



# Study supporting the evaluation of the Quality Framework for Traineeships

Final report

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challenges  
today

## 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)<sup>1</sup>. 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 Plan<sup>2</sup>, 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.

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<sup>1</sup> [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))

<sup>2</sup> [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](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 EFQEA<sup>3</sup> 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.

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<sup>3</sup> 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.

