 6) reported that the QFT implementation supported the employability of young people to a large extent. However, the same percentage indicated that the framework did not contribute at all to: young people finding stable jobs faster after finishing school, fewer young people being not in employment, education or training and fewer young people being unemployed.

3.4. What is the added value of the QFT?

Respondents taking part in the consultation on behalf of an organisation were then asked the following question: “To what extent has implementation of the EU-level QFT produced added value compared to what could have been achieved if your country had acted alone?”. A total of 169 responses were received. Individual respondents were not addressed this final question.

As shown in figure 10, most respondents stated that the implementation of the QFT produced added value to a large extent in the following dimensions: “There are more traineeships of good quality” (33% of respondents, 55 out of 169) and “Young people are more interested in doing traineeships” (idem). Conversely, implementation of the QFT was mostly found to not have produced added value in terms of the easiness of doing traineeships abroad (8% of respondents, 14 out of 169).

Figure 12. To what extent has implementation of the EU-level QFT produced added value compared to what could have been achieved if your country had acted alone?



Source=QFT Public consultation 2022, N=169

Among **public authorities**, almost half of respondents (41 out of 85, 48%) considered that the QFT increased the number of traineeships of good quality to a moderate extent and 36% thought it contributed to a moderate extent to this aspect. Nine respondents (11%) reported that the framework did not ease at all doing a traineeship abroad.

Academic/research institutions were more likely to indicate that the added value of the QFT was encouraging young people to be more interested in doing traineeships (25 out of 56, 45%). The respondents

within this group also considered that the QFT only improved access to traineeships for vulnerable groups to a small extent (12, 21%) or not at all (2, 4%).

There were mixed views among **business associations**. One in three respondents (33%) indicated that the QFT contributed to all listed statements to a moderate extent. However, the same number of respondents also concluded that the framework did not bring added value at all. Four in eight **companies/business organisations** (50%) reported that the QFT made it easier to do a traineeship abroad to a large extent. The same percentage (50%) reported that the QFT contributed to a moderate extent to: bringing about structural improvements in employment/education/training policy and increasing the interest of young people in doing traineeships. Two out of five enterprises offering traineeships (40%) state that the QFT brought added value to the number of good quality traineeships to a moderate extent, and two out of five (40%) thought the added value was brought to a large extent. One enterprise out of five (20%) found the added value to be produced to a small extent. Concerning young people's interest in doing traineeships, all enterprises found the QFT to bring added value either to a large extent (2 out of five, 40%) or to a moderate extent (3 out of 5, 60%).

Within the **non-governmental sector**, four out of 11 respondents (36%) indicated that the framework supported to a moderate extent the increase in number of good quality traineeships. Two respondents (18%) reported that the QFT did not bring added value in improving access to traineeships for vulnerable groups.

Three out of six (50%) trade union representatives reported that following the QFT implementation young people are to a moderate extent more interested in doing traineeships. Four (67%) indicated that the QFT contributed to a small extent to the supply of good quality traineeships whilst four out of six (67%) reported that the QFT had no added value in terms of bringing about structural improvements in employment/education/training policy and improving access to traineeships for vulnerable young people.

Finally, participants were asked if they had any further comments to share. The open-ended answers to this are summarised in Box 4.

Box 4: Analysis of open-ended answers asking if the respondents had further comments

Respondents' answers focused on ways that the QFT could be improved. Ensuring that EU standards are consistently applied across all Member States and sectors was considered essential (7 including 1 public authority, 1 academic/research institution, 1 trade union and 3 EU citizens) among respondents to the open-ended questions. Respondents highlighted the need to address unfair practices (7 including 5 EU citizens, 1 trade union and 1 company) by monitoring traineeship practices and setting reporting procedures for trainees. Proper remuneration (7, including 5 EU citizens, 1 trade union and 1 other organisation) was considered a key aspect of high-quality traineeships, as well as ensuring traineeships qualify for labour protections (3, including 1 NGO and 2 EU citizens). The QFT could be further improved by tailoring policies to the specific needs of regions, sectors and the needs of vulnerable groups (5, including 2 public authorities, 2 academic/research institutions and 1 NGO) (e.g., trainees with disabilities). Finally, the analysis highlighted the need of raising awareness of the QFT and its principles in order to further enhance the quality of traineeships.

Annex 8: Results of the survey of trainees and potential trainees

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1.0 Introduction

1.1 Overarching approach

The internet-based survey was launched as part of Task 1 of the study supporting the evaluation of the Quality Framework for Traineeships (QFT), which aimed to undertake a set of interlinked targeted consultation activities to gather the views and opinions of a wide range of relevant stakeholders on the implementation of the QFT.

The survey focused on two key target audiences covering the EU-27:

1. **Individuals who have traineeship experience, including current trainees** (i.e., young people aged between 15 and 29 years old who are currently doing traineeships within the Member States); and former trainees (i.e., individuals who have completed a traineeship between 2014 and the launch of the survey). This supported the Research Team in identifying trends and developments over time.
2. **Young people aged 15-29 who have not had any direct traineeship experience but might be interested in doing a traineeship in the future.** The goal of reaching this target group was to learn how traineeships are viewed by potential future trainees, as well as those who have decided not to participate in a traineeship, investigating the reasons behind this choice.

1.1.1 Methodology

Once the final data was received, some limited data cleaning of the results was necessary. The analysis of results was carried out using both quantitative (to analyse the frequencies of the closed answers) and qualitative methods (for the open questions, to analyse complex concepts as well as to substantiate and interpret the quantitative data with relevant insights). In addition, the Research Team categorised the responses across a range of relevant segments (including country where the traineeship was conducted, age range, gender, educational attainment, country of origin, and sector of the traineeship).

1.1.2 Sample composition

The survey received a total of 3,814 responses, out of which 3,787 answers were from EU member states.

Breakdown of survey respondents

Using a robust screening process, the Research Team assessed the number of responses received from the main target group, more specifically respondents residing in the EU member states, aged 18 or older, with voluntary traineeship experience from 2014 onwards. Respondents with only mandatory traineeship experience (e.g., in fields such as law or medicine) were excluded from the core target group. Likewise, those with traineeship experience in the EU institutions were also excluded from the target group in order to remove any potential bias while conducting the analysis. Following this process, the total number of responses received from the core target group was **1,836**.

The remaining responses do not belong to the core target demographic, but they have been used to provide additional context to the study.

The audience breakdown is provided below:

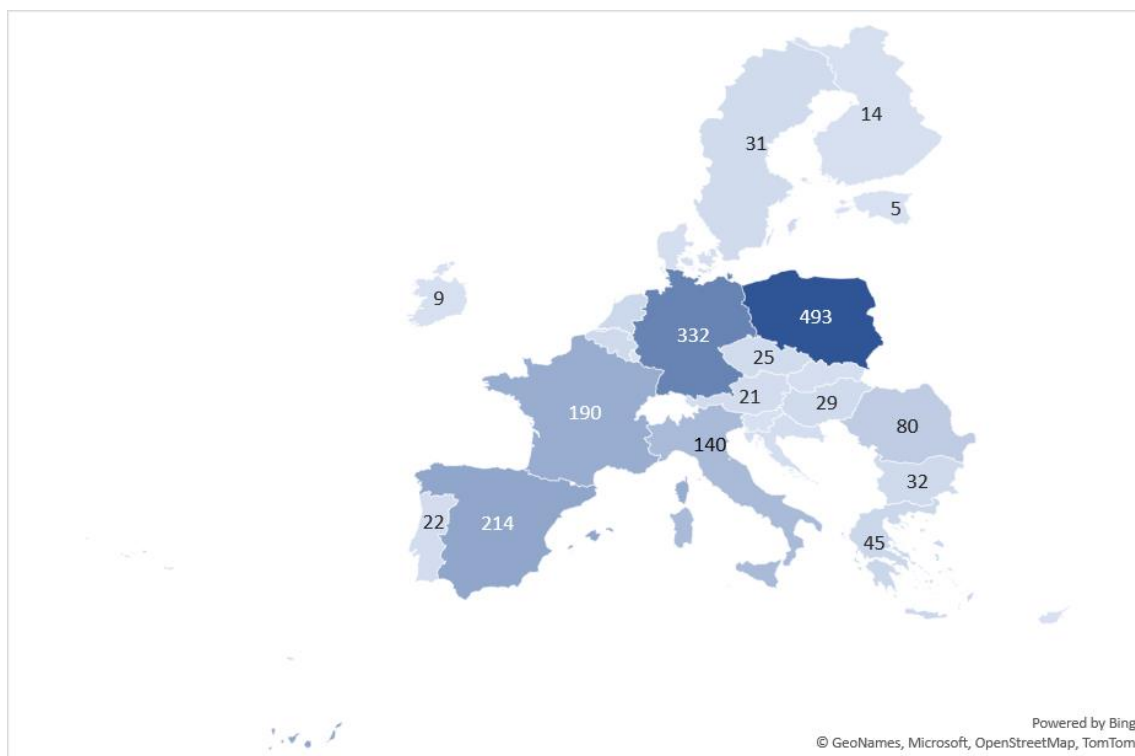
Table 1. Breakdown of survey respondents

Category	Number of respondents	Share
Total respondents	3,814	100%
Within the core target group	1,836	48.1%
People with no traineeship experience	702	18.4%
Respondents with only mandatory traineeship experience	962	25.2%
People with traineeship experience before 2014	65	1.7%
Respondents with traineeship experience from non-EU countries	75	2.0%
Respondents with traineeship experience in multiple EU countries	84	2.2%
People with traineeship experience in the EU institutions	90	2.4%

Source: QFT online survey, Ecorys, 2022

Geographical distribution

The results of the survey show large differences between the EU countries covered by the survey. When asked to indicate their country of origin, the largest number of respondents out of 1,912 selected Poland (493), Germany (332), Spain (214), France (190) and Italy (140). Less than 10 respondents chose Cyprus (9), Ireland (9), Slovenia (9), Estonia (5) and Luxembourg (2) as their country of origin.

Figure 1. Geographic distribution of responses

Source: QFT online survey, Ecorys, 2022, N=1,912

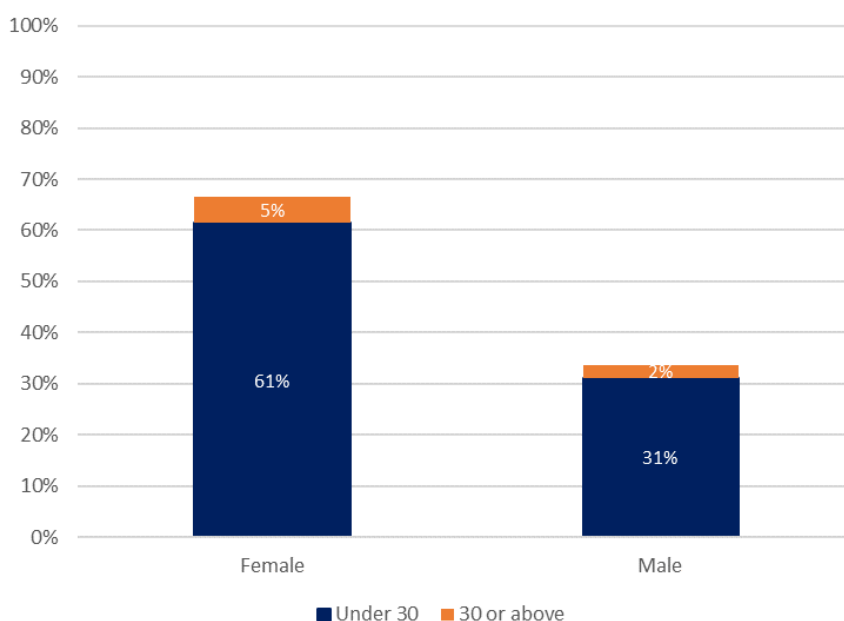
Similarly, the vast majority of participants (72%) also selected Poland (474), Germany (290), Spain (238), France (202) and Italy (164) when prompted to indicate the country in which they undertook their most

recent traineeship. Furthermore, a relatively small number of respondents indicated that their most recent traineeship was in Slovakia (10), Cyprus (10), Luxembourg (9), Slovenia (5), Lithuania (1), Estonia (1) and Malta (1). No participant surveyed conducted their most recent traineeship in Latvia. However, 76 respondents indicated that their traineeship was undertaken in multiple EU countries.

Demographic characteristics of respondents

The **largest share of respondents in the sample were females (66%)**, whilst 33% were male and 1% preferred not to disclose their gender. Among the 1,912 respondents, 93% were aged under 30 and 7% indicated they were 30 or above, as illustrated by Figure 2 below.

Figure 2. Gender and age classification of respondents



Source: QFT online survey, Ecorys, 2022, N=1,912

More specifically, 53% out of 1,912 respondents were aged 18-24, 39% were aged between 25 and 29 years old and 7% were above 30.

When analysing the additional information provided by the respondents, 4% of respondents indicated that they had a disability whilst 95% responded negatively. The gender distribution among people with disabilities in the sample was relatively equal.

In terms of the status of respondents at the time of doing the traineeship, 41% responded that they were a full-time student, 18% were unemployed, 14% were employed, 12% of respondents were part-time students and 11% were looking for a job. Only 2% of participants indicated that they were self-employed and 3% selected 'Other' status.

2.0 Trainees background information

2.1 Number of traineeships completed

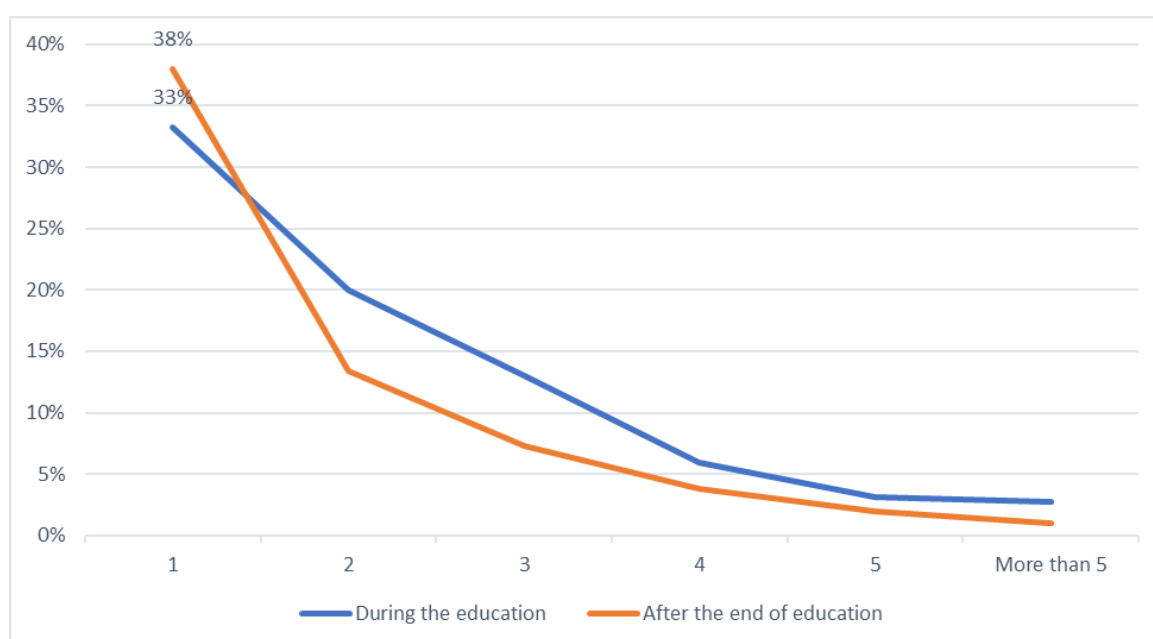
The respondents were asked to provide the total number of traineeships done during and after completing their education. As can be seen in the figure below, around 33% of respondents indicated that they

undertook one traineeship during their education, 20% conducted two traineeships whilst only 3% did more than five traineeships during their education. Around 22% of respondents had not completed any traineeship during their education.

Looking at the proportion of respondents who undertook a traineeship after the end of their education, **more than a third (38%) reported doing one traineeship** while the percentage of those who did 2 or more traineeships decreases to below 20%. Only a small percentage of surveyed respondents (2%) did more than 5 traineeships. Furthermore, 35% of trainees reported not doing a traineeship after completing their education.

The majority of respondents (68% out of 1,912) indicated that none of their traineeships were, at least, partly abroad. However, **19% of respondents reported doing one traineeship abroad** whilst the percentage of people who indicated doing two traineeships decreased to 7% and those doing three or more traineeships to less than 3%.

Figure 3. Total number of traineeships done during and after completing the education



Source: QFT online survey, Ecorys, 2022, N=1,912

The highest share of trainees completing one traineeship during their education was in the tertiary education level (36%), whilst the highest percentage of trainees completing a traineeship at the end of their education or training was reported in vocational (secondary level) education (41%). Similarly, 21% of respondents in the tertiary education level reported completing two traineeships during their education compared to 23% of vocational (tertiary level) trainees who completed two traineeships at the end of their education or training. The respondents in the vocational education level (either secondary or tertiary) were more likely to report that they completed three or four traineeships either during or at the end of their education or training.

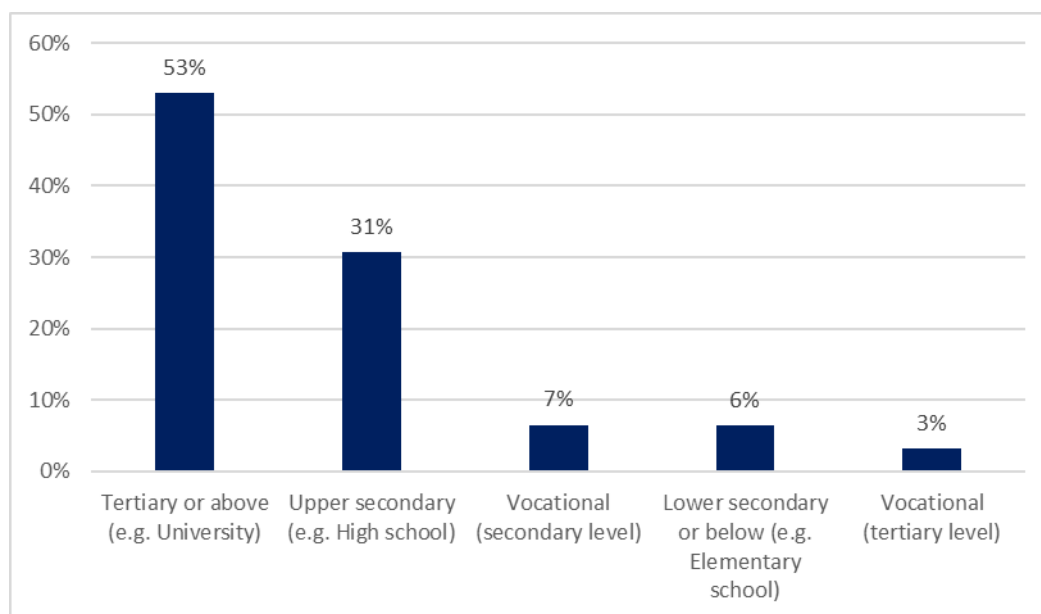
The countries where the majority of respondents reported doing one traineeship were Malta (100%), Estonia (100%), Slovakia (60%), Greece (52%), Belgium (51%) and Hungary (50%). The country with the highest share of trainees completing two traineeships during their education was Denmark (33%) followed by Austria (20%), whilst all respondents in Lithuania (100%) and 40% of those in Slovenia reported doing three traineeships during their education. Around 20% of trainees in Cyprus and 11% of those in Luxembourg indicated that they completed more than five traineeships during their education. In comparison, most respondents in Poland (54%) and Croatia (50%) did not complete any traineeships during their education.

At the end of their education, professional training or studies, the majority of trainees in Slovenia (80%), Luxembourg (67%), Croatia (55%) and Poland (52%) reported completing one traineeship. The highest percentage of respondents completing two traineeship was reported in Bulgaria (22%). Furthermore, around 10% of respondents in Slovakia indicated that they completed five traineeships, whilst 12% of those in Hungary undertook more than five traineeships at the end of their education or training. The vast majority of trainees in Estonia (100%), Lithuania (100%), Malta (100%), Slovakia (60%) and Greece (60%) reported not completing any traineeship at the end of their education or training.

2.2 Qualification and educational level of trainees

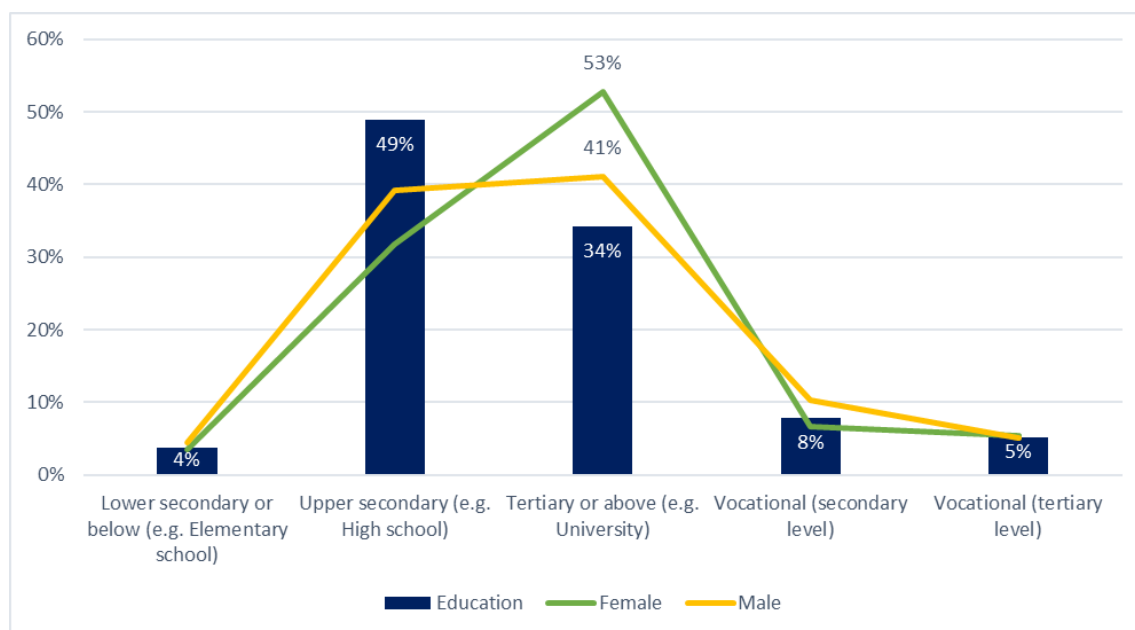
At the time of conducting the traineeship, **more than half of respondents had achieved a tertiary or higher education level** and 31% had an upper secondary degree, as shown by Figure 4. In comparison, less than 10% of participants had obtained a vocational secondary level (7%), lower secondary education level (6%) and vocational tertiary level degree (3%).

Figure 4. Level of education at the time of the traineeship



Source: QFT online survey, Ecorys, 2022, N=1,912

When analysing the highest level of qualification obtained by the respondents, it can be noted that there are a **number of differences between male and female trainees**. Figure 5 illustrates that while the gender distribution is even at the lower secondary or below (4%) and vocational tertiary level (5%), there are more female respondents with a tertiary or higher education degree (53%) compared to 41% of male participants. At the same time, the proportion of male trainees reporting the upper secondary education and vocational secondary level as their highest qualification obtained is higher (i.e., 39% vs 32%; and 10% vs 7% respectively).

Figure 5. Highest level of qualification obtained

Source: QFT online survey, Ecorys, 2022, N=1,912

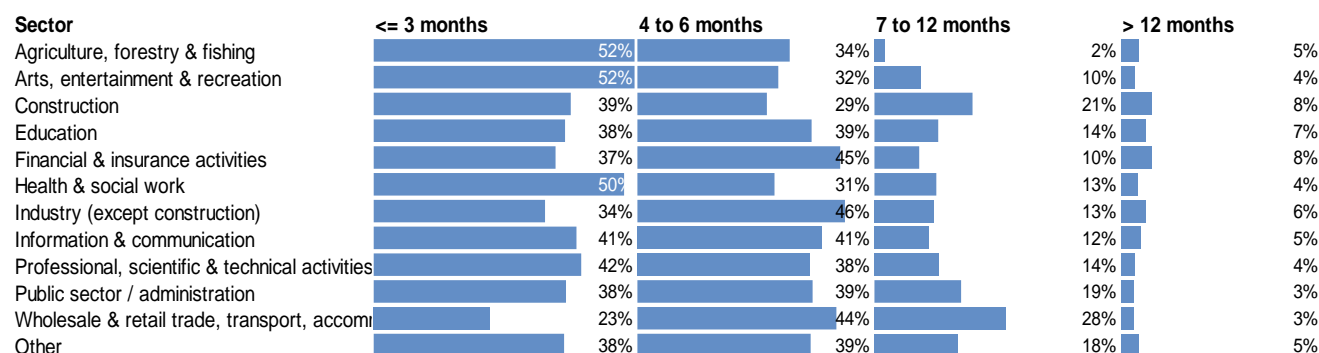
A further analysis by the **type of sector** in which trainees completing their traineeship highlighted that almost half of respondents within the agriculture, forestry and fishing sector (48%), construction (46%) and wholesale and retail trade, transport, accommodation and food had obtained an upper secondary education degree. In comparison, the majority of trainees within the professional, scientific and technical activities (64%), information and communication sector (59%), public sector and administration (56%), art, entertainment and recreation (53%) and health and social work (50%) had a tertiary or above education. The highest percentage of trainees with a vocational (secondary level) degree was in the agriculture, forestry and fishing sector (16%) while the largest share of respondents with a vocational (tertiary level) degree was in the wholesale and retail trade, transport, accommodation and food industry (10%). Less than 10% of trainees across all sectors had obtained a lower secondary or below degree as their highest qualification.

2.3 Duration of traineeship

The **largest share of respondents indicated that their traineeship lasted between 4 and 6 months (39%)** followed by 38% of participants whose traineeship lasts less or exactly 3 months (38%). Around 17% responded that it lasted between 7 and 12 months and only a small share (5%) conducted their traineeship for more than 12 months. The analyst showed no large differences in terms of the duration of the traineeship by gender.

In the majority of countries, the traineeship lasted either less or equal to 3 months or between 4 and 6 months. However, 45% of respondents in Croatia responded that their traineeship lasted between 7 and 12 months, and 40% of Slovenian respondents reported that it lasted for more than 12 months.

Trainees were more likely to report that the duration of their traineeship was below or equal to 3 months within the agriculture, forestry and fishing (52%), arts, entertainment and recreation (52%) and the health and social work sector (50%). Moreover, almost half of respondents in the industry (except construction) (46%) and financial and insurance activities (45%) indicated that their traineeship was between 4 and 6 months, while the trainees in the public sector and administration were more likely to report that their traineeship was between 7 and 12 months. The highest percentage of trainees whose traineeship was more than 12 months were from the construction (8%) and financial and insurance sectors (8%).

Figure 6. Differences in traineeship duration at sectoral level

Source: QFT online survey, Ecorys, 2022, N=1,912

2.4 Profile of traineeship providers: sector, type, and size

When asked to indicate the type of traineeship provider, half of respondents (50%) reported doing their traineeship in a private company/organisation, whilst 43% selected a public company/organisation. A few (7%) did not know the type of provider.

In terms of the size of the traineeship provider, **half of the respondents (50%) did their traineeship in a medium size company/organisation** (10 to 250 employees), 24% in a small company/organisation and only 17% conducted their traineeship in a large company of more than 250 employees.

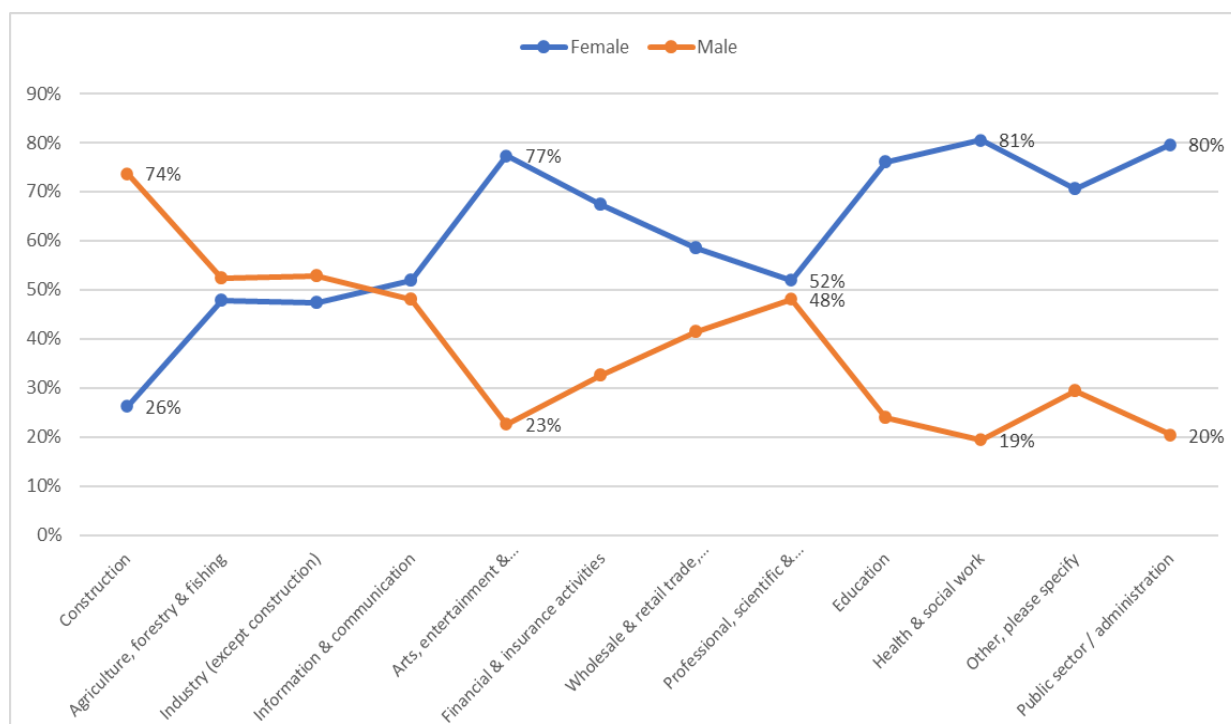
Undertaking a traineeship in the public sector was the most common response, with 20% of trainees selecting this response (Figure 7). A smaller share of respondents completed their traineeship in the health and social work (10%), professional, scientific, and technical activities (10%) and education (9%). Less than 5% of traineeship providers were in the construction (4%) and the agriculture, forestry & fishing sector (2%).

Figure 7. Sectors of traineeship providers

Source: QFT online survey, Ecorys, 2022, N=1,912

The analysis of gender distribution of trainees within the various sectors reveals **large differences in terms of the traineeship choices made by female and male respondents**. Female trainees were more likely to indicate that they completed a traineeship in health and social work (81% vs 19%), public sector and administration (80% vs 20%), arts, entertainment and recreation (77% vs 23%), and education (76% vs 24%). In contrast, the traineeships in the constructions sector were predominantly undertaken by male respondents (74 vs 26%). As Figure 8 illustrates, in industries such as professional, scientific, and technical activities (52% female; 48% male), information and communication (52% female; 48% male) and agriculture, forestry and fishing (48% female; 52% male) the gender differences are less noticeable.

Figure 8. Sector of traineeship by gender



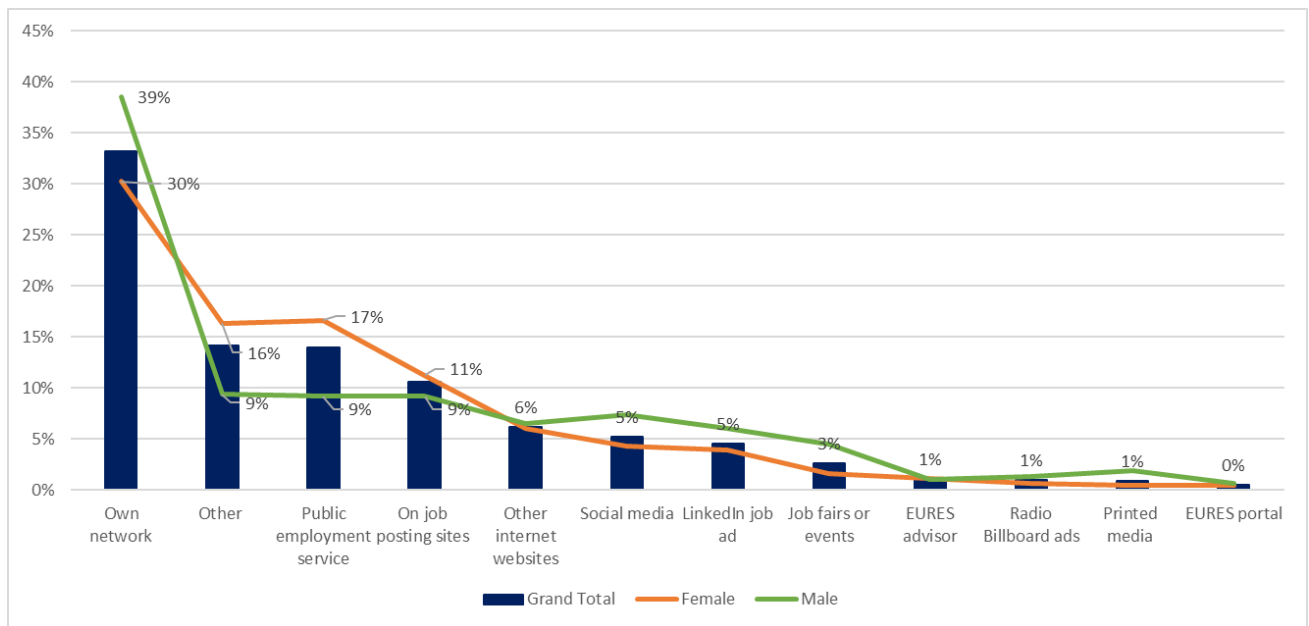
Source: QFT online survey, Ecorys, 2022, N=1,912

3.0 Traineeship opportunities

3.1 Key channels used to find traineeship opportunities

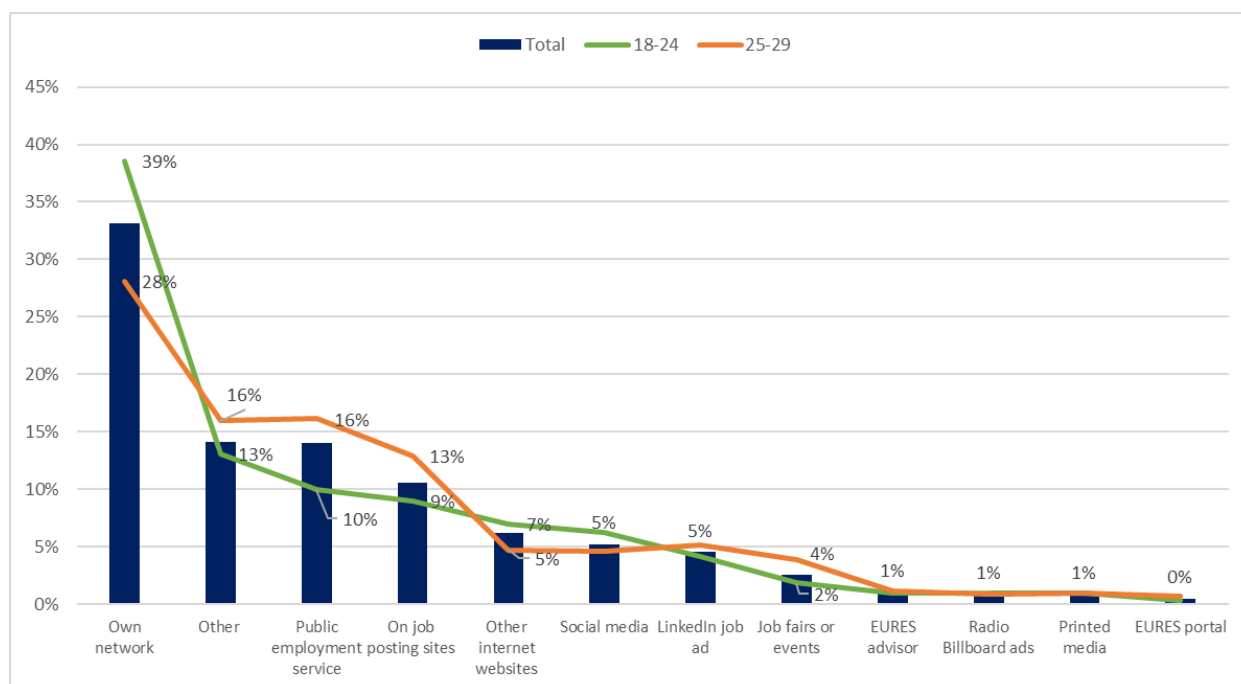
The **largest share of respondents (33%) reported finding a traineeship opportunity using their own network**, including friends, acquaintances or family members. The percentage was higher among male respondents (39%), whilst 30% of women indicated that they used their own network to find a traineeship, as shown by Figure 9. Female respondents were also more likely to use job posting sites (11%) and the public employment service (17%) to find traineeship opportunities in comparison to 9% of male respondents.

Other internet websites, social media or LinkedIn were each used by less than 7% of survey respondents. The least used channels to find traineeships were the EURES portal. Less than 1% of respondents selected this option.

Figure 9. Channels used to find traineeships by gender

Source: QFT online survey, Ecorys, 2022, N=1836

The analysis also showed certain variations between different age groups. Among the 18-24 and 25-29 age groups, the most prevalent channel used to find traineeships was their own networks (39% and 28% respectively) as shown in Figure 10. Respondents aged below 18 years old reported using their own network or other channels the most (25%) when looking for traineeship opportunities and those aged above 30 years old used the public employment service the most (32%) followed by their own networks (22%). In comparison, a smaller share of respondents between 25-29 years old (16%), 10% of 18-24 years olds and no respondent below 18 years old indicated that they found their traineeship through the public employment service. LinkedIn job ads (13%) and other internet websites (13%) were also more prevalently used among the respondents aged below 18 years old compared to other age groups. **EURES portal was the least used channel for finding traineeship** with 1% of respondents aged 25-29 and 1% of those above 30 years old finding a traineeship opportunity this way.

Figure 10. Channels used to find traineeships by age group

Source: QFT online survey, Ecorys, 2022, N=1,836

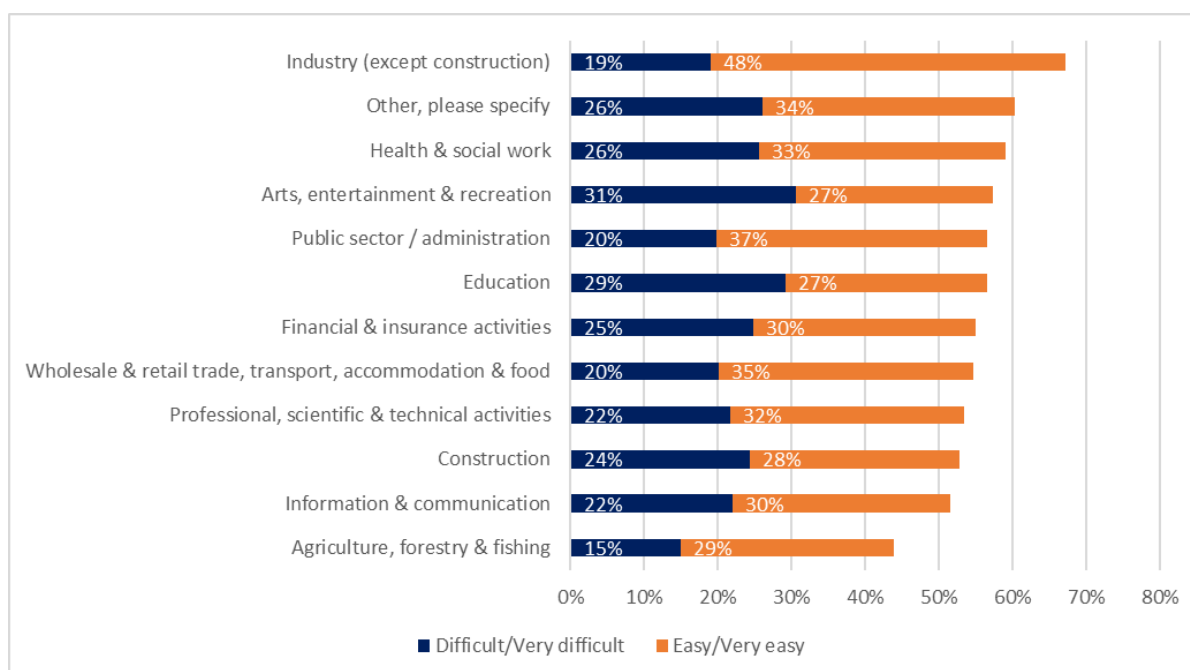
Across all sectors, most respondents reported that they found their traineeship opportunities through their network of friends, acquaintances or family members, with one exception. **42% of those who conducted a traineeship in the public sector/ administration used the public employment service** to find this opportunity. Using their own network was the most used channel in the agriculture, forestry & fishing sector with 68% of respondents selecting this option. Other channels used to find a traineeship were: job posting sites such as Indeed and Glassdoor in the Financial and Insurance sector (17%) as well as other industries except construction (17%). Social media was the second most used channel in the construction sector (11%).

Using one's network to find a traineeship opportunity continued to be the most common method used across most of the EU countries. Using the Public Employment Service was, however, more popular among respondents from Estonia (100%), Poland (41%) and Slovenia (40%). The highest percentage of respondents finding a traineeship via social media was in Slovenia (20%), whilst using on job posting sites was a more popular method among the respondents from Finland (21%) and Belgium (20%). Attending job fairs or events was mostly used in Cyprus by 29% of survey respondents to find a traineeship compared to other countries and 22% of participants in Luxembourg preferred other internet websites to find a traineeship opportunity.

3.2 Ease of finding traineeships

Survey respondents were then asked to assess how easy or difficult it was for them to find their traineeship opportunity. Overall, 40% of respondents indicated that it was neither difficult nor easy for them to find the traineeship, whilst 33% reported that they found this process very easy or easy and 24% found it very hard or hard. Women were more likely to indicate that they found this process neither difficult nor easy (23% vs 16%). A very small share (4%) selected 'Don't know'.

An analysis across all sectors reveals that finding a traineeship was considered very easy/easy in the industrial (48%), public (37%) and the wholesale & retail (37%) sectors. In comparison, **31% of respondents in the arts, entertainment and recreation business and 29% of those undertaking a traineeship in education found this process difficult/very difficult.**

Figure 11. Ease of finding a traineeship across all sectors

Source: QFT online survey, Ecorys, 2022, N=1,836

In most countries, finding a traineeship opportunity was considered neither easy nor difficult. The process was considered very easy/easy by respondents from the following countries:

- Lithuania (100%)
- Malta (100%)
- Bulgaria (50%)
- Germany (48%)
- Finland (47%)
- Czechia (47%)

In comparison, the largest percentage of respondents who reported finding a traineeship difficult or very difficult was in Cyprus (60%), Spain (38%) and Greece (36%).

3.3 Usage of EURES Portal

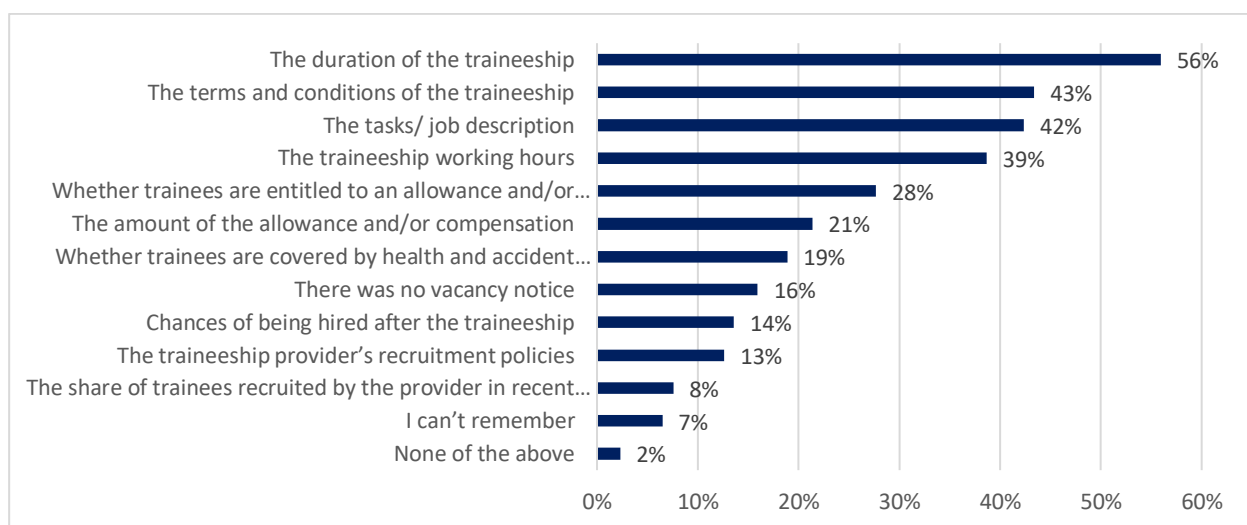
The **EURES portal was used by 13% of survey respondents to find a cross-border traineeship opportunity**. A higher share of respondents who found their traineeship via the EURES portal conducted their traineeship in financial and insurance activities (27%), the construction sector (26%) and agriculture (17%). In terms of the countries where EURES portal was used to find traineeships, Romania (33%), Greece (33%), Austria (25%), Cyprus (25%), Poland (22%) and Bulgaria (20%) scored the highest percentages.

4.0 Traineeship vacancy notice

4.1 Vacancy notice elements

The duration of the traineeship was most frequently selected by respondents (56%) as the element that most clearly mentioned in the vacancy notice advertising the traineeship. This was followed by the terms and conditions of the traineeship (43%), the task/job description (42%) and the working hours (39%) which were all selected by more than a third of respondents. A smaller percentage of respondents (8%) reported that the share of trainees recruited by the provider recent years had also been mentioned in the vacancy notice whilst 7% did not remember the elements included and 2% indicated that none of the listed elements had been clearly mentioned in their traineeship vacancy notice.

Figure 12. Which of the following were clearly mentioned in the vacancy notice? (multiple choice allowed)

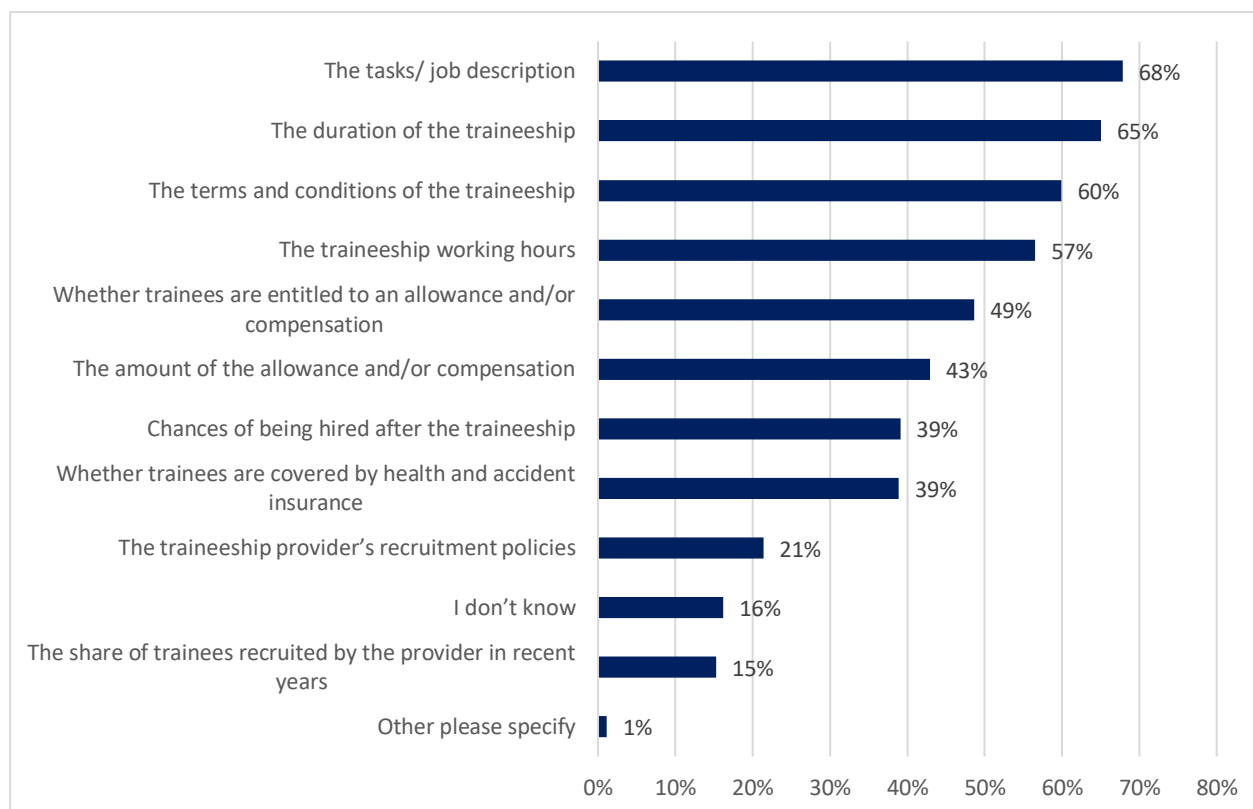


Source: QFT online survey, Ecorys, 2022, N=1836

4.2 Elements that should be mentioned in a vacancy notice

When asked which elements they would like to find in a vacancy notice advertising a traineeship, 68% of respondents selected the tasks/job description, followed by the duration of the traineeship (65%), the terms and conditions (60%) and the traineeship working hours (57%). Less than a quarter of respondents reported that they would like to see the traineeship provider's recruitment policies (21%) and the share of trainees recruited in recent years (15%).

Figure 13. Which of the following elements would you like to find in a vacancy notice advertising the traineeship? (multiple choice allowed)



Source: QFT online survey, Ecorys, 2022, N=449

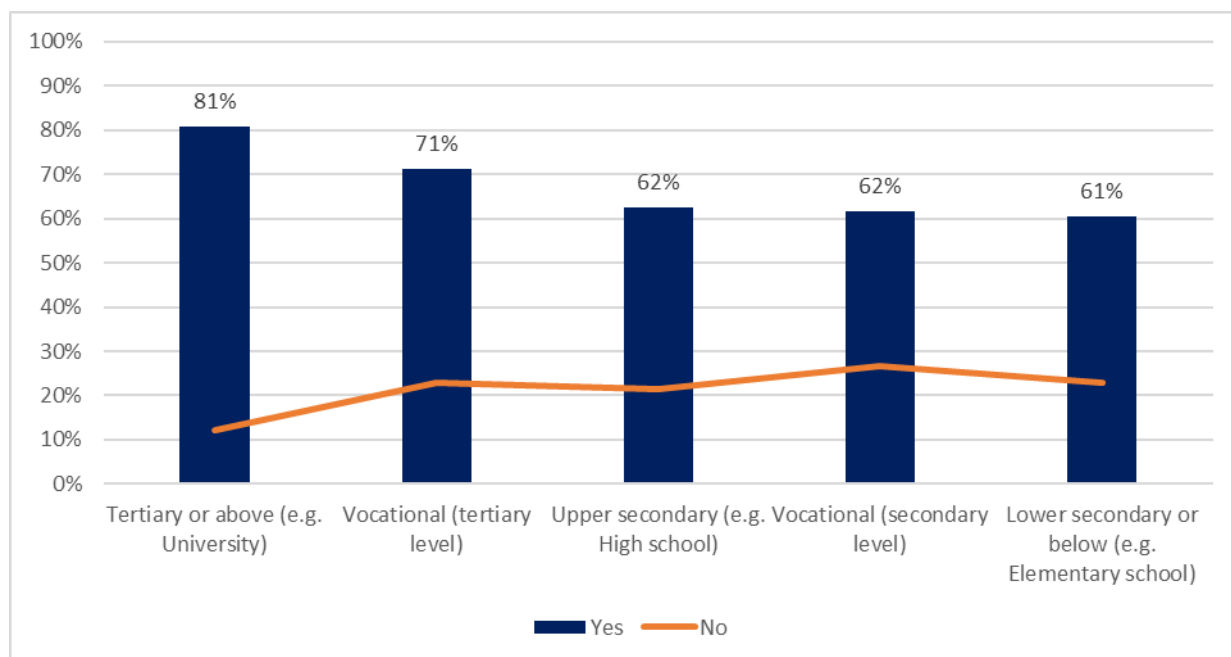
5.0 Written traineeship agreement

The written traineeship agreement is a key principle of the QFT. The agreement should indicate the educational objectives, adequate working conditions, rights and obligations of all parties and a reasonable duration for the traineeship. This section analyses the extent to which the target audience participating in this survey had a written agreement at the beginning of their traineeship, the elements mentioned in the agreement, useful information received as well as the details missing from the agreement.

5.1 Agreement at the beginning of the traineeship

The **majority of survey respondents within the core target group (72%) reported that they had a written agreement at the beginning of their traineeship**. Only a small share (17%) indicated that they did not sign such an agreement and 11% selected 'Don't know/ Can't remember'. Furthermore, when it comes to signing the traineeship agreement, the difference between male and female respondents is minor – 73% for female and 70% for male.

When looking at the education level at the time of the traineeship, 8 in 10 respondents from the tertiary or higher level and 1 in 7 from the vocational (tertiary level) education had a written agreement. **The percentage of respondents signing a traineeship agreement goes up with the level of education** as 62% in upper secondary and vocational education (at secondary level) had signed an agreement and 61% in lower secondary or below had done so.

Figure 14. Written traineeship agreement by education level

Source: QFT online survey, Ecorys, 2022, N=1,836

In terms of the sectors in which signing an agreement was more prevalent, 81% of respondents in the professional, scientific & technical activities and 80% of those working in the financial & insurance activities reported signing an agreement at the beginning of the traineeship. On the other hand, the largest share of respondents not signing an agreement were from the information & communication sector (24%), construction (21%) and agriculture, forestry & fishing (21%).

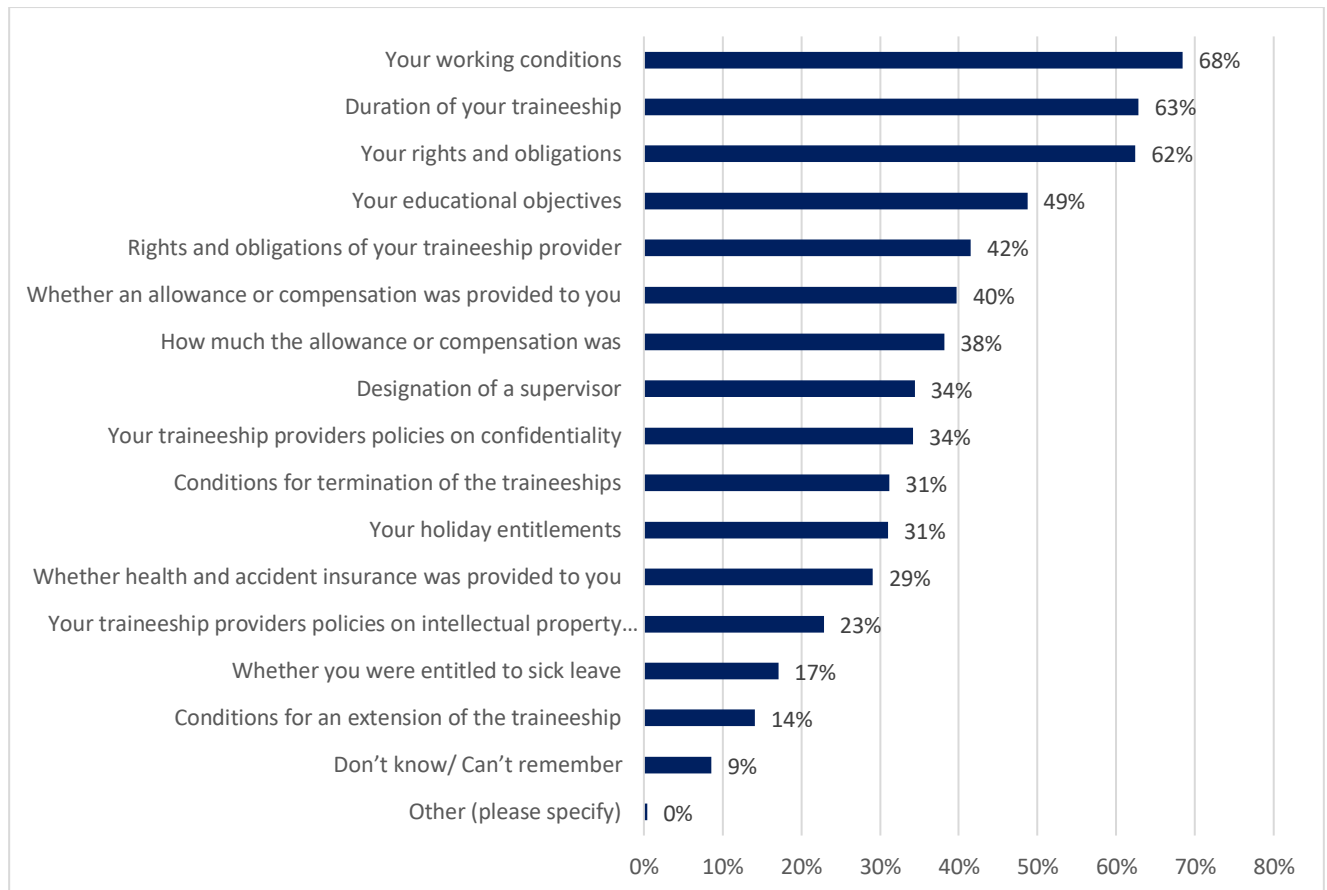
Across Europe, the highest percentage of respondents in Lithuania (100%), Estonia (100%), Cyprus (100%), Denmark (94%), Belgium (85%) and Croatia (82%) signed an agreement at the beginning of the traineeship, whilst Malta (100%), Ireland (44%), Slovenia (40%) and Hungary (35%) featured among the list of countries with the smallest number of respondents reporting that they have signed a traineeship agreement.

5.2 Elements mentioned in the written agreement

Respondents who reported that they signed a traineeship agreement at the beginning of their traineeship were then asked what elements were clearly mentioned in the written agreement. The most frequently selected element was the information regarding working conditions (68%), followed by the duration of the traineeship (63%) and the trainee's rights and obligations (62%).

The least mentioned was whether the trainee was entitled to sick leave (17%) and the conditions for an extension of the traineeship (14%). A small percentage of respondents (9%) did not know or could not remember the elements mentioned in their written agreement.

Figure 15. Which of the following elements were clearly mentioned in the written agreement? (multiple choice allowed)



Source: QFT online survey, Ecorys, 2022, N=1303

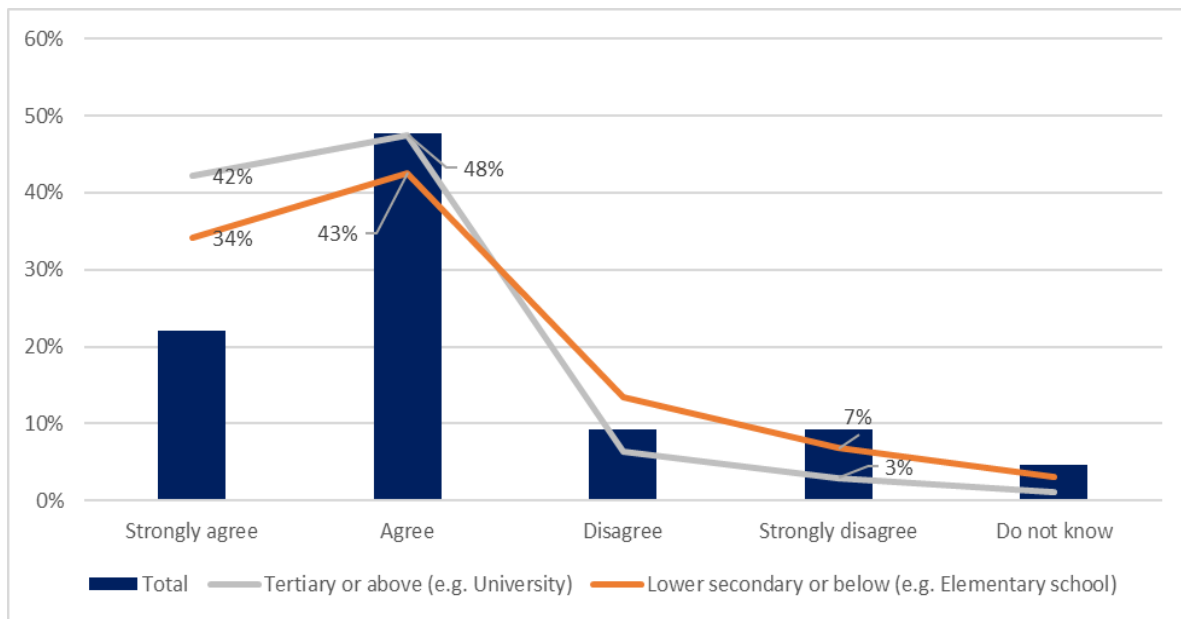
6.0 Traineeship learning and objectives

6.1 Involvement in defining the learning objectives

A **significant amount of the respondents, i.e., 70%, strongly agreed or agreed that they were involved in defining their learning objectives during the traineeship**. In comparison, 26% of the core audience either disagreed or strongly disagreed that they had any involvement in defining the learning objectives, whilst 5% did not know.

The analysis highlighted minor gender differences with 71% of male respondents indicating that they were involved in this process compared to 69% of females. Similarly, 27% of women either disagreed or strongly disagreed when asked if they were involved in defining their learning objectives compared to 24% of men. However, there is no indication that these differences are statistically significant.

Additionally, the analysis also emphasised some disparities in the number of responses by education level at the time of the traineeship. As Figure 16 illustrates, **respondents with a tertiary or higher education level were more likely to strongly agree/agree (42% & 43%) when asked if they were involved in defining the objectives of the traineeship** compared to those with lower secondary or below degree (34% & 43%). Furthermore, the second group was also more likely to disagree or strongly disagree with the statement.

Figure 16. Involvement in defining learning objectives by education level

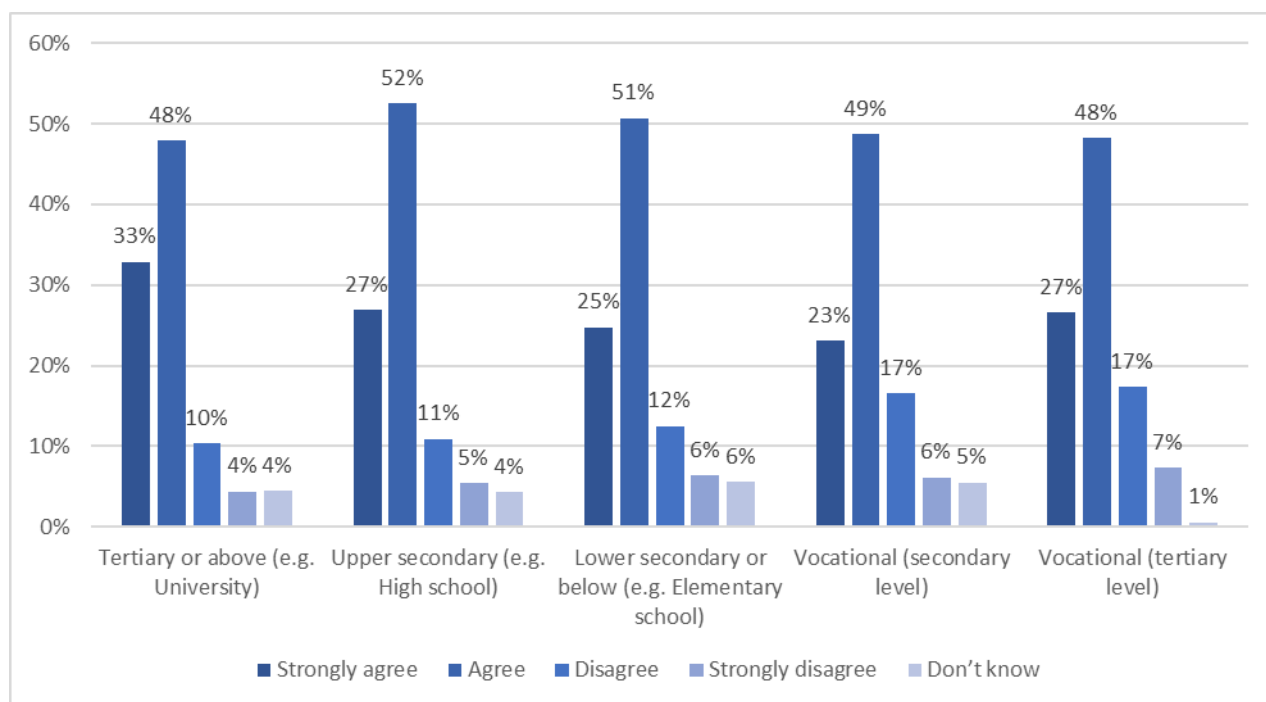
Source: QFT online survey, Ecorys, 2022, N=1836

6.2 Progress made on the pre-set educational objectives

When asked to assess the progress achieved on the educational objectives set for their traineeships, a **large majority of respondents (80%) either agreed or strongly agreed that they had made progress** in comparison with 16% of respondents who disagreed or strongly disagreed with the statement. Only a small share (4%) did not know if they made any progress.

Women were more likely to agree/strongly agree with the statement (50%) in comparison to male respondents (28%). However, as mentioned previously, the differences were not tested for statistical significance.

As seen previously, the respondents with tertiary education or above at the time of the traineeship (81%) and those graduated from upper secondary education (79%) were more likely to strongly agree / agree that they made progress on the pre-set educational objectives during their traineeship. In comparison, 75% of respondents in lower-secondary and vocational (tertiary level) and 72% of those with a vocational (secondary level) degree agreed or strongly agreed with the same statement. As illustrated by Figure 17, a quarter of participants with a vocational (tertiary level) degree disagreed or strongly disagreed that they made any progress on their educational objectives during the traineeship period.

Figure 17. Progress made by education level

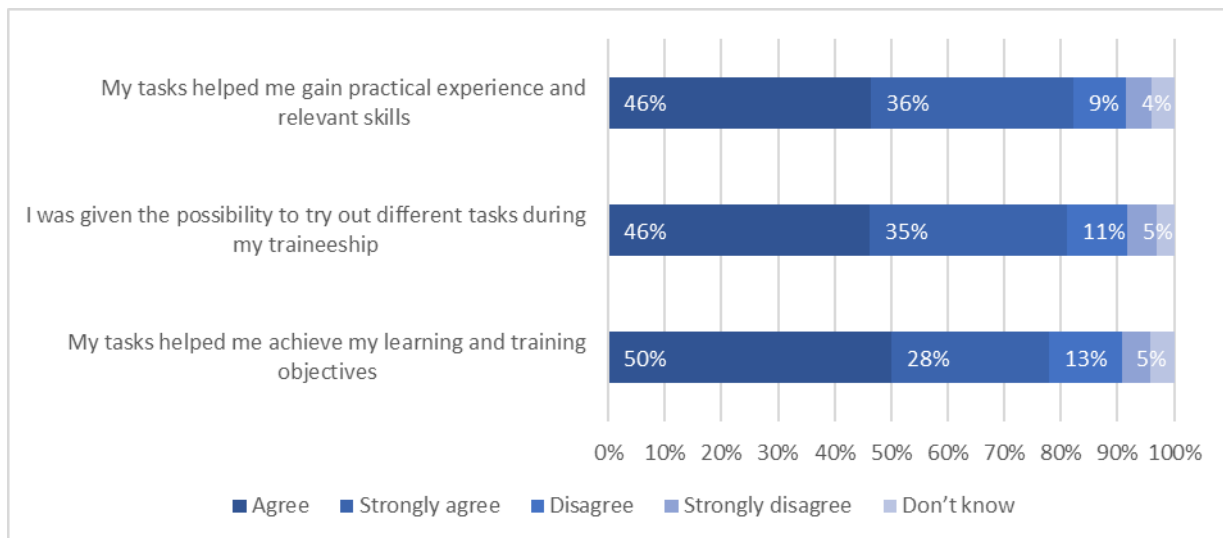
Source: QFT online survey, Ecorys, 2022, N=1836

The analysis of reported progress across all sectors indicated that respondents who undertook a traineeship in other sectors than the ones listed, arts, entertainment & recreation sectors as well as in industry were more likely to agree or strongly agree that they made progress, with 85%, 84% and 83% respectively of respondents selecting this option. On the other hand, trainees in education (24%), health & social work (21%) had a higher likelihood of disagreeing or strongly disagreeing with the statement.

6.3 Tasks during the traineeships

The survey inquired further into the type of progress made by trainees and the extent to which the given tasks facilitated their development. More than **78% of respondents either strongly agreed or agreed that the traineeship led to achieving positive outcomes**. More specifically, around half of the respondents agreed that they were given the possibility to try out different tasks during their traineeship (46%), and that the tasks helped them achieve their learning and training objectives (50%) as well as gain practical experience and relevant skills (46%), whilst over a quarter of respondents strongly agreed with all the statements.

A small share of respondents disagreed with the statements: 13% considered that the tasks did not help them achieve their learning and training objectives, 11% thought that they were not given the possibility to try out different tasks and 9% did not consider that the tasks helped them gain practical experience and relevant skills. Less than 5% disagreed strongly with all the statements.

Figure 18. To what extent do you agree with the statements below?

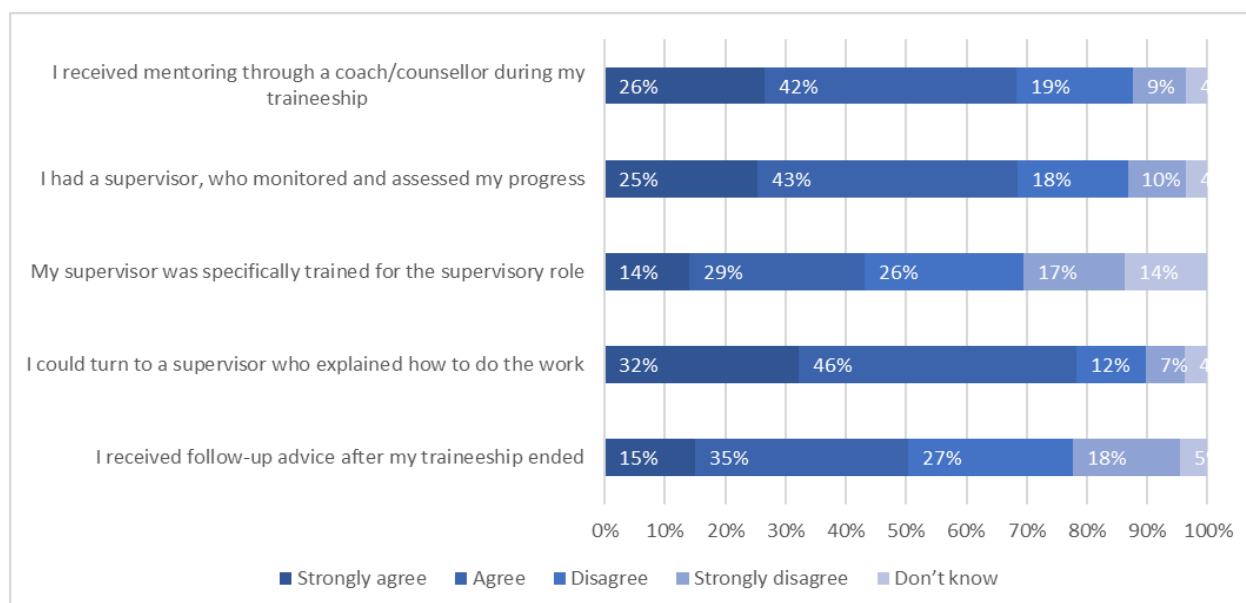
Source: QFT online survey, Ecorys, 2022, N=1836

6.4 Mentoring or supervision

About **69% of the respondents reported having a supervisor throughout their traineeship** who monitored and assessed their progress, whilst only 28% disagreed or strongly disagreed with this statement. Furthermore, a similar percentage (68%) indicated that they received mentoring through a coach/counsellor during their traineeship.

When asked about the quality of the monitoring or mentoring received, 43% of respondents agreed or strongly agreed that their supervisor was specifically trained for the supervisory role and 78% further reported that they could turn to their supervisor to explain how to do the work.

The survey then asked respondents to indicate the extent to which they received follow-up advice after the traineeship ended. Whilst half of the participants either agreed or strongly agreed that they had received this support, 45% disagreed or strongly disagreed with the statement.

Figure 19. To what extent do you agree with the statements below?

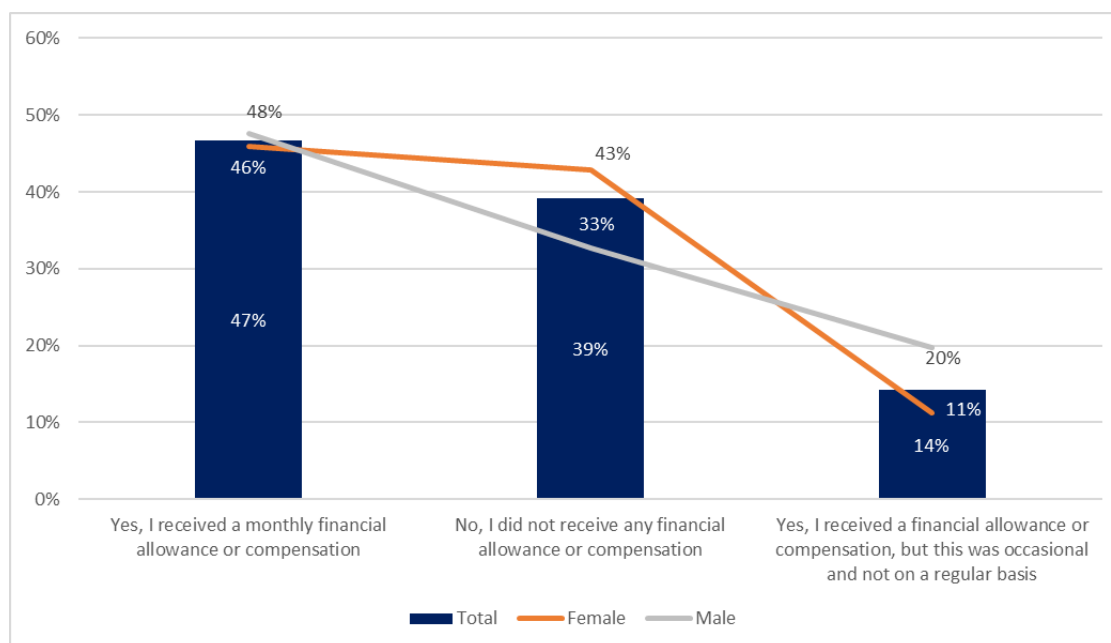
Source: QFT online survey, Ecorys, 2022, N=1836

7.0 Working conditions

7.1 Financial allowance and benefits

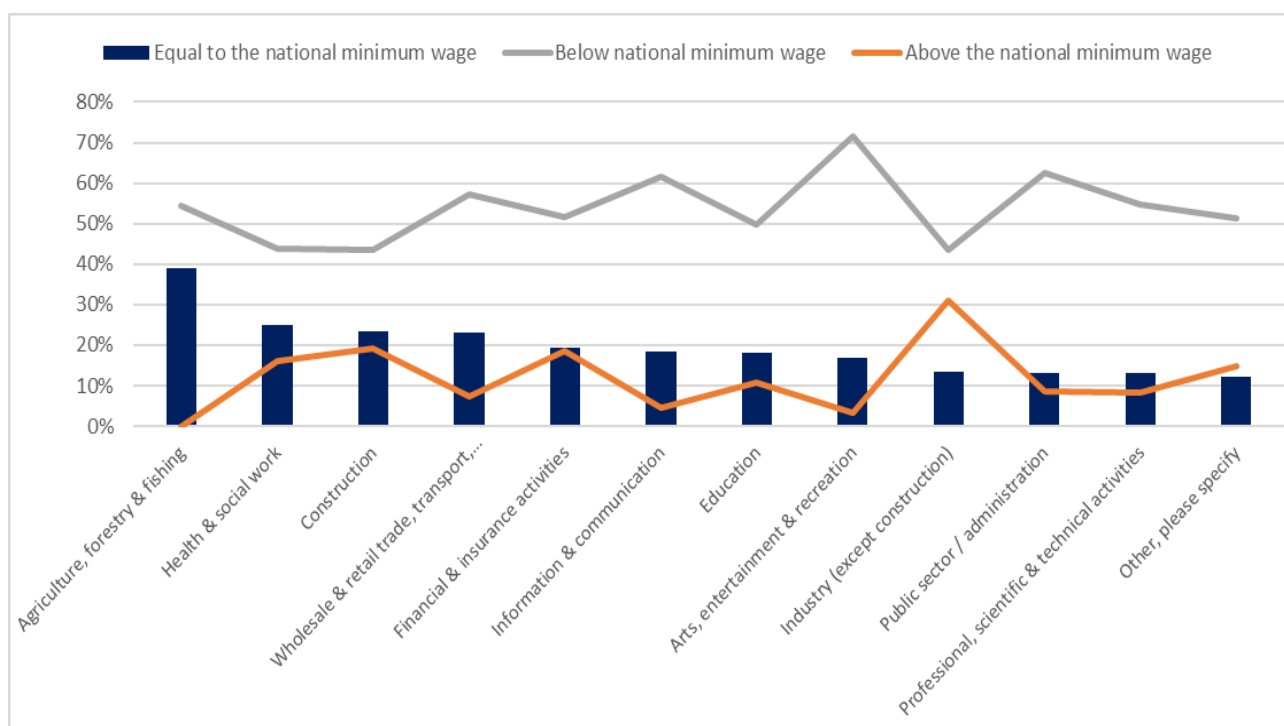
Based on the quantitative analysis of the responses, around **47% of the target audience indicated that they received a monthly financial allowance or compensation**, while 14% claimed that they received these only occasionally and not on a regular basis. On the other hand, 39% reported not having received any financial support during their traineeship.

As illustrated by Figure 20, the percentage difference between male and female respondents is relatively small when asked whether both genders received a monthly allowance or compensation. However, 43% of women reported not having received any financial support compared to 33% of men. In addition, male respondents reported having received an occasional financial allowance or compensation compared to 11% of females.

Figure 20. Financial allowance received by gender

Source: QFT online survey, Ecorys, 2022, N=1836

The respondents were also asked to clarify whether they considered the compensation value to be adequate relative to the national minimum wage, to acquire a better image of the financial support received. Overall, **54% of respondents considered that the financial allowance or compensation received during their traineeship was below national minimum wage**. This is higher among female respondents, i.e., 36%, compared to 17% of men. Moreover, 17% considered it was equal to the national minimum wage, while 12% thought it was above. 16% of surveyed trainees did not know or were uncertain.

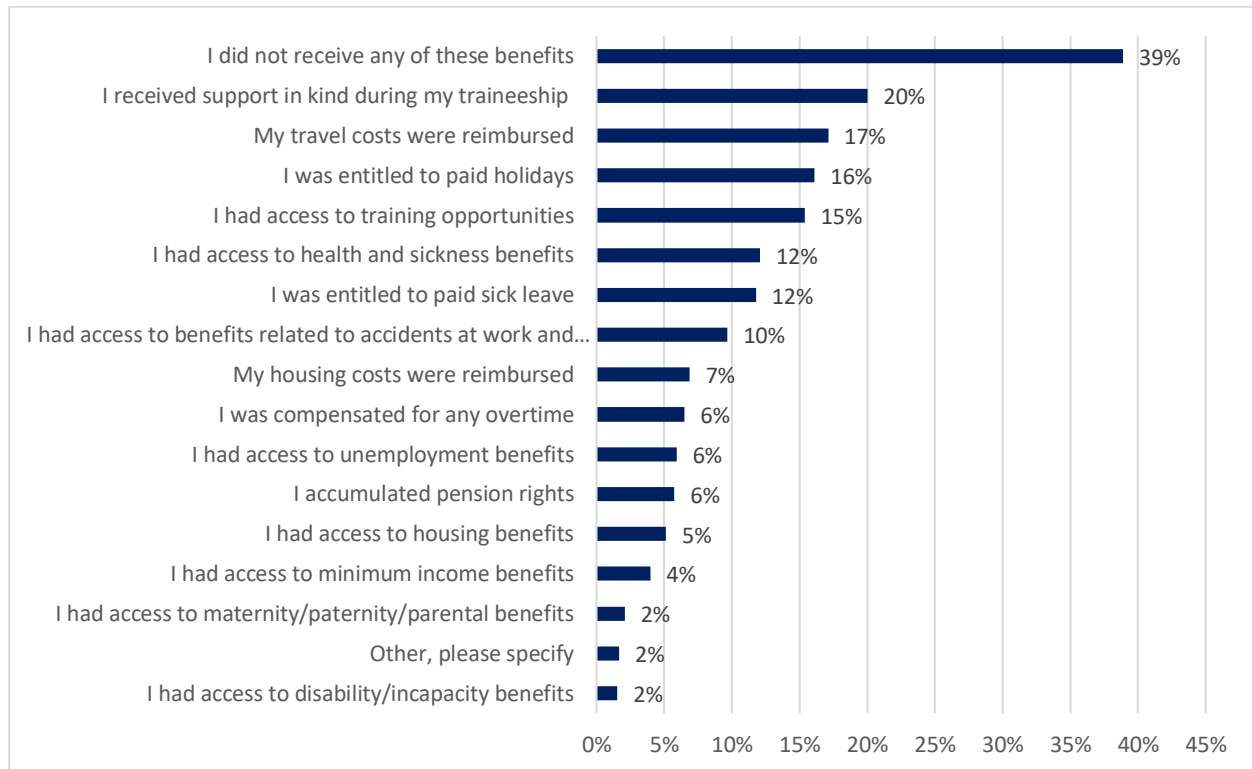
Figure 21. Compensation level relative to the national minimum wage across all sectors

Source: QFT online survey, Ecorys, 2022, N=1836

Additionally, the respondents were also asked whether the compensation was sufficient to cover the basic living costs such as rent, food etc. **The vast majority of the respondents said that it's either sufficient to a small extent (40%) or not sufficient at all (22%).** Females were less likely than males to think that financial compensation was enough to a fairly large or great extent (31% vs. 41%).

7.2 Other benefits entitlement

Figure 22. Were you entitled to any of the following benefits? (multiple choice allowed)



Source: QFT online survey, Ecorys, 2022, N=1836

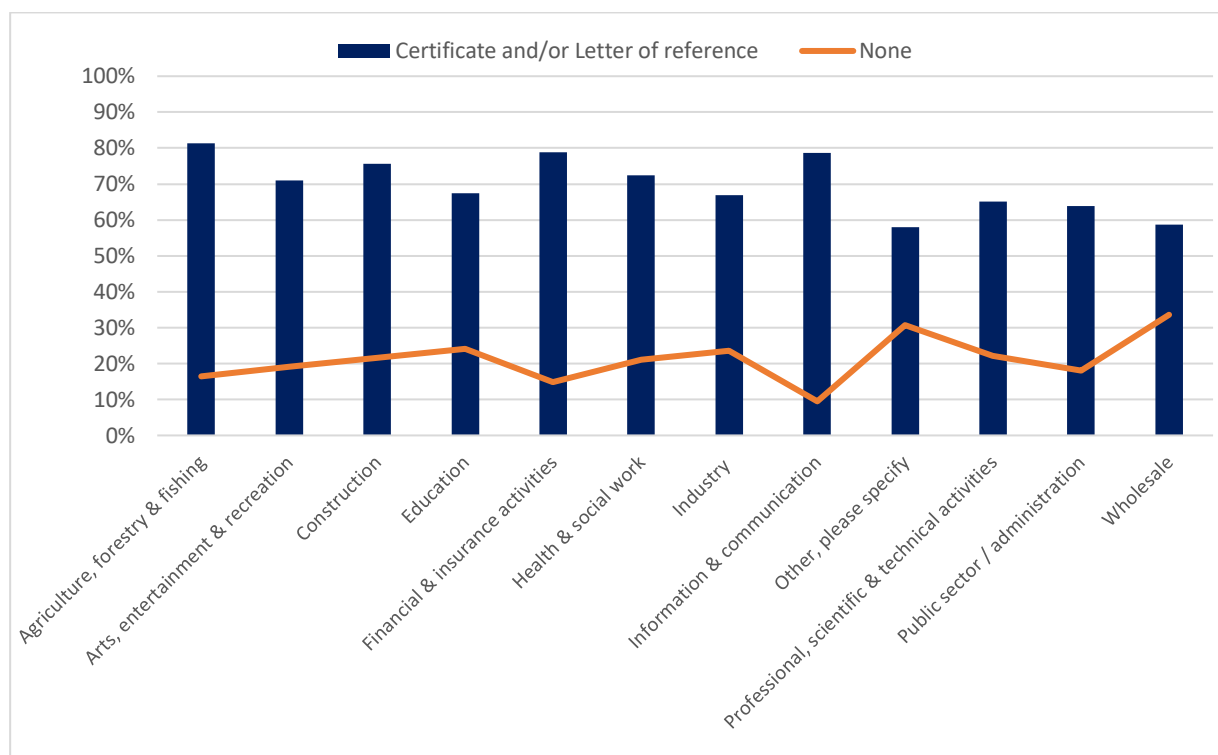
7.3 Working conditions compared to the regular employees

When asked whether working conditions were equivalent to those of regular employees, in terms of equipment, working hours, treatment, workload etc., **47% of respondents indicated that conditions were equivalent.** Furthermore, 20% of respondents indicated that the conditions were somewhat worse or much worse compared to 18% who reported that the conditions of somewhat better or much better.

8.0 Recognition of traineeships

8.1 Certification or a letter of reference

The majority of respondents (68%) reported that they had received either a certificate (32%), a letter of reference (24%) or both (12%). Only 22% indicated that they did not receive any recognition of their traineeship, whilst 10% did not know.

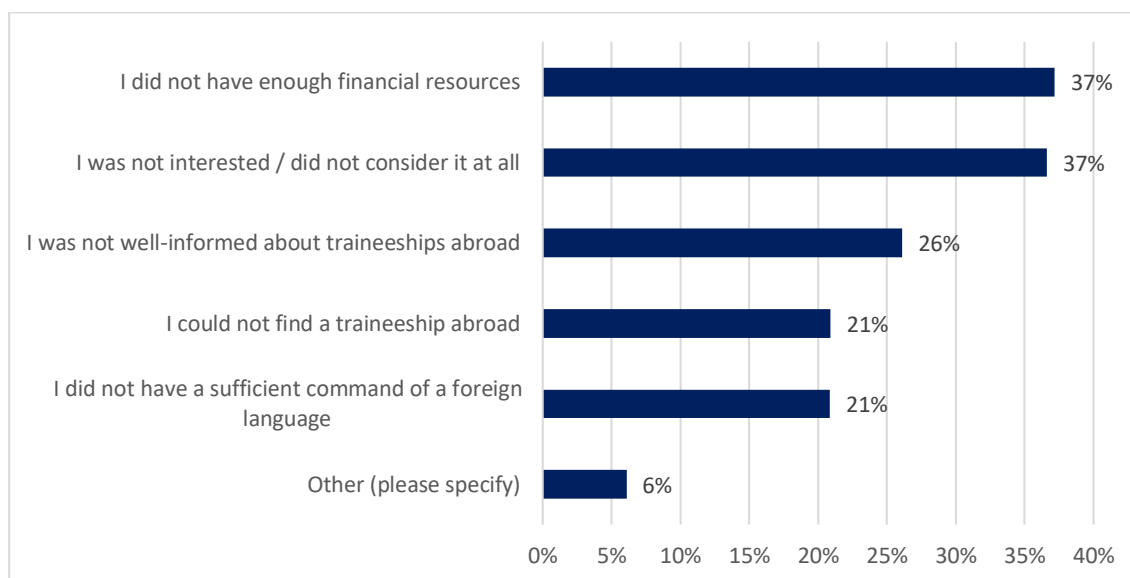
Figure 23. Recognition of traineeship by sector

Source: QFT online survey, Ecorys, 2022, N=1836

9.0 Cross-border traineeships

9.1 Main reasons for not doing a traineeship abroad

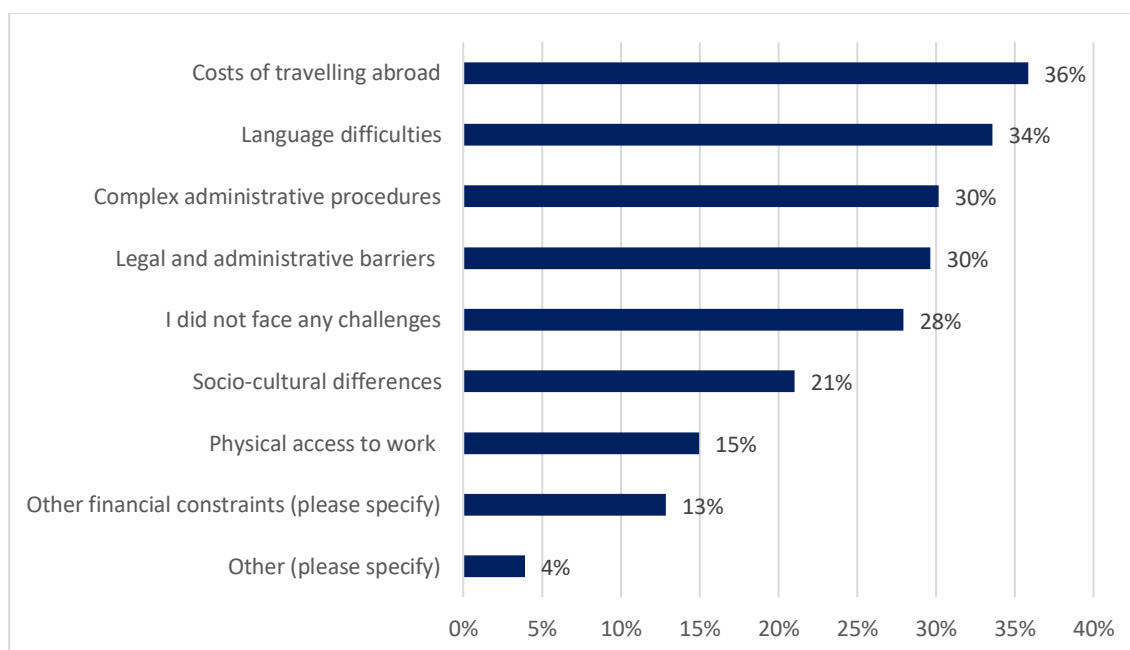
The respondents reported that **the main reason that prevented them from doing a traineeship abroad was the lack for financial resources available**, with 37% of respondents selecting this answer. The same percentage indicated that they were not interested or did not consider it at all. This was followed by not being well-informed about traineeships abroad (27%), not being able to find a traineeship abroad (21%) and not having sufficient command of a foreign language (21%).

Figure 24. What are the three main reasons that you have not done a traineeship abroad?

Source: QFT online survey, Ecorys, 2022, N=1293

9.2 Challenges faced during the cross-border traineeship

The **most frequently reported challenge encountered whilst during a cross-border traineeship was the costs of travelling abroad (36%)** while just over a third of respondents (34%) also indicated that they faced language difficulties. Other issues faced by trainees were: complex administrative procedures (30%), legal and administrative barriers such as different taxation systems, social security and pension (30%), socio-cultural differences (21%), physical access to work (15%) and other financial constraints (13%). However, 28% of respondents reported not facing any challenges during the traineeship abroad.

Figure 25. What were the challenges that you faced in your cross-border traineeship experience?

Source: QFT online survey, Ecorys, 2022, N=543

10.0 Outcomes and results

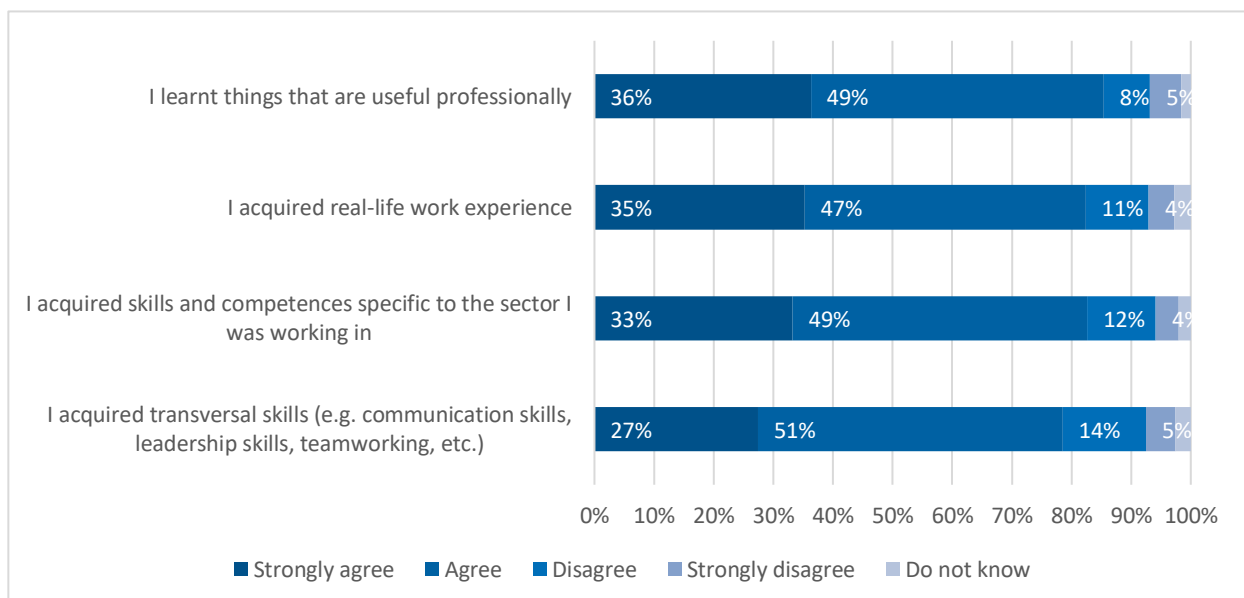
10.1 Skills and opportunities

When asked to assess the skills and work experience acquired during the traineeship, the vast majority of respondents either strongly agreed or agreed with all statements. For example, **36% strongly agreed and 49% of respondents agreed that they learnt things that are useful professionally**. Only a small share (13%) strongly disagreed or disagreed with the statement.

Most respondents (82%) also indicated that the traineeship helped them gain real-life work experience and 83% reported that they acquired skills and competences specific to the sector they were working in. In terms of the transversal skills gained such as communication skills, leadership and teamworking, 79% reporting that they've learnt skills relevant to other sector or jobs.

Across all statements, less than 15% disagreed that they've acquired skills and work experience through the traineeship and less than 5% strongly disagreed.

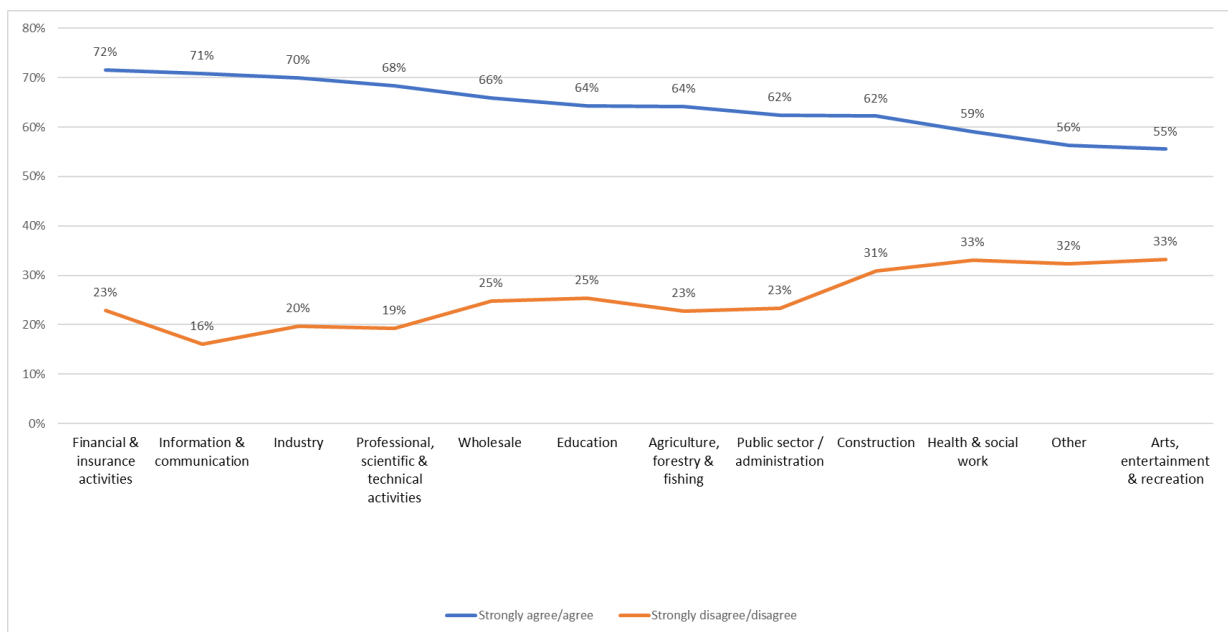
Figure 26. Acquired skills and work experience



Source: QFT online survey, Ecorys, 2022, N=1836

10.2 Ease of transitioning from school to work or job-market

More than half of respondents to the survey strongly agreed or agreed (62%) that the traineeship helped their transition from school to work easier. In comparison, a quarter of respondents (25%) either disagreed or strongly disagreed with the statement.

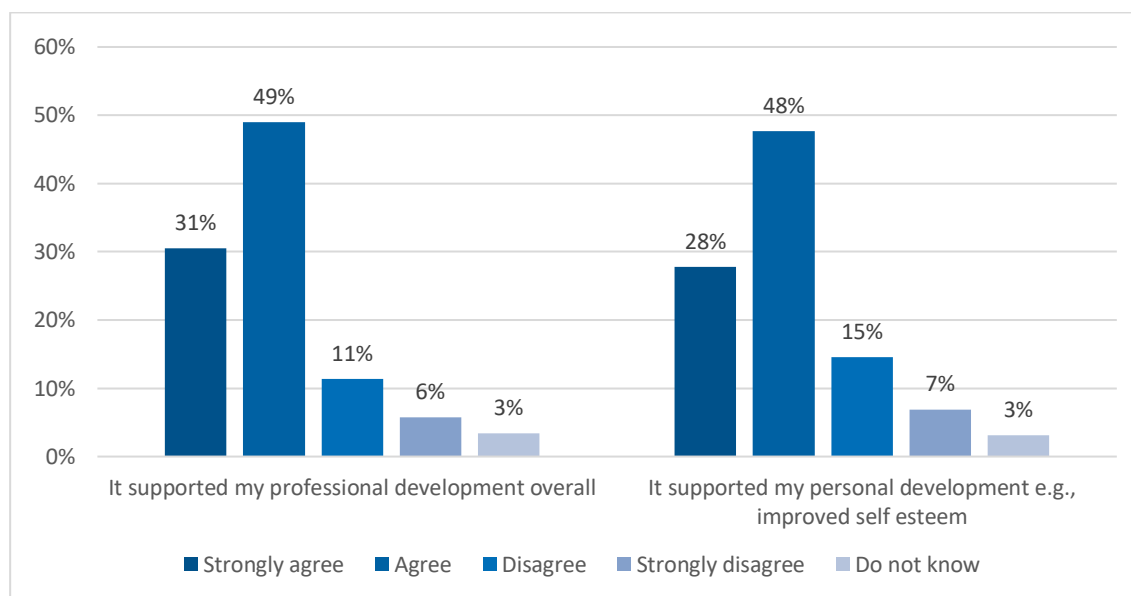
Figure 27. It made my transition from school to work easier

Source: QFT online survey, Ecorys, 2022, N=1836

As part of the survey, respondents were also asked if the traineeship made their re-entry in the job market easier. More than half of participants (56%) strongly agreed or agreed that the traineeship facilitated this aspect, whilst around 29% disagreed or strongly disagreed with the statement. A smaller share (15%) did not know.

10.3 Supporting professional and personal development

The survey also enquired about the extent to which the traineeship supported the respondents' personal and professional development. **The vast majority of respondents strongly agreed or agreed that the traineeship had helped their personal development**, such as improving their self-esteem (75%) and 80% indicated that it also supported their professional development. Around 22% of respondents strongly disagreed or disagreed that their traineeship supported their personal development and 17% did not agree that it helped their professional development overall.

Figure 28. Level of support to professional and personal development

Source: QFT online survey, Ecorys, 2022, N=1836

10.4 Networking opportunities

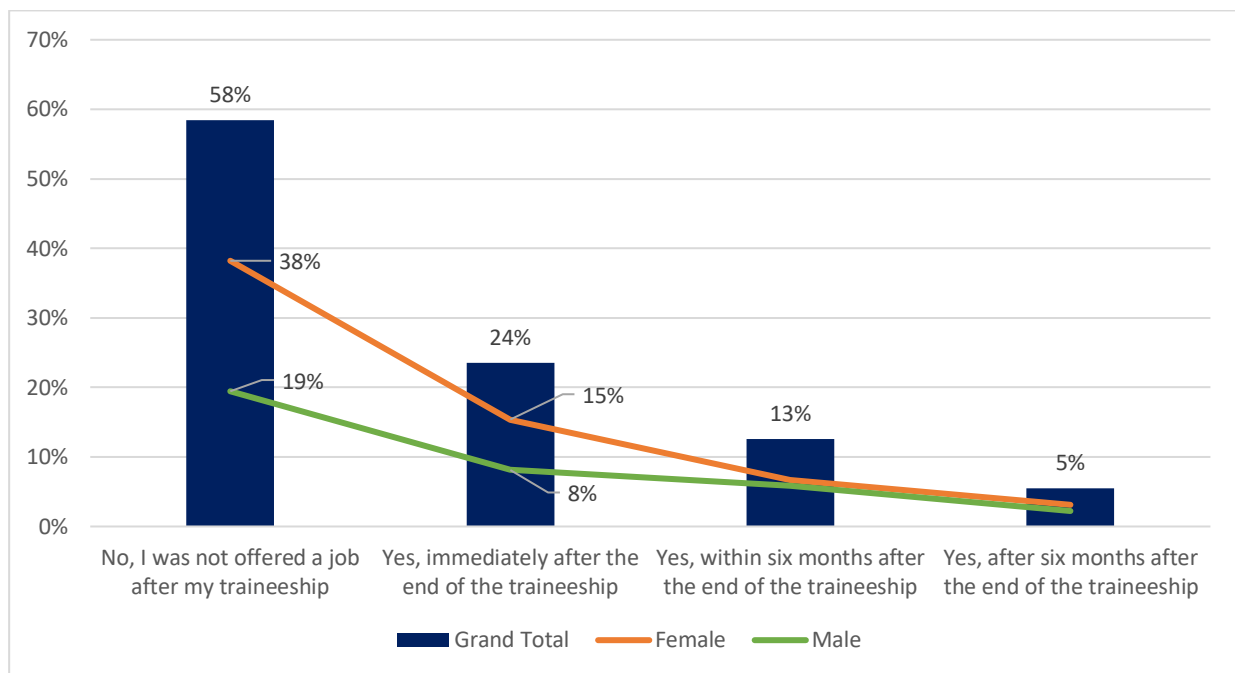
Respondents also highlighted the role of the traineeship in providing them with networking opportunities during its duration. More than 68% of those who took part in the survey either strongly agreed or agreed that they had the opportunity to widen their network. Slightly over a quarter of respondents (28%) disagreed or strongly disagreed with this statement.

10.5 Job offers at the end of the traineeship

When asked if the traineeship was or will be helpful to finding a regular job, **67% either strongly agreed or agreed that their traineeship was indeed helpful or will be helpful in securing employment.** However, 25% disagreed or strongly disagreed with the statement and 8% indicated that they do not know.

More than half of respondents (58%) reported that they were not offered a job after their traineeship. Women were more likely to report that they were not offered a job, with 38% selecting this compared to 19% of male respondents. Around 24% of the trainees surveyed reported that they were offered a job immediately after the end of the traineeship. Within this group, the percentage of women who reported receiving a role was higher than that of men (15% vs. 8%).

Overall, the share of respondents being offered employment decreased with time after the end of the traineeship. 13% of respondents received an offer within six months of finalising their traineeship and 5% after six months had passed.

Figure 29. Job offers by gender

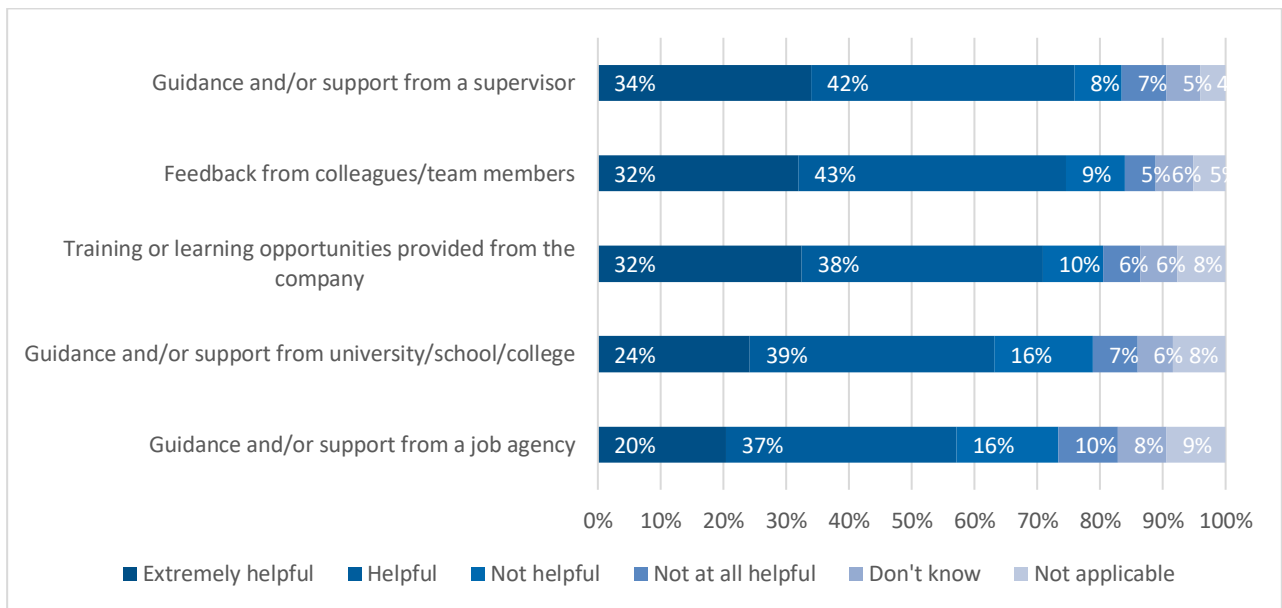
Source: QFT online survey, Ecorys, 2022, N=1836

When asked who offered them the job, **65% of respondents indicated that they secured the role through the same employer they worked for during the traineeship**; 27% were received an offer from an employer they got in touch with during their traineeship and 9% found work with an employer not related to their traineeship.

Overall, 46% of respondents considered that the traineeship helped them to a large extent to get the job offer and 33% thought this helped to a fairly large extent.

10.6 Types of support that would have been helpful in finding a job

The vast majority of respondents considered that the following types of support would have been extremely helpful or helpful in finding a job: guidance and/or support from a supervisor (76%); feedback from colleagues/team members (75%) and training or learning opportunities provided from the company (71%).

Figure 30. Types of helpful support

Source: QFT online survey, Ecorys, 2022, N=1836

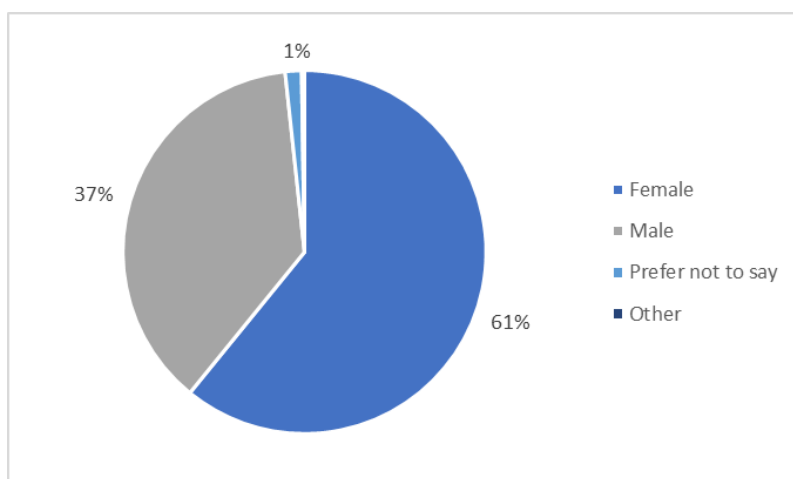
11.0 Young people with no traineeship experience

Out of the respondents who had no traineeship experience, 58% of them were interested in doing a traineeship in the future. The typical respondent's profile is described below.

11.1 Young people without traineeship experience but ARE planning to do a traineeship

Demographic background

The majority of respondents interested in doing a traineeship in the future were female (61%), compared to just 37% identifying as male. This is consistent with the distribution of gender amongst people who have done traineeships as well. Only 2% identified as having a disability.

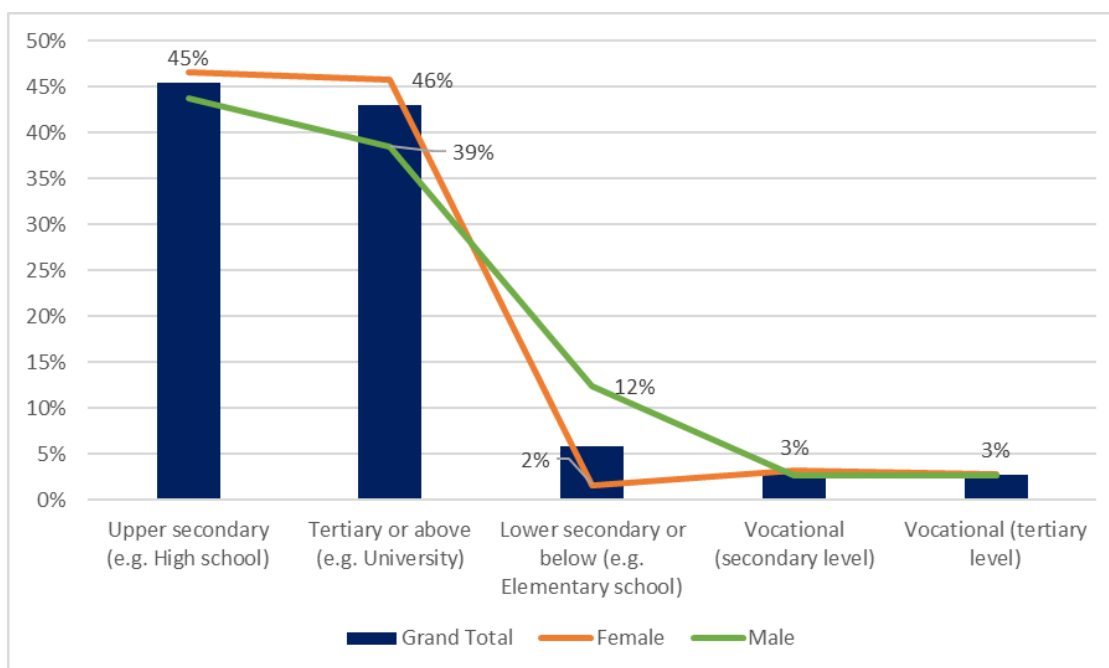
Figure 31. Gender distribution among potential trainees

Source: QFT online survey, Ecorys, 2022, N=409

Among the respondents with no experience of traineeships but who would be interested in doing a traineeship in future, 20% were from Germany. Croatia had 16%, Spain had 12%, Poland had 11%, and Romania had 11%. Malta, Netherlands, Austria, Denmark, Cyprus, Hungary and Slovakia had no respondents without traineeship experience who were interested in doing a traineeship in the future.

The most common level of education amongst potential trainees was upper secondary (45%). This is probably due to the fact that many school pupils will not have had the opportunity to do a traineeship during their school years but intend to do one once they have left school. Tertiary education (or above) followed closely with 43%. Lower levels of education and vocational education was less common among potential trainees making up around 12% of respondents.

As Figure 32 illustrates, the share of females with a tertiary or above level of education was higher compared to male respondents (46% vs. 39%), whilst the percentage of male potential trainees at the lower secondary level was higher in comparison to women (12% vs. 2%).

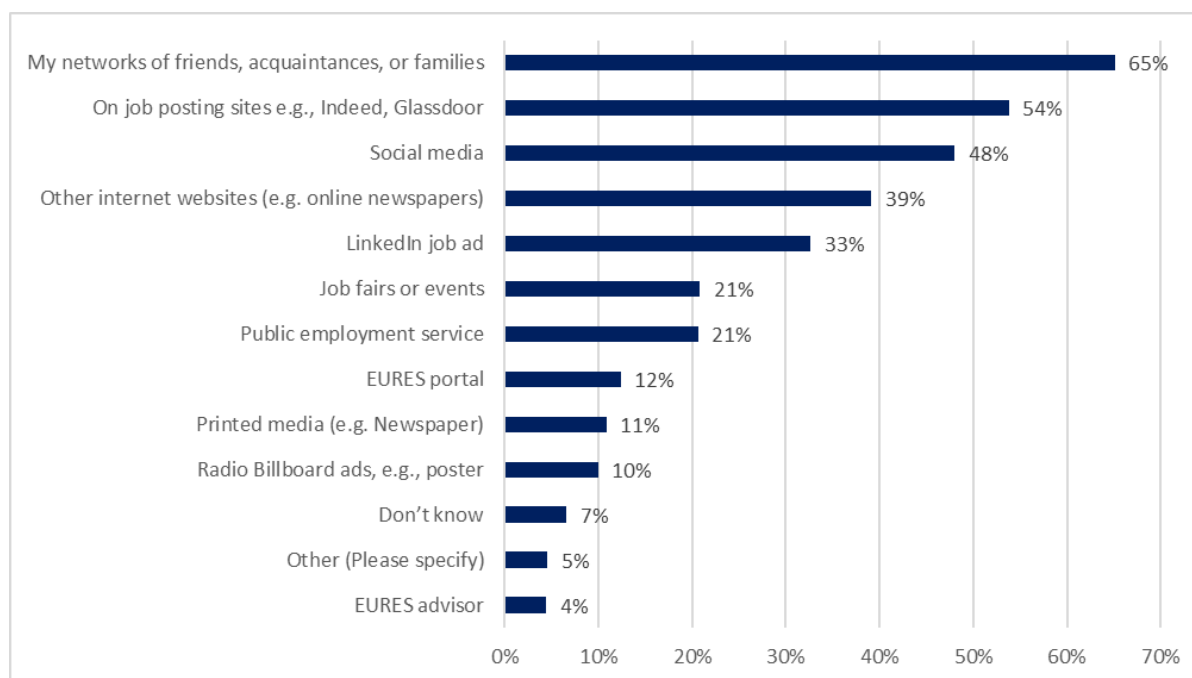
Figure 32. Level of education by gender

Source: QFT online survey, Ecorys, 2022, N=409

Channels used to find traineeships

As Figure 33 shows, **the most popular channels for finding traineeship opportunities amongst potential trainees are through respondents' own networks (65%), on job posting sites (54%), and social media (48%).** These three channels were the most common combination given by respondents as well.

Figure 33. Channels used to find traineeship opportunities

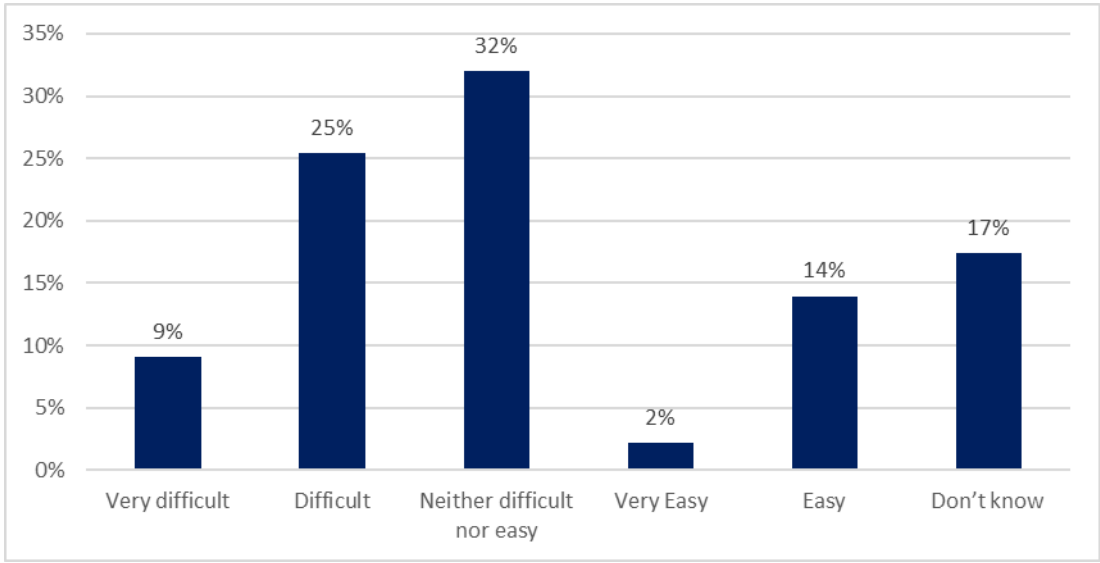


Source: QFT online survey, Ecorys, 2022, N=931

Ease of finding traineeship opportunities

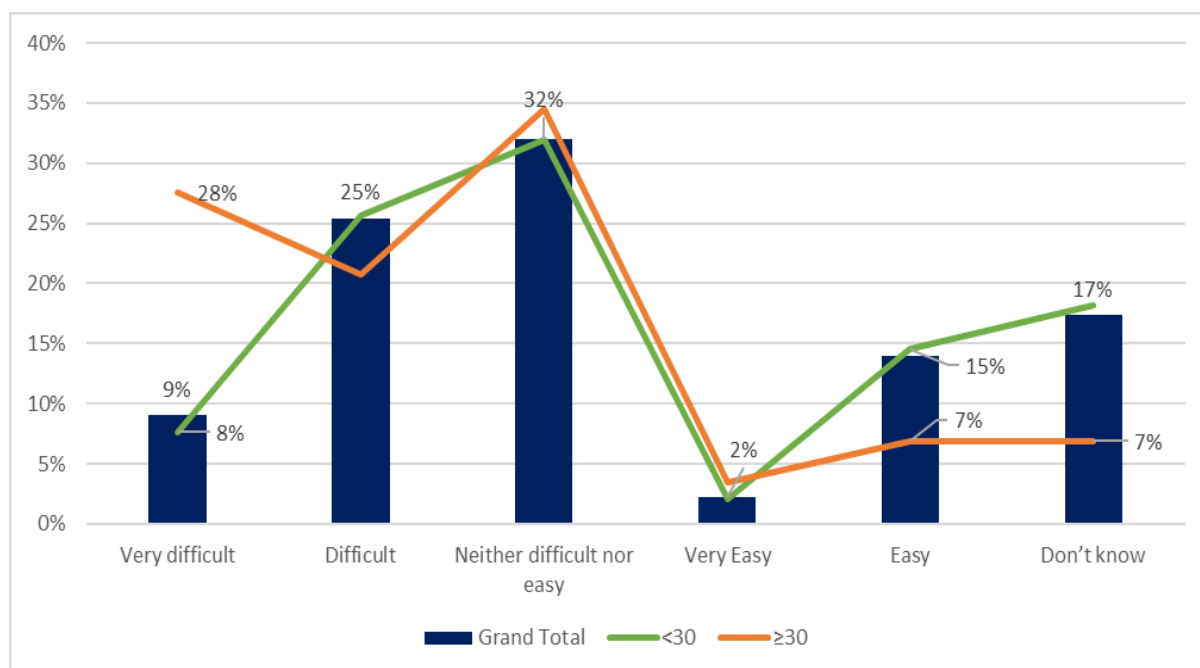
A reason for selecting multiple options to search for traineeships could be the relative difficulty respondents have to find traineeship opportunities. Only 2% of respondents found it “Very easy” to find information about traineeship opportunities in their country of choice, as opposed to **32% finding it “Neither difficult nor easy” and 25% finding it “Difficult”.**

Figure 34. Ease of finding traineeship opportunities among potential trainees



Source: QFT online survey, Ecorys, 2022, N=409

Respondents aged 30 or above over-index on finding it “Very difficult” to find traineeship opportunities at 28%, compared to 8% of under-30s.

Figure 35. Ease of finding traineeships by age group

Source: QFT online survey, Ecorys, 2022, N=409

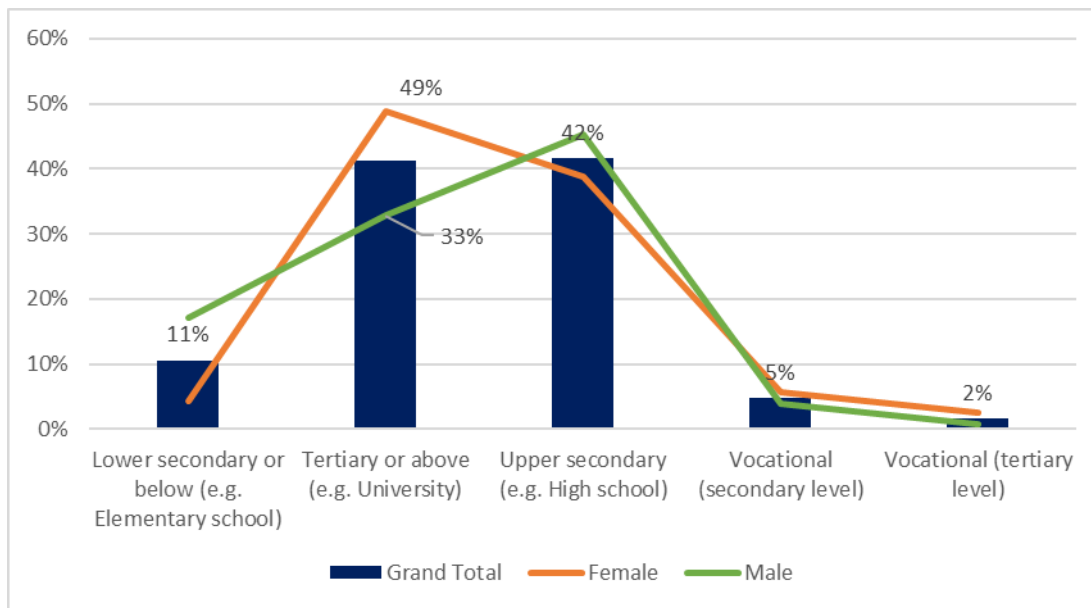
11.2 Young people without traineeships experience and not planning to do a traineeship

Approximately 42% of respondents who did not have any traineeship experience said that they would not want to do a traineeship in the future. The typical respondent's profile is described below.

Demographic background

More than half of respondents with no traineeship experience were females (55%), whilst 44% identified as male. Only 1% preferred not to disclose their gender. The vast majority of respondents with no interest to complete a traineeship were below 30 years of age (85%), whilst 15% were above 30.

The education levels of respondents who are not interested in doing a traineeship is predominantly upper secondary (42%) or tertiary (41%), with very few respondents having been in vocational education, as can be seen in the chart below. Females were more likely to have a tertiary education or higher education level (49% compared to 33%).

Figure 36. Education level of respondents not interested in completing a traineeship

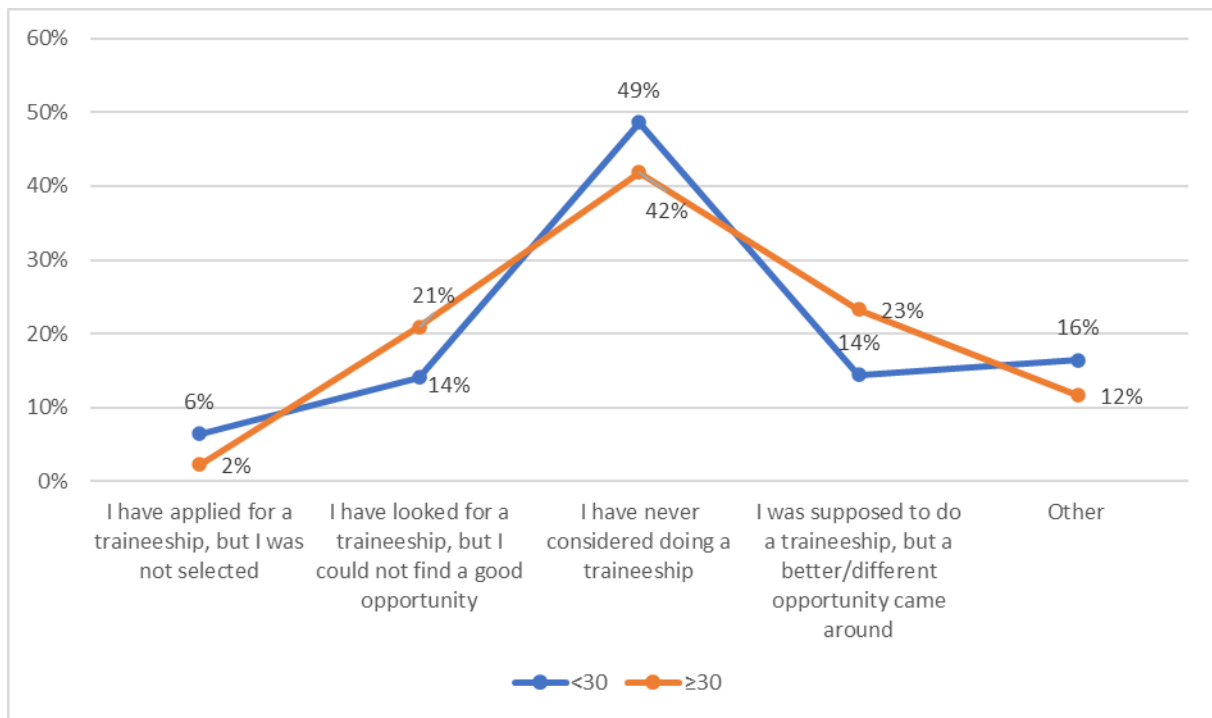
Source: QFT online survey, Ecorys, 2022, N=293

The countries with the highest number of respondents who are not interested in doing a traineeship in the future are the same as the countries from which there were the most potential trainees. These were Germany (24%), Croatia (17%), Poland (14%), and Spain (9%).

Reasons for not doing a traineeships

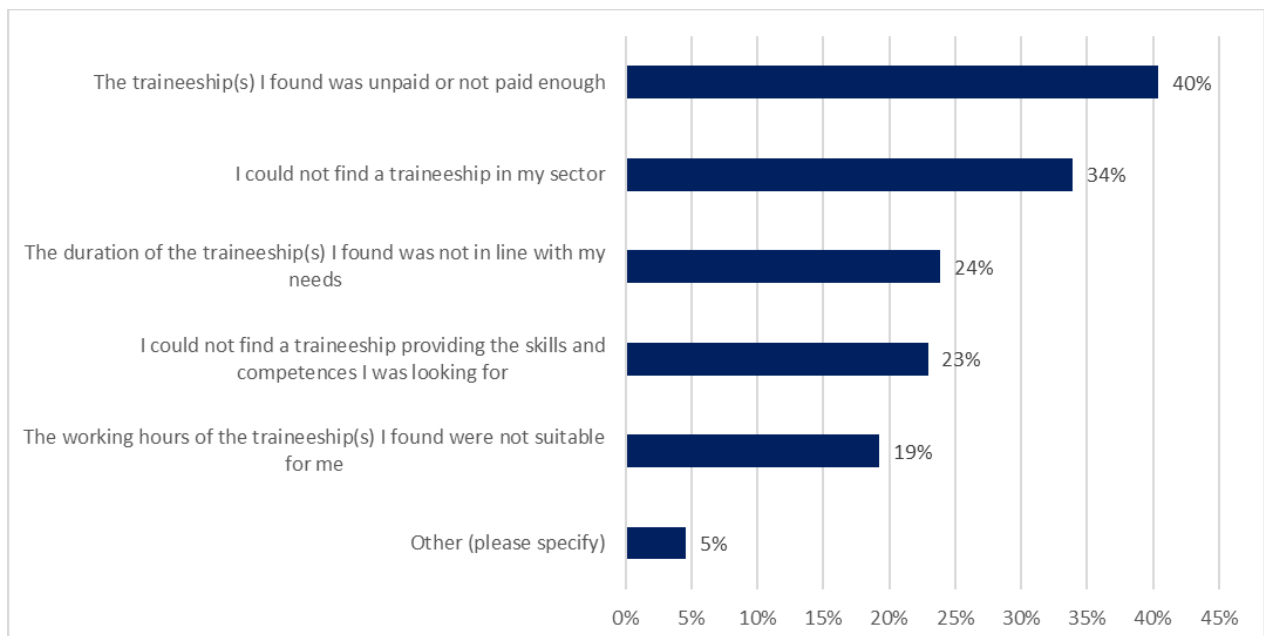
The **main reason given by 47% of respondents as to why they have never taken part in a traineeship is simply that they “never considered doing a traineeship”**. The second most common reason selected was “I was supposed to do a traineeship, but a better/different opportunity came around” (16%), followed by “I have looked for a traineeship, but could not find a good opportunity” being the second most common (15%). Only 6% of people said that they had applied for a traineeship but were not selected.

Female respondents over-index when it comes to having applied for a traineeship but not being selected (9%), compared to 2% of male respondents. And respondents aged 30 or above over-index (23%) on “a better/different opportunity came around”, which is probably to be expected with more work experience, whilst 49% of those aged below 30 ‘never considered doing a traineeship’ compared to 42% of respondents above 30.

Figure 37. Reasons for not doing a traineeship by age group

Source: QFT online survey, Ecorys, 2022, N=293

Respondents were also asked the reasons as to why they had been unable to find a good traineeship opportunity. **The most important factor in not finding a good enough opportunity was linked to traineeships not being sufficiently well paid** with 40% of respondents listing this as one of the reasons for not finding a good opportunity, followed by not being able to find a traineeship in their sector (34%).



Source: QFT online survey, Ecorys, 2022, N=109

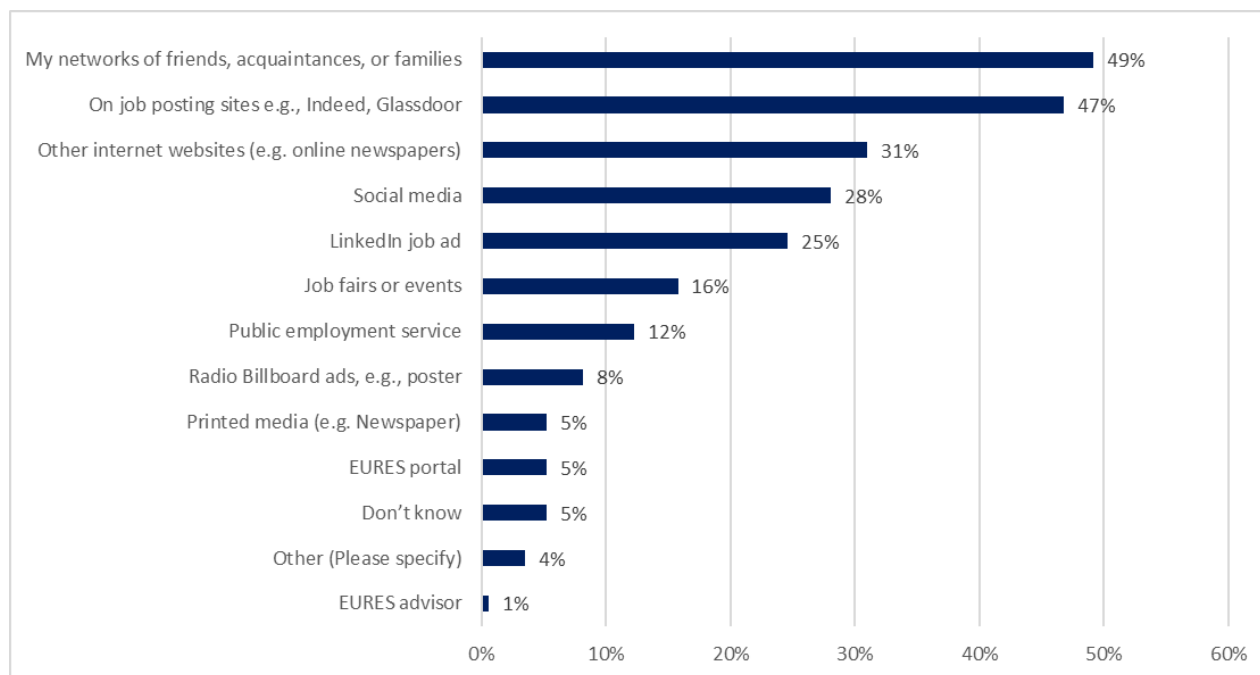
Moreover, **24% of respondents indicated that the duration of the traineeship was not in line with their needs**. Out of these respondents, the majority (69%) indicated that the traineeships they had found

were to last 6 months or less. This is compared to 27% who found traineeships lasting between 7 and 12 months, and 4% who found traineeships lasting over 12 months.

Channels used to find traineeships

As Figure 38 below indicates the primary channels used by respondents with no experience of traineeships and who want to do a traineeship in the future are through their networks (49%), followed by using online sites, such as job sites (47%) and other internet sites (31%).

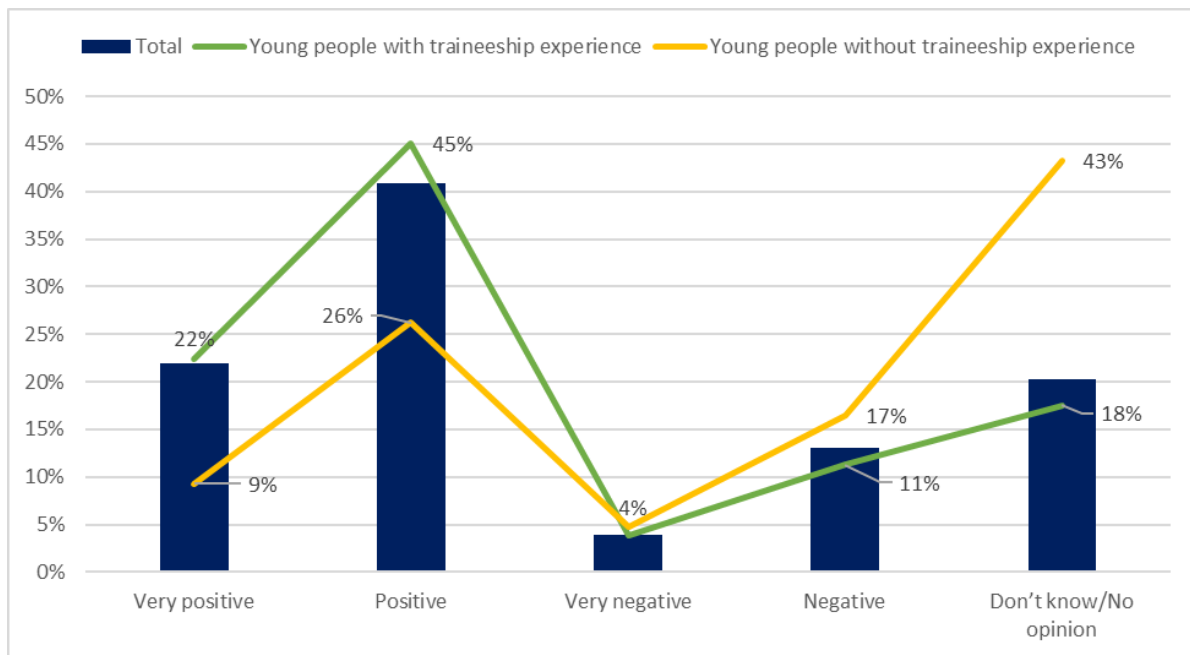
Figure 38. Channels used to find traineeships



Source: QFT online survey, Ecorys, 2022, N=171

12.0 Overall opinion about the traineeships

The **majority of respondents had a positive or very positive attitude regarding traineeships (62%)** compared to 15% who reported having a negative opinion, and 20% who indicated that they don't know or have no opinion. As Figure 39 illustrates, young people with traineeship experience were more likely to report having a very positive (22% vs. 9%) and positive (45% vs 26%) compared to young people with no traineeship experience. The latter group was also more likely to select 'Don't know/No opinion' when asked to rate their overall attitude to traineeships.

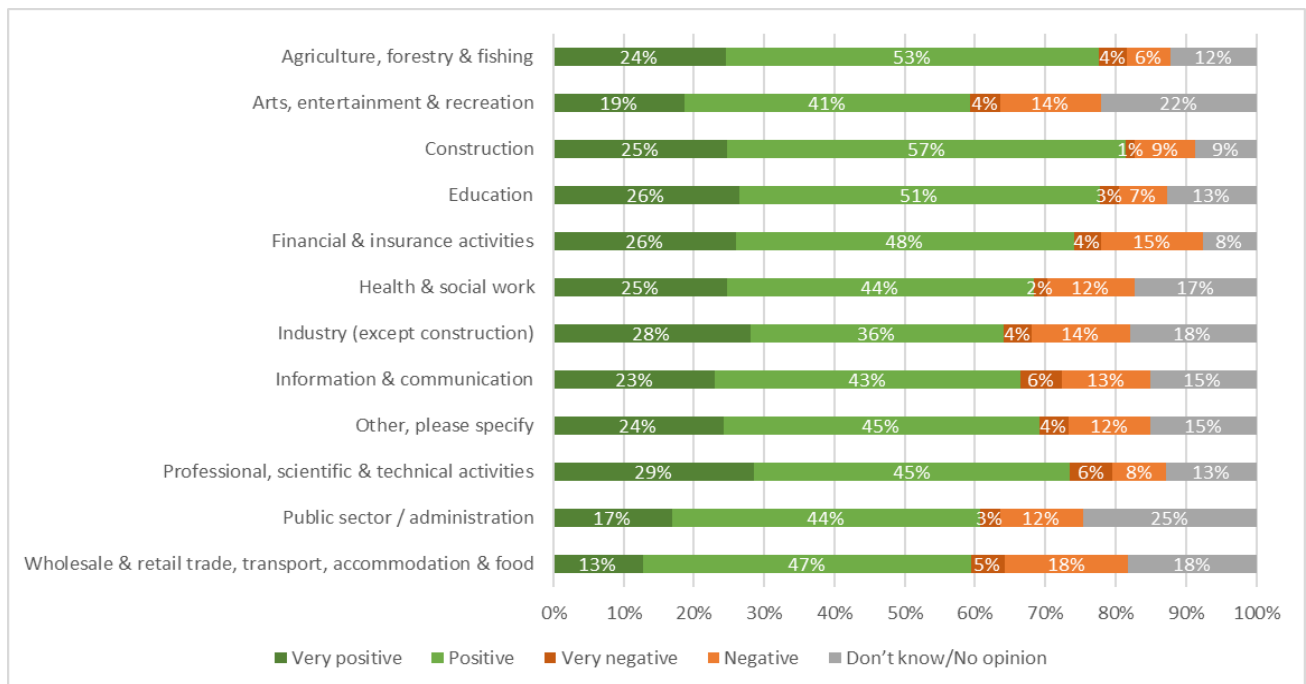
Figure 39. Overall opinion about traineeship by level of experience

Source: QFT online survey, Ecorys, 2022, N=3787

There is little variation in terms of overall attitude towards traineeships by gender or age group.

Respondents with a lower secondary level or below qualification level were more likely to select 'Don't know/No opinion' and less likely to report having a very positive or positive attitude towards traineeships. However, there are no significant differences in the responses of young people with other qualification levels.

Construction (81%), Education (78%) Agriculture, Forestry and Fishing (78%) trainees are most positive about traineeships, with more than 7 out of 10 stating so. In comparison, trainees in the Arts, leisure & recreation industry (19%) and those in the Wholesale & retail trade, transport, accommodation & food sector (22%) reported having a negative or very negative opinion about traineeships.

Figure 40. Overall opinion about traineeship by sector

Source: QFT online survey, Ecorys, 2022, N=3787

The respondents were further asked to elaborate their opinion about traineeships. A **large share of the trainees, i.e., 20% said that one of the ways to improve traineeships is by improving the compensation**. Some trainees also expressed that several entry-level roles are being replaced by traineeship position to cut down on costs.

Factors improving traineeship experience

The respondents were asked what factors may have improved traineeship experiences in their home country or in the country where they completed their internships. **Respondents indicated that being compensated or sufficiently compensated for their work would have been beneficial**. This is similar to what we saw in section 11.2 above, where a substantial portion of respondents believe they aren't paid enough to cover basic expenses. The results of the survey show that this creates even more issues if the traineeships are held abroad, where living costs and expenditures can be higher. **Some respondents advocated for the outlawing of unpaid or low-wage traineeships in this regard**.

Getting proper support from the educational establishments as well as the companies where the respondents did their traineeship was another suggested way of improving traineeships. The type of support that respondents are looking for includes both career related support such as career guidance, finding traineeship opportunities, supervision from the university and employers/colleagues as well as support on a personal level e.g., finding accommodation and adjusting into a new country, dealing with administrative things. There were also **some suggestions for increasing diversity and inclusion in traineeship opportunities (e.g., opportunities for older people, wheelchair accessibility)**.

The respondents also mentioned that the length of the traineeships could be extended to give them more learning opportunities. This is more common in some industries than others; for example, respondents in the public sector/administration stated their brief traineeships duration could have been prolonged. Furthermore, the respondents stated that their daily work hours could have been reduced to compensate for not being appropriately compensated and having insufficient responsibilities.

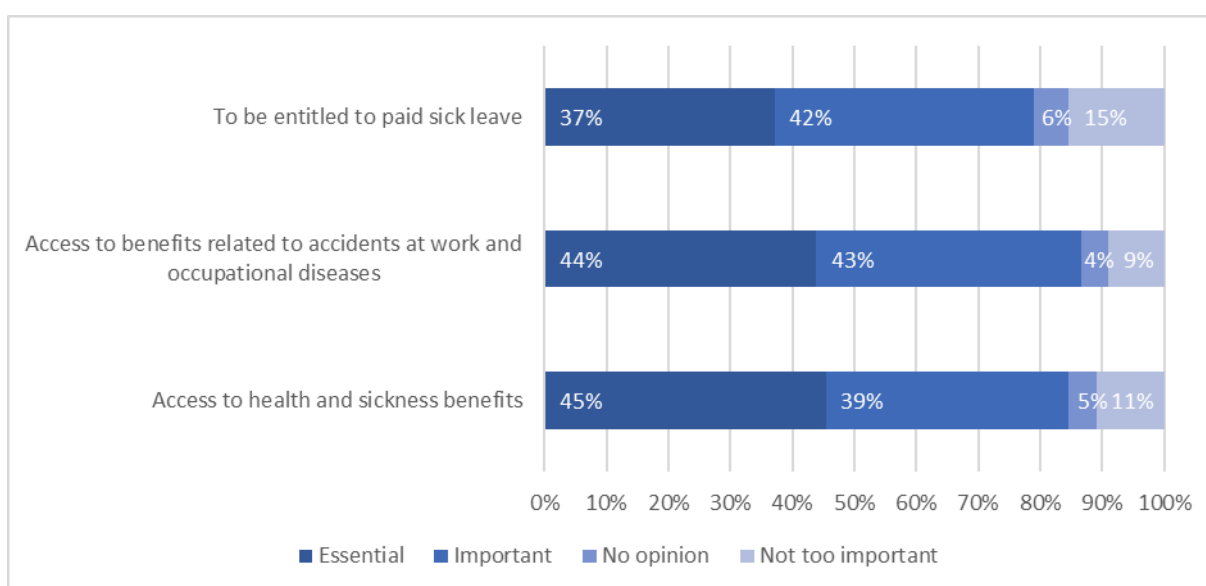
Furthermore, a smaller share of respondents stated that **getting more learning opportunities** – e.g., getting access to courses online, continuous supervisor or mentors could have been helpful in improving their traineeship experience.

Importance of traineeship elements

Health benefits

Almost half of respondents considered it essential to have access to health and sickness benefits (45%) and access to benefits related to accidents at work and occupational diseases (44%), whilst 39% and 42% respectively considered these benefits important. In comparison, 42% of respondent thought that being entitled to paid sick leave was important whilst 15% rated this benefit as not too important.

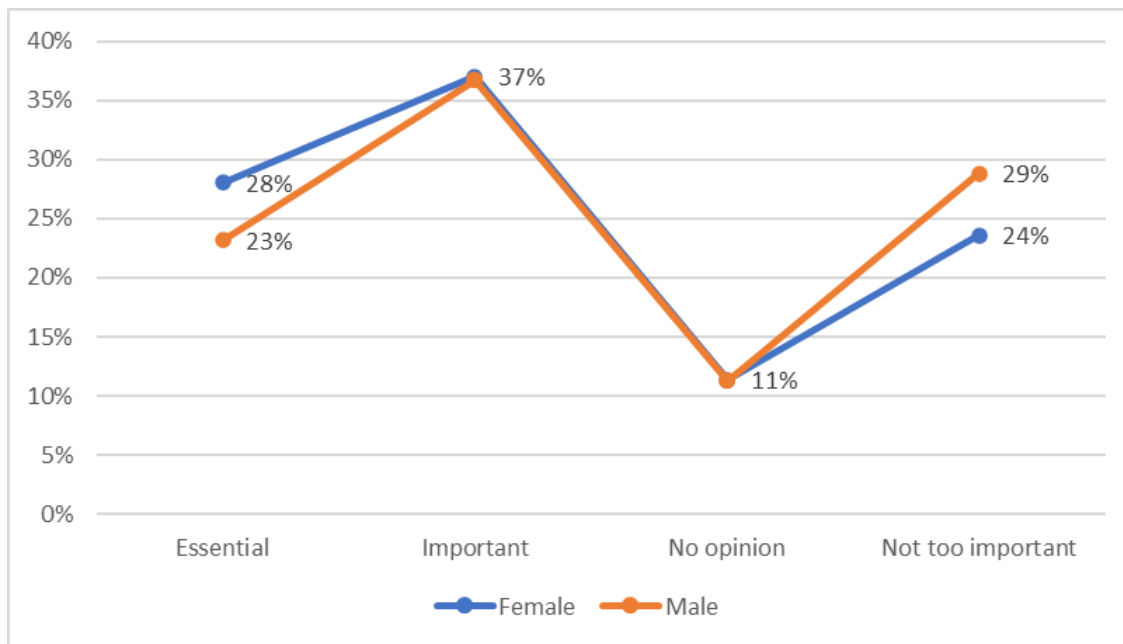
Figure 41. Importance of health benefits



Source: QFT online survey, Ecorys, 2022, N=3787

Parental rights

Around 70% of the respondents said that it is either essential or important to have access to maternity/paternity or parental benefits during the traineeship while 11% had no opinion and 25% considered this as not too important. Among these, **women were likelier than men to say that it is essential to have access to maternity/paternity/parental benefits**. On the other hand, a slightly higher share of male respondents considered these benefits as not too important (29% vs 24%).

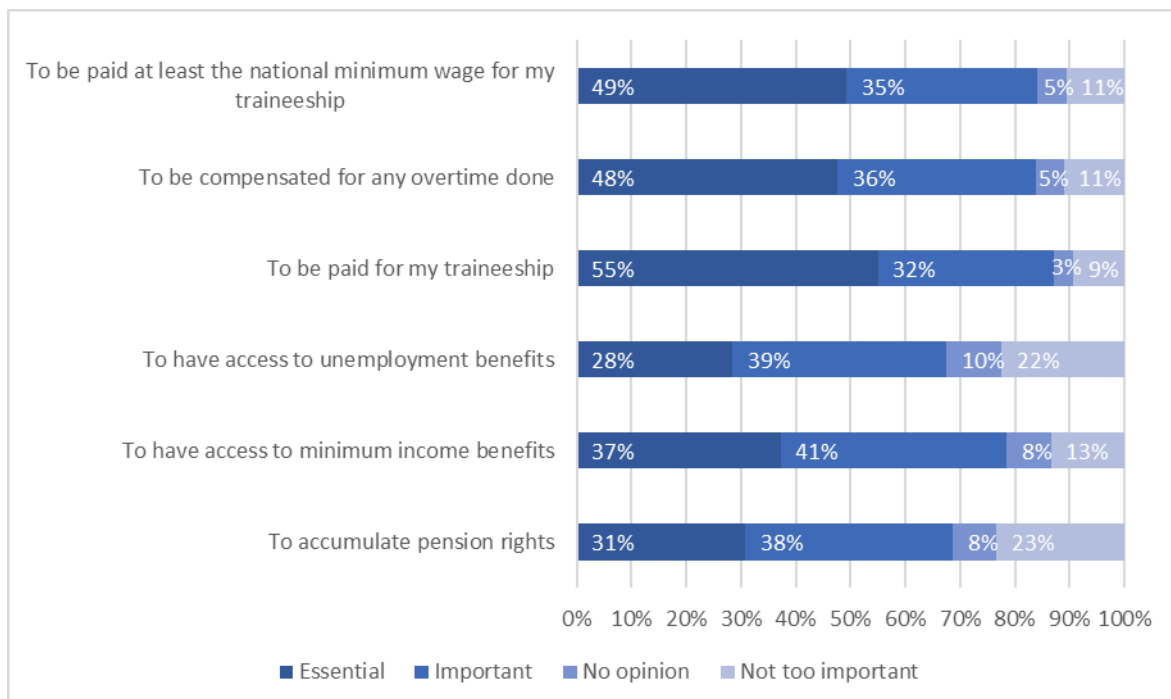
Figure 42. Importance of access to parental rights during traineeship

Source: QFT online survey, Ecorys, 2022, N=3787

Income and compensation

With nearly 87% of respondents thinking it's essential or important to be paid for the traineeship, this element stands out as one of the most important for traineeships. There was very little variation between sectors and genders.

This is then followed by being paid the national minimum wage (84%) and being paid for any overtime done (84%).

Figure 43. Importance of compensation and pay benefits during traineeships

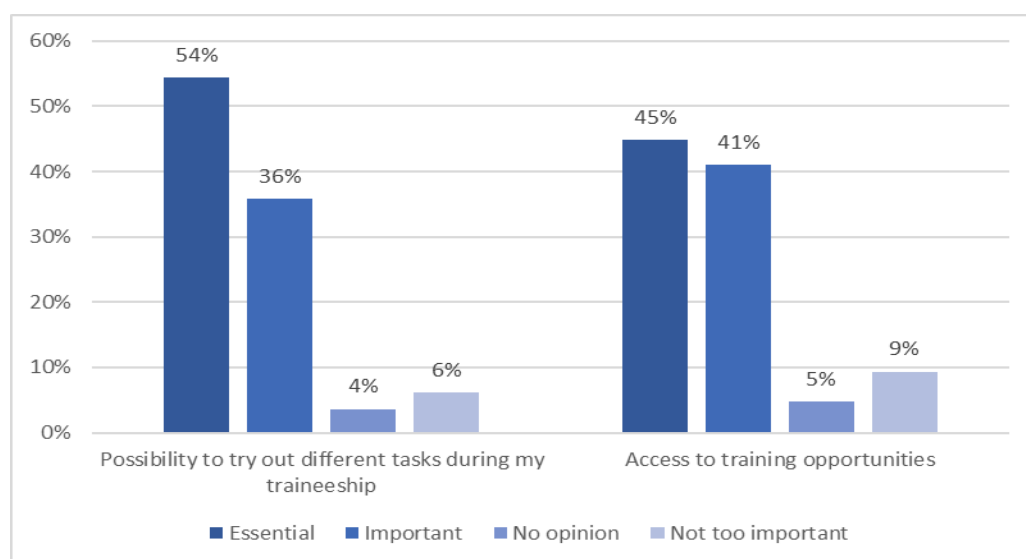
Source: QFT online survey, Ecorys, 2022, N=3787

Accumulating pension rights and having access to unemployment benefits was considered not too important by 23% and 22% of respondents.

Learning opportunities

Survey respondents were also asked the importance of benefits relevant to their professional development. Half of trainees (54%) considered that the possibility of trying out different tasks during the traineeship was essential compared to 45% and 41% who selected access to training opportunities as being essential or important.

Figure 44. Importance of learning opportunities during traineeship

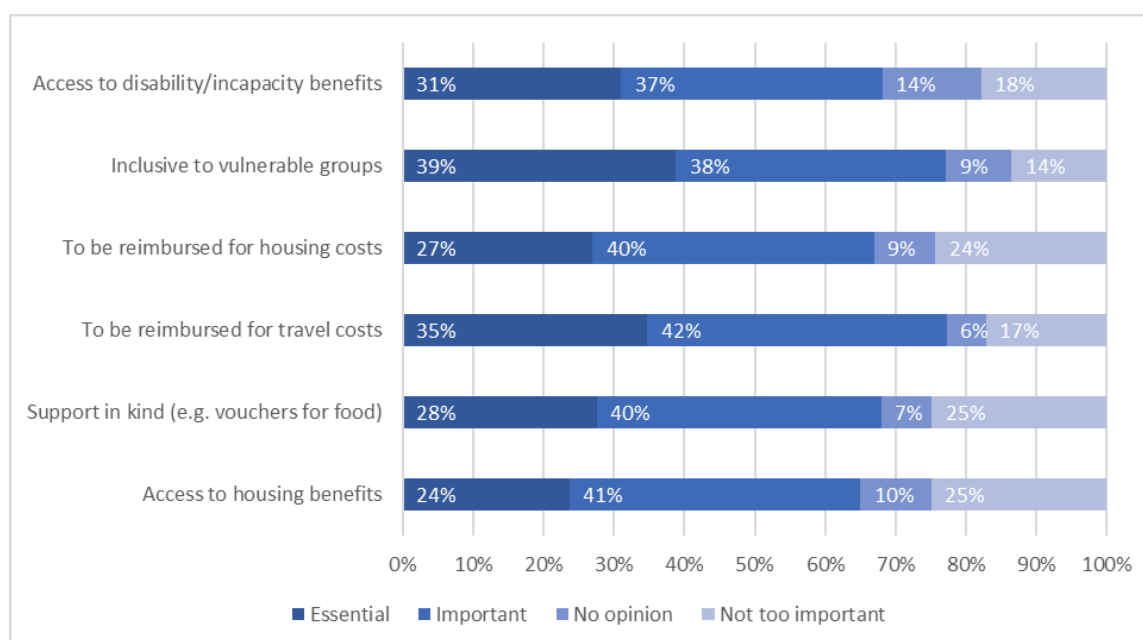


Source: QFT online survey, Ecorys, 2022, N=3787

Other benefits

Inclusiveness towards vulnerable groups was also deemed as one of the most essential elements of the traineeship (39%), which is then followed by the opportunity to be reimbursed for travel costs, which was considered essential by 35% of trainees. Access to housing benefits and support in kind were considered not too important by 25% of respondents.

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Source: QFT online survey, Ecorys, 2022, N=378

Annex 9: Costs and Benefits table

			Citizens/consumers		Businesses		Administrations	
Cost/Benefit	Cost/Benefit description	Type (one-off or recurrent)	Quantitative	Comment	Quantitative	Comment	Quantitative	Comment
Direct costs								
Adjustment costs	Implementation costs associated with implementing new legislation in line with the QFT	One-off	Not applicable	Not applicable to this stakeholder	Not available	Implementation costs incurred by businesses likely to be low one-off costs of familiarisation with any new legislation in place.	Not available	For policy makers, these costs are estimated to be low (no monetary estimates provided) in part because some regulatory framework in line with the QFT was already in place.
	Direct labour costs associated with designing quality traineeship schemes, drafting learning objectives, and supervising trainees	One-off (per traineeship scheme/ per trainee)	Not applicable	Not applicable to this stakeholder	Not generally available.	These costs are generally higher for small and medium sized enterprises than for large companies. Evidence from a Belgian SME suggests that for a six month traineeship, staff time required might be as follows: drafting vacancy notice (1-2 hours); drafting learning objectives (4 hours); explanation to supervisor of tasks required (4 hours); providing	Not available	

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						on the job training to trainee (6 hours); assessing skills acquired by trainee at the end of traineeship (2 hours).		
	Providing a written agreement	One-off (per traineeship scheme/per trainee)	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not generally available.</i>	Evidence from a Belgian SME suggests that around 0.75 hours of staff time might be required for this activity, in the case of a six month traineeship		
	Certifying trainees' skills	One-off (per traineeship scheme/ per trainee)	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not generally available.</i>	Evidence from a Belgian SME suggests that around 0.75 hours of staff time might be required for this activity, in the case of a six month traineeship		
	Costs of external services for advertising traineeship opportunities	Recurrent	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not available</i>	Advertising/marketing costs to raise awareness of open market traineeships. No monetary estimates provided.	<i>Not available</i>	Advertising/marketing costs to raise awareness of ALMP traineeships. No monetary estimates provided.

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Enforcement costs	Direct labour costs of investing in public services and labour inspectorates to monitor compliance.	Recurrent	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not available</i>	Not applicable to this stakeholder.	<i>Not available</i>	No monetary estimates provided. Enforcement of traineeship regulations is normally undertaken by the national labour inspectorate or equivalent, and any costs are incurred by the relevant national authorities. Such inspection, however, normally focuses on the enforcement of the relevant national legislation, and even where that legislation has been influenced to some extent by the QFT it is not possible to separately identify enforcement costs due to the QFT
Administrative costs	Managing cooperation with PES	Recurrent	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not available</i>		<i>Not available</i>	Administrative costs for PES to offer ALMP traineeships in line with QFT are likely to be business as usual costs which are incurred for all ALMP offers.

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	Managing subsidies/grants for traineeships	Recurrent				Administrative costs of applying for and managing these subsidies were also reported by businesses receiving them.		
Costs of financial incentives/subsidies	Costs of financial incentives/subsidies to encourage uptake of traineeships aimed at both trainees and employers, including traineeship grants	Recurrent	<i>Not applicable</i>	<i>Not applicable to this stakeholder</i>	<i>Not applicable</i>		<i>Not available</i>	
Direct benefits								
Improved market efficiency	Growth in number of quality traineeships	Recurrent	<i>Not available</i>	More opportunities for young people to undertake quality traineeships; No monetary estimates provided.	<i>Not available</i>	Improvement in skills and knowledge of employees and job applicants. No monetary estimates provided.	<i>Not available</i>	Increase in the share of the population with the skills needed for the labour market.
	Traineeships more aligned with labour market needs	Recurrent	<i>Not available</i>	No monetary estimates provided.	<i>Not available</i>	No monetary estimates provided.		No monetary estimates provided.
Improved welfare	Enhanced skills and certification of skills	Recurrent	<i>Not available</i>	More qualified future workforce. No monetary	<i>Not available</i>	More qualified future workforce. No monetary estimates provided.	<i>Not available</i>	Increase in the share of the population with the skills needed for the labour market. No monetary

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				estimates provided.				estimates provided.
	Improved access and transition to labour market	Recurrent	<i>Not available</i>	62% of respondents to the trainees' survey agreed that traineeships made transitioning from school to work easier. In Ireland, 98% of trainees moved into employment following the Career Traineeship programme of which 72% with employers that had originally hosted the trainees. No monetary estimates provided.	<i>Not available</i>	More qualified future workforce, fewer skills mismatches. No monetary estimates provided.	<i>Not available</i>	Increase in the share of the population with the skills needed for the labour market. No monetary estimates provided.

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	Reduced exploitation and greater awareness of rights	Recurrent	<i>Not available</i>	Trainees in particular cited this as a benefit. No monetary estimates provided.	<i>Not available</i>	Increased in employee productivity. No monetary estimates provided.	<i>Not available</i>	No monetary estimates provided.
Indirect benefits								
Wider macroeconomic benefits	Reduced welfare payments and increased tax revenue	Recurrent	<i>Not available</i>	Reduced welfare payments and increased tax revenue following on from supporting young people into employment. No monetary estimates provided.	<i>Not available</i>	Reduced welfare payments and increased tax revenue following on from supporting young people into employment. No monetary estimates provided.	<i>Not available</i>	Reduced welfare payments and increased tax revenue following on from supporting young people into employment. No monetary estimates provided.
Wider welfare benefits	Improved individuals' participation in society	Recurrent	<i>Not available</i>	Individuals more integrated into society (through work). Increased social cohesion. No monetary estimates provided.	<i>Not available</i>	No monetary estimates provided.	<i>Not available</i>	Individuals more integrated into society (through work). Increased social cohesion. No monetary estimates provided.

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	Improved individuals health and wellbeing	Recurrent	<i>Not available</i>	Improvement to individuals health and wellbeing. No monetary estimates provided.	<i>Not available</i>	No monetary estimates provided.	<i>Not available</i>	Reduced public health spending. No monetary estimates provided.
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